Child Protection and Safeguarding Policy

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Child Protection and Safeguarding 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 DDSL 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.

Key Contact Details:

Deputy Designated Safeguarding Leads	
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	Rebecca Markham-Jones rmarkham-Jones@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 address (it is best to email both addresses listed).	msloan@bedfordschool.org.uk / nwrycroft@bedfordschool.org.uk isilk@bedfordschool.org.uk / ehargreaves@bedfordschool.org.uk
Nominated Safeguarding Governor	Dr Andrew Edwards Tel: 01234 362241 or 01234 362244 (Contact via Bursary)

Chair 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: 01234 718700. Out of hours: **0300 300 8123.** Multiagency@bedford.gov.uk
Local Authority Designated Officer (LADO)	Sandeep Mohan Tel: 01234 276693 lado@bedford.gov.uk
Bedfordshire Police	Tel: 01234 841212 or dial 101 for non-emergency calls. For emergencies, dial 999, or 112 from a mobile
Prevent Duty	Prevent@beds.police.uk 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/schoolseducation-and-childcare/education-welfareservice/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
Bedford Borough Local Offer	https://localoffer.bedford.gov.uk
Bedfordshire Domestic Abuse Partnership	Home | Bedfordshire Domestic Abuse Partnership Advice and resources for professionals

September 2026 Amendments

Following the updates to KCSIE on 1 September 2026 the following amendments have been made to this policy:

Prejudice-Based Harm, p.11

The School recognises that prejudice-based behaviours and incidents may constitute safeguarding concerns and can cause significant harm to a child's welfare, wellbeing, development and sense of safety. This includes, but is not limited to, racism, faith-targeted abuse, antisemitism, Islamophobia, discriminatory language or behaviour based on disability, sex, sexual orientation, gender reassignment or other protected characteristics.

Staff should not dismiss such concerns as solely behaviour, bullying or equality matters. Any incident that may indicate prejudice-based harm should be considered within the context of safeguarding and reported to the DSL where there are concerns about a child's wellbeing, safety or welfare.

Arrangements for Dealing with Child on Child Abuse, p.23

- discriminatory behaviour, including racism, faith-targeted abuse, antisemitism, Islamophobia, homophobic, biphobic and transphobic abuse and other prejudice-based behaviours;

The School recognises that discriminatory behaviours, including racism and faith-targeted abuse, can constitute child-on-child abuse and may amount to a safeguarding concern where a child's welfare, wellbeing or sense of safety is adversely affected.

Teaching Children How to Keep Safe, p.41

The School promotes a culture of inclusion, respect and belonging in which all pupils are treated with dignity and respect. As part of its safeguarding responsibilities, the School actively works to prevent discrimination, harassment, prejudice-based abuse and victimisation. Through the curriculum, pastoral systems, staff training and behaviour expectations, the School seeks to foster an inclusive and anti-discriminatory culture where all pupils feel safe, listened to and valued.

Appendix 2: Sexual abuse, p.50

Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. Staff should be aware that children are more likely than not to know the person who is abusing them. Sexual abuse can be perpetrated by adults, other children, family members, peers, online contacts or individuals known to the child through community, educational, sporting or social settings.

A child under the age of 13 can never legally consent to any form of sexual activity.

Appendix 2: Racism and Faith-Targeted Abuse, p.56

Racism, antisemitism, Islamophobia and other forms of faith-targeted abuse can significantly affect a child's welfare, wellbeing and sense of safety. Such incidents should be taken seriously and responded to promptly. The School recognises that repeated or serious incidents may constitute a safeguarding concern and should be reported to the DSL so that appropriate support, intervention and monitoring can be put in place.

INTRODUCTION AND REGULATORY FRAMEWORK

This policy applies to Bedford School. This policy is reviewed and updated annually (as a minimum) and is available on the School website or on request.

This policy has regard to the following guidance and advice[5]:

- *Keeping Children Safe in Education* (September 2026) ("*KCSIE*") ○ *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)* ○ *KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children* (March 2026) ("*WT*") ○ *WT* refers to the non-statutory advice: *Information sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers* (May 2024)
- *Prevent duty guidance: Guidance for specified authorities in England and Wales December 2023. Prevent* is supplemented by a briefing note:
  - ○ *How social media is used to encourage travel to Syria and Iraq* (July 2015)
- *Relationships Education, Relationships, and Sex Education (RSE) and Health Education* (July 2025).
- *Behaviour in schools (February 2024)*
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)*
- *Children Missing Education (September 2025)*
- *Digital and technology standards in schools and colleges (June 2026)*
- *Mobile phones in schools (June 2026)*
- *After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)*
- *The National Minimum Standards for boarding schools (May 2026)*

This policy also takes into account the procedures and practice of Bedford Borough as part of the multi-agency safeguarding arrangements set up by the Bedford Borough Safeguarding Children Partnership and its safeguarding partners: Bedford Borough Council, Bedfordshire Police and the Bedfordshire, Luton and Milton Keynes Integrated Care Board (ICB).

Equality Act 2010[7]

The School understands and recognises their obligations under the Equality Act and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils. The School recognises that effective safeguarding is anti-discriminatory and anti-racist, and understands factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. Staff are alert to the risk of adultification bias, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

The School complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

Concerns about a child

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes.[8] Safeguarding and promoting the welfare of children is everyone's responsibility.[9] The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the school, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.[10]

Staff are required to report any concerns about the safety or welfare of a pupil, about the conduct of an adult working in the school or about safeguarding practices in the school in accordance with this policy.

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.**

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may raise concerns directly with the DfE if they wish.

The School has arrangements for listening to children and providing early help. Pupils are regularly reminded of the support from their tutors and Heads of Year / Housemaster, Chaplain, School Counsellor and School Nurses as well as details of the DSL Mrs Mellor (Upper School) and Mrs Stratton (Prep School) along with the DDSL's – Mr Everitt, Mr Marriott and Ms Swallow (Upper School) and Mr Lincoln (Prep School). All information for pupils is found on the 'What to do if you are worried' (Upper School) and 'Have you got a worry?' (Prep School) posters around school. This includes information on the independent listener for boarders.
Boarders have access to an Independent Listener who is independent of the School and whom they may contact confidentially for advice and support. Details are prominently displayed throughout boarding houses and included in boarding information provided to pupils.

Pupils are able to report concerns through the 'I have a worry' button on Pupil Link which allows for anonymous reporting of anything which may be worrying a pupil.

DEFINITIONS OF CHILD PROTECTION AND SAFEGUARDING [12]

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online;

- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.[13]

Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online, and in kinship care, foster care or residential care.

TYPES AND SIGNS OF ABUSE

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects.

Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession.

Abuse can be:

- physical abuse;
- emotional abuse; • sexual abuse; and/or
- neglect.

Staff are referred to Appendix 2 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.[14]

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD[15]

What staff should do if they have concerns about a child

If staff (including governors, supply staff, agency staff and volunteers) have any concern about a child, they should follow the procedures in this policy and report their concern to the DSL (or the DDSL in the DSL's absence) immediately using the contact details set out in 'Key School Contact Details' above. The DSL will consider, with reference to local authority procedures, whether the report can be managed internally, or a family help assessment is needed or it should be referred to external agencies such as children's social care and/or the police. A referral should normally be made by the DSL or DDSL but anyone can make a referral if necessary. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

Staff should not assume that somebody else will take action or share information that might be critical in keeping children safe. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School works with Bedford Borough Safeguarding Children Partnership. A full copy of their local procedures can be found at Safeguarding Bedfordshire - Bedford Borough Safeguarding Children Partnership.

Where staff have safeguarding concerns about a child who is not a pupil of the School (for example, a sibling of a pupil, or a child attending an activity on the School's premises), they should follow the same procedures and report their concern to the DSL immediately.

What staff should do if a child is in immediate danger or at risk of harm[29]

If staff (including governors, supply staff, agency staff and volunteers) believe that a child has been harmed or is in immediate danger or at risk of harm, an immediate referral to children's social care and/or the police should be made. Anyone can make a referral. Referrals will generally be made by the DSL following receipt of a report from staff. However, staff must feel confident to make a referral themselves if they believe a child is in immediate danger or at risk of harm.

Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required.

Prejudice-Based Harm

The School recognises that prejudice-based behaviours and incidents may constitute safeguarding concerns and can cause significant harm to a child's welfare, wellbeing, development and sense of safety. This includes, but is not limited to, racism, faith-targeted abuse, antisemitism, Islamophobia, discriminatory language or behaviour based on disability, sex, sexual orientation, gender reassignment or other protected characteristics.

Staff should not dismiss such concerns as solely behaviour, bullying or equality matters. Any incident that may indicate prejudice-based harm should be considered within the context of safeguarding and reported to the DSL where there are concerns about a child's wellbeing, safety or welfare.

Information Sharing

The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. [16]

Fears regarding sharing information under data protection laws (the Data Protection Act 2018, the UK General Data Protection Regulation and the Data (Use and Access) Act 2025) must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and data protection laws do not prevent the sharing of information for the purposes of keeping children safe.[17] When deciding what information to share, staff should consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. Care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL"). The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:[18]

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports staff who have to make decisions about sharing information.

The School has appropriate arrangements in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves, in line with the statutory guidance. When sharing safeguarding information the School will clearly distinguish current safeguarding concerns and support needs from historic information.

Where the School receives safeguarding information for pupils this will be reviewed by the DSL who will take steps to clarify any information that is unclear or incomplete. Where there are issues or concerns this may include a conversation between the DSLs at both settings. The DSL will ensure that key staff are aware of any relevant information for new pupils.

Where the School receives any information that indicates an incoming pupil may present a risk to others and/or themselves, the School will assess the risk and put in place a safety and support plan for when the child arrives.

Receiving a disclosure

If staff receive a disclosure from a child they should:[19]

- listen carefully

- avoid asking leading questions. When asking questions, always ask open questions using the TED principle of "Tell me, Explain to me, Describe to me".
- observe the child's behaviour
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication
- record the disclosure the same working day unless the child is at immediate risk of harm
- if the child is at immediate risk of harm a DSL / DDSL must be contacted in person / by phone for assistance

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).[22]

Wishes of the Child

Where there is a safeguarding concern, the School will ensure the pupil's wishes[23] and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence.[24] The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback[25].

The School implements a child-centred approach to safeguarding. Whilst the School are committed to working collaboratively, and in partnership, with parents and carers as far as possible the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

Contextual Safeguarding[26]

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early Help and Family Help[27]

Early help means the support available to all children and families through universal and community-based services, including schools, health services, and other local provision. Its purpose is to improve resilience and outcomes or to reduce the chance of problems getting worse. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement as association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of, or has been permanently excluded from schools, or is in Alternative Provision or a Pupil Referral Unit
- Is misusing drugs and alcohol themselves
- Is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Has been repeatedly removed from the classroom
- Is on a part-time timetable
- Is a privately fostered child
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage

Where a child's needs go beyond what universal early help services can address for example, where a child has multiple and/or complex needs, or where their circumstances make them more vulnerable the child may require targeted support through Family Help.

The School has effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate mandatory training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff who identify a pupil that may benefit from early help or Family Help should discuss this with the School's DSL. If appropriate, the DSL will work with the Bedford Borough Safeguarding Children Partnership and its safeguarding partners: Bedford Borough Council, Bedfordshire Police and the Bedfordshire, Luton and Milton Keynes Integrated Care Board (ICB) to undertake an assessment. Where the child's needs can be met through universal early help, the DSL will coordinate the School's response and liaise with relevant services. Where a child's needs are more complex and may require a multi-disciplinary Family Help assessment, the DSL will make a referral in accordance with the local authority's referral process. Further guidance can be found in

Working Together to Safeguard Children (March 2026) and the Families First Partnership Programme Guide.

If early help or Family Help is provided, the matter will be kept under review and consideration given to a referral to children's social care for a child protection assessment if the pupil's situation does not appear to be improving or if concerns escalate.

Referral to external agencies

Not all concerns about a pupil's welfare will meet the threshold for referral to external agencies. Where the DSL determines that a concern can be managed internally, and doing so does not place the child at additional risk, the School will put in place appropriate pastoral support. This may include, for example, monitoring by the pupil's form tutor or Head of Year (PS) / Housemaster (US), referral to the School's counsellor or School Nurses, or engagement with parents or carers. The DSL will keep such cases under review and will escalate to external agencies if the pupil's situation does not improve or if further concerns arise.

Record Keeping

All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded in writing. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled.

Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.

The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of KCSIE.[21]

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.

RESPONDING TO SPECIFIC SAFEGUARDING ISSUES

Radicalisation and Prevent[30]

All staff should be aware of the indicators which may signal that children are at risk of radicalisation or being drawn into terrorism and should report any concerns to the School's DSL. A Prevent referral or referral to children's social care may be made depending on the level of risk. If staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or email Prevent@beds.police.uk. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments[31] (following consultation with local partners, such as the police) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online. Such risk assessments are discussed with the Head, DSL and DDSLs and Nominated Safeguarding Governor to ensure the School's safeguarding arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified and appropriate support is provided and is regularly revised as needed.

Female Genital Mutilation ("FGM")[32]

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still report such cases to the DSL who will involve children's social care as appropriate. Staff are referred to Appendix 2 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

Serious violent crime

All staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), as above they should report this to the School's DSL as soon as possible.

Nude or semi-nude images and/or videos (including those generated using AI) [33]

The School is alert to the safeguarding risks arising from AI in this context, including the generation of deepfake intimate images using AI tools and the use of AI to create child sexual abuse material. Taking and sharing AI-generated intimate images of those aged under 18 is a criminal offence. Staff should be aware that incidents involving AI-generated imagery should be treated with the same seriousness as those involving real images and referred to the DSL immediately.

The School recognises that images of pupils published by the School on its website, social media channels, or in marketing materials may be vulnerable to misuse, including manipulation using AI tools. The School's approach to obtaining consent for, publishing, and managing pupil images (including the steps taken to mitigate the risk of AI manipulation of published images) is set out in the School's Privacy Notice and Taking, Storing and Using Images of Children Policy. Staff should refer to that policy for guidance on the publication of pupil images and should report any concerns about the misuse or manipulation of published images to the DSL immediately.

All members of staff in an education setting have a duty to recognise and refer any incidents involving nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes and will be equipped with the mandatory safeguarding training and support to enable them to recognise concerns.

For this purpose, 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or

created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as ‘deepfakes’ or ‘deep nudes’.

This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. The sharing of nude or semi-nude images and/or videos may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

The term ‘nudes’ is often used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’.

Many professionals may refer to ‘nudes and semi-nudes’ as:

- youth produced sexual imagery or ‘youth involved’ sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- ‘sexting’. Many adults may use this term, however some young people interpret sexting as ‘writing and sharing explicit messages with people they know’ rather than sharing images
- image-based sexual abuse. This term may be used when referring to the nonconsensual sharing of nudes and semi-nudes

Terms such as ‘revenge porn’ and ‘upskirting’ are also used to refer to specific incidents of nude or semi-nude images and/or videos being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of sharing of nude or semi-nude images and/or videos including those generated using AI being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible. All incidents involving the sharing of nude or seminude images will receive a safeguarding response, regardless of whether they are consensual or non-consensual. The School will take a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of the making or sharing of nude or semi-nude images and/or videos including those generated using AI. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).

- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

An immediate referral to police and/or children's social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nude or semi-nude images and/or videos including those generated using AI , for example, they are presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nude or semi-nude intimate images and/or videos including those generated using AI being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

Children absent from education

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.[34]

The School's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are set out in the Attendance Policy and Missing Pupil Policy to be used for searching for, and if necessary, reporting, any pupil missing from education.[35] Further detail can also be found at Appendix 2 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.[36]

The School will report to Bedford Borough a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.[37]

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the statutory DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)*.

Mental health support[39]

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Specifically, staff can support the fulfilment of four key roles:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and • liaison with/referral to specialist services where needed.

All staff should be aware that mental health problems can, in some cases develop into a safeguarding concern. This could include, for example, self-harm, eating disorders, or suicidal ideation. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support staff to promote positive health, wellbeing, and resilience among young people.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL. Where support is needed, the DSL will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

The DSL will call 999 if there is immediate danger and NHS 111 for urgent non-emergency mental health support.

Staff should not wait for a formal diagnosis before raising a concern with the DSL. If staff feel that a child is in immediate danger and the DSL or DDSL is not available, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.

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.[40]

Children with a social worker (Children in Need and Child Protection Plans)[38]

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

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Concerns about another staff member[41]

The School provides clear and comprehensive guidance about the standards of appropriate behaviour and actions of its staff in the Staff Code of Conduct as detailed in Appendix 3. All staff are expected to comply with the standards contained within this code of conduct at all times.

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, trainee teachers, volunteers, and contractors), then:

- this should be referred to the Head, who will consider whether an onward referral to the LADO is required
- where there is a concern/allegation about the Head, this should be referred to the Chair of Governors
- where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the LADO(s). The LADO's details are provided in this policy under Key External Contacts

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the procedure set out below under 'Dealing with concerns or allegations that do not meet the harm threshold/low level concerns.'

Concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'.[42]

Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found here Whistleblowing Policy 2026[43]

There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line.[44] Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ABUSE (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child on child abuse[45] (including child on child sexual violence and harassment) is abuse by one or more children against another child. It is a safeguarding concern for both the victim and the alleged perpetrator and is preventable. It can happen both inside and outside of school, and online. It can manifest itself in many ways and can include

- bullying (including cyber bullying, prejudice-based and discriminatory bullying),
- discriminatory behaviour, including racism, faith-targeted abuse, antisemitism, Islamophobia, homophobic, biphobic and transphobic abuse and other prejudice-based behaviours;
- abuse in intimate personal relationships between children (also known as teenage relationship abuse),
- physical abuse and harm (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm),
- physical assault and harm, or the threat of harm with a weapon,
- initiation/hazing type violence and rituals,
- upskirting[46],
- consensual and non-consensual making or sharing of nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes,
- harmful sexual behaviours, sexual violence and sexual harassment, which may include misogyny/misandry
- 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.[48]
- a group of children sexually assaulting or sexually harassing a single child or group of children.[49]

The School recognises that discriminatory behaviours, including racism and faithtargeted abuse, can constitute child-on-child abuse and may amount to a safeguarding concern where a child's welfare, wellbeing or sense of safety is adversely affected.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.[50]

The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys".[51] Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.[52]

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported.[53] The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.[54]

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.[55]

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident.[56] Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.[57]

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children as detailed in their Edukey learning plans and through oversight from Academic Support.[58] The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.[59]

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child on child abuse.[60] 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 will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

The School takes the following steps to minimise the risk of 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 childon-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.[61]

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Bedford Borough Safeguarding Children Partnership (BBSCP) and its safeguarding partners: Bedford Borough Council, Bedfordshire Police and the Bedfordshire, Luton and Milton Keynes Integrated Care Board on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Bedford Borough Safeguarding Children Partnership (BBSCP) and its safeguarding partners, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the Bedford Borough Safeguarding Children Partnership (BBSCP) and/ or the police as appropriate.[63] The School will have regard to the procedures set out in *KCSIE* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL (or DDSL) who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.[64]

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia.[65] Rape, assault by penetration and sexual assaults will be passed to the police. [66] Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers.[67] If the DSL decides to make a referral to children's social care and/or a report to the police referral contrary to the victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered.[68] The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the Bedford Borough Safeguarding Children Partnership (BBSCP) and its safeguarding partners referral process.

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).[69]

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024) when responding to an allegation that nude or semi-nude images and/or videos including those generated using AI have been shared.

In the event of disclosures about child on child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL / DDSL, their Head of Year / Housemaster [70] and support from pastoral colleagues / external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will 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;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised.[71] The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.[72] The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).[73] The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible.[74] This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport.[75] The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.[76]

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.[77]

The School will keep a written record of all concerns, discussions and decisions made.[78]

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic of inappropriate behaviour which may indicate an unacceptable culture, or any further development required in the School's safeguarding system which may require additional training or amendments to relevant policies.
Where a pattern is identified the School will decide on an appropriate course of action.[79]

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.[80] If a report is shown to be deliberately invented or malicious, the Head Master will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.[81]

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 5.

DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF (INCLUDING SUPPLY TEACHERS AND TRAINEE TEACHERS), VOLUNTEERS AND CONTRACTORS

The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors[82]) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Bedford Borough Safeguarding Children Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

• Behaved in a way that has harmed a child, or may have harmed a child; and/or • Possibly committed a criminal offence against or related to a child; and/or
• Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or • Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.[84]

In this section reference to 'allegations' also covers concerns.[85] Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.[86]

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' [87] who is the Head Master or Headmaster. Where the Head Master or Headmaster is absent or is the subject of the allegation, reports should be made to the Chair of Governors or school proprietor[88]. Where the Head Master or Headmaster is the subject of the allegation, the Head Master or Headmaster must not be informed of the allegation prior to contact with the Chair of Governors or school proprietor and LADO.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.[89]) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed.[90] The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.[91]

4. When to inform the individual who is the subject of the allegation will be considered on a case - by -case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.[92]

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff[93]:

    - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
    - providing an assistant to be present when the individual has contact with children;

- redeploying to alternative work in the School so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported.[94] It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details.[95] The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.[96]

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.[97]

7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.[98]

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police.[99] Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.[100]

9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).[101]

10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.[102]

11. The case manager will discuss with the LADO[103] whether a referral to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.[104] Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the TRA and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).[105]

12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.[106] Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made. [107]

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS and TRA where appropriate. [108]

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family.[109] The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.[110] Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.[111]

Allegations found to be malicious or false will be removed from the individual's personnel records [112] unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.[113] The information to be kept on

file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. [114] All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.[115]

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references.[116] If an allegation is shown to be deliberately invented or malicious, the DSL 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 Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.[117]

Procedure for managing allegations about supply teachers and contractors[118]

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead on handling allegations to ensure appropriate action is taken. The School will be responsible for gathering the facts and managing the safeguarding process, but agencies should be fully involved and will usually lead on any disciplinary action. The School will co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers.[119] This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the TRA).[120]

Safeguarding concerns and allegations about organisations or individuals using school premises[121]

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. The School will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)* and will seek assurance in this regard.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

DEALING WITH CONCERNS OR ALLEGATIONS THAT DO NOT MEET THE HARM THRESHOLD / LOW-LEVEL CONCERNS

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that[122]:

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

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a "nagging doubt". Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).[123]

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly
lived, monitored and reinforced by all staff.[124]

The School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's code of conduct can be found in Appendix 3.[125] The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to

not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns Policy. The Head Master is the ultimate decision-maker in respect of all low-level concerns.[126]

Staff must share all concerns with the Head Master without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a lowlevel concern is raised about the Head Master, it should be referred to the Chair of Governors.[127]

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.[128]

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.[129] The School will address unprofessional behaviour at an early stage and will support the individual to correct it.[130]

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with data protection laws at all times. The information will be retained securely by the School for as long as deemed relevant and necessary for a safeguarding purpose unless the School is required to disclose by law (for example, where the harm threshold is met in respect of the individual in question) or until the individual has left employment.[131]

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.[132]

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the Schools safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.[133]

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.[134]

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.[135]

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.[136]

All members of staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.[137] For most appointments, an enhanced DBS check with "barred list" information will be appropriate.[138] A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment.[139] Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.[140]

As part of the shortlisting process, the School will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment[141].

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment, Selection & Disclosure & Barring Service Policy & Procedure.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Recruitment , Selection & Disclosure & Barring Service Policy & Procedure.[142]

The Schools procedures for managing contractors attending the School site can be found in the School's Recruitment , Selection & Disclosure & Barring Service Policy & Procedure.

MANAGEMENT OF SAFEGUARDING

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.[143] [144] [145]

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School.[146] The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding

the filtering and monitoring systems and processes the School have in place[147]. The DSL works with the governors to review and update the School's safeguarding policy.[148]

Where a pupil leaves the School, including for in-year transfers, the DSL and/or a DDSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL and/or a DDSL will ensure secure transit and obtain confirmation of receipt.[149] In addition to the child protection file, the DSL and/or a DDSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.[150]

This includes sharing information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme, as well as information relating to serious violence or harmful sexual behaviours. It would be good practice for a conversation to take place between the DSLs at both settings, where there are issues or concern.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL and/or a DDSL will always be available during school hours for staff in the School to discuss any safeguarding concerns.[151] If a DSL or DDSL is not available in person, they can be contacted via email as detailed in the contacts section of this policy. The School has robust cover arrangements in place for when the DSL is unavailable, including a shared confidential mailbox and CPOMS to ensure safeguarding concerns are received, monitored and acted upon without delay.

The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with *WT*. "*NPCC When to call the police: guidance for schools and colleges*" (npcc.police.uk) can assist the DSL or DDSL understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL or DDSL will also be responsible for liaising with the Mental Health Lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.[153] The School's Mental Health Lead is Deputy Head, Pastoral (US) and the Deputy Assistant Head (Pastoral) (PS).

The DSL and DDSL should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.[154]

Whilst the Head Master should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.[155]

Full details of the DSL's role can be found at Annex B of *KCSIE*.

TRAINING

Induction and training are in line with advice from the Bedford Borough Safeguarding Children Partnership and the safeguarding partners for Bedford Borough: Bedford Borough Council, Bedfordshire Police and the Bedfordshire, Luton and Milton Keynes Integrated Care Board and are mandatory. [156]

All Staff

All new staff will be provided with mandatory induction training that includes[157]:

- the child protection and safeguarding policy (including the policy and procedures to deal with child on child abuse)[158];
- the role and identity of the DSL(s) and any DDSL
- the behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media;
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education;
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- a copy of Part one of *KCSIE* at least ; and
- School leaders and staff who work directly with children will also be required to read Part One of *KCSIE[159] (and Part five of KCSIE)*.

Copies of the above documents are provided to all staff during induction.[160]

Temporary staff, including supply staff, and volunteers are provided with safeguarding information on induction, including the Child Protection and Safeguarding Policy, Staff Code of Conduct, Whistleblowing Policy, Low-Level Concerns Policy, Part 1 of KCSIE, and the identity and contact details of the DSL and Deputy DSLs.[161]

All staff are also required to:

- Read Part one of *KCSIE[162]* in full and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via a Safeguarding briefing during inset or a new staff induction session for colleagues who start part-way through the academic year.[163]
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding through the completion of relevant iHASCo courses and assessments.
- Receive training in safeguarding and child protection regularly, in line with advice from the Bedford Borough Council, Bedfordshire Police and the Bedfordshire, Luton and Milton Keynes Integrated Care Board (ICB).[164]
- Training will include
    - online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) [165]
    - harmful sexual behaviours[166] (including child on child sexual violence and harassment).

- the safe and effective use of AI including training on identifying and mitigating the key risks associated with AI, including risks to safeguarding, data protection, ethics, and intellectual property. The School will draw on the DfE's support materials on *Generative artificial intelligence in education*, developed in partnership with the Chiltern Learning Trust and the Chartered College of Teaching, including Module 3 on safe use.
- Prevent awareness training[167] to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements.

- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online.[168] The School provides these via, for example, termly safeguarding training during inset.

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.[171]

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, data protection laws, and their local multi-agency safeguarding arrangements.[172] Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. Data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

In addition, the governing body complies with the DfE's Data Protection guidance for schools, ensuring school staff, governors and trustees know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

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.

DSL(s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role.[173] This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children[174], training in the Bedford Borough Council, Bedfordshire Police and the Bedfordshire, Luton and Milton Keynes Integrated Care Board (ICB) approach to *Prevent* duties[175] and harmful sexual behaviours.

The DSL receives additional training on AI-related safeguarding risks, including the creation and sharing of AI-generated intimate imagery (deepfakes), the potential for AI tools to be used to groom or exploit children, and the application of the School's filtering and monitoring arrangements to generative AI tools. Training will be reviewed and updated at least annually to reflect the rapidly evolving nature of AI technology.

The DSL also receives more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This training is updated at least every two years, enabling the DSL to support other staff on Prevent matters and update them on relevant issues. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually[176] to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.[177]

The DDSLs are trained to the same level as the DSL.[178]

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

The governing body has designated governors with specific responsibilities for safeguarding and related areas, in order to provide strategic oversight, support and challenge to the School's leadership. These designated roles include:

Safeguarding Governor: Dr Andrew Edwards is the Nominated Safeguarding Governor. The Safeguarding Governor takes a lead role at board level in championing safeguarding and child protection across the School. Their responsibilities include liaising regularly with the DSL to maintain oversight of safeguarding activity; reviewing and challenging the effectiveness of safeguarding policies and procedures; ensuring that the annual review of this policy is carried out and that safeguarding remains a standing agenda item at governing body meetings; monitoring safeguarding training compliance for staff and governors; and reporting to the full governing body on safeguarding matters at least termly. The Safeguarding Governor receives enhanced safeguarding training to enable them to provide informed strategic challenge and is familiar with the local multi-agency safeguarding arrangements.

SEND Governor: Mr Mark Slater is the designated SEND Governor. The SEND Governor provides strategic oversight of the School's provision for pupils with special educational needs and disabilities, with particular regard to the additional safeguarding challenges that children with SEND can face. The SEND Governor liaises regularly with the SENCO to ensure that safeguarding considerations are

fully integrated into the School's SEND provision and that staff are equipped to recognise and respond to safeguarding concerns involving children with SEND.

Online Safety Governor: Dr Andrew Edwards is the designated Online Safety Governor. The Online Safety Governor provides board-level oversight of the School's approach to online safety, including filtering and monitoring systems, cyber security arrangements, the safe use of generative AI, and the School's response to online safeguarding incidents. The Online Safety Governor liaises regularly with the DSL and relevant IT staff to ensure that the School's online safety arrangements are robust, proportionate and regularly updated to reflect the rapidly evolving nature of technology and online risks, including risks arising from generative AI.

All governors with designated safeguarding-related roles receive appropriate induction and ongoing training relevant to their area of responsibility. They work collaboratively to ensure that the governing body maintains effective strategic oversight of safeguarding across the School, and they report to the full governing body on their respective areas at least termly.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt.[180] The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.[181]

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.[182]

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.[183]

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE[184] to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation and extremism.[185] This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.[186] The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed.[187]

The School promotes a culture of inclusion, respect and belonging in which all pupils are treated with dignity and respect. As part of its safeguarding responsibilities, the School actively works to prevent discrimination, harassment, prejudice-based abuse and victimisation. Through the curriculum, pastoral systems, staff training and behaviour expectations, the School seeks to foster an inclusive and anti-discriminatory culture where all pupils feel safe, listened to and valued.

Internet safety (including when children are online at home) is embedded in PSHE and Relationships Education and/or Relationships and Sex Education ("RSE").

Filtering and monitoring

The School has appropriate filters and monitoring systems in place[188] to safeguard children from potentially harmful and inappropriate material online when using the School's IT system.[189] The School's filtering and monitoring system is Smoothwall.[190]

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories (content risk); reduce the risk of children being subjected to harmful online interaction with other users or generative AI applications that simulate this, including 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 (contact risk); restrict access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images e.g. consensual and non-consensual making or sharing nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes and/or pornography, sharing other explicit images and online bullying (conduct risk). [191]

The School ensures compliance with the DfE's 'Cyber security/filtering and monitoring standards for schools' by[192];

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the effectiveness of the filtering and monitoring provision at least annually. Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's DSL and IT support. They will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

The School ensures that its filtering and monitoring arrangements address risks, including in relation to any generative AI tools used within the School.

Further detail of the Schools policy and procedures in relation to online safety[195] can be found in the School's Online Safety Policy and Mobile Phone Policy which include detail on the use of mobile and smart technology in School, including the School's management of the associated risks,[196] and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet[197] through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of

what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

Use of artificial intelligence (AI)

The School recognises that artificial intelligence, including generative AI, presents both significant opportunities and safeguarding risks in education. The School is committed to ensuring that the use of AI is safe, ethical, transparent and aligned with the School's safeguarding obligations. The School's approach to AI safeguarding is embedded within the existing provisions of this policy, including in relation to filtering and monitoring, online safety, training and responding to specific safeguarding issues

The School will only use AI products that meet the DfE's *Generative AI: product safety expectations* and any use of generative AI by staff or pupils will be carefully considered and assessed, evaluating the benefits and risks within the School's context.

The School is alert to the safeguarding risks arising from AI, including but not limited to:

- the generation of deepfake images and AI-generated intimate imagery;
- the potential for AI chatbots to produce harmful, inaccurate, or age-inappropriate content;
- the risk of 'cognitive offloading' where pupils defer their critical thinking to AI tools; and
- the use of AI to facilitate grooming, exploitation, or the creation of child sexual abuse material.

Any safeguarding or wellbeing concern arising from the use of AI tools should be reported to the DSL immediately, using the procedures set out in this policy.

This includes, but is not limited to, concerns about:

- a pupil creating, sharing, or being the subject of AI-generated intimate imagery (deepfakes)
- a pupil being exposed to harmful, inaccurate, or age-inappropriate content through an AI tool
- a pupil's personal data being compromised through the use of an AI tool
- a pupil interacting with an AI chatbot in a way that causes concern for their welfare or mental health
- a member of staff using AI in a way that may compromise pupil safety or data security.

The DSL will investigate any AI-related safeguarding concern and determine whether it should be referred to external agencies such as children's social care and/or the police, in accordance with the procedures set out in this policy.

The School's AI Policy sets out further detail on the School's approach to AI, including approved tools, acceptable use guidelines, academic integrity expectations and data protection arrangements. Staff should refer to that policy alongside the safeguarding procedures set out in this policy.

Use of mobile phones

The School operates as a mobile phone-free environment by default, in accordance with the DfE's statutory guidance on Mobile phones in schools. Pupils do not have access to their mobile phones

throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime unless a clearly defined exception has been agreed by the Head Master.

The School's mobile phone policy can be found on SharePoint.

The School recognises that notwithstanding the mobile phone ban, children may still have access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), through other personal devices such as, where permitted, personal laptops or tablets. The School's filtering and monitoring systems may not apply to content accessed via pupils' personal devices. This is particularly the case where those devices are not connected to the School's network.To mitigate this risk, the School require any personal device used in School to connect to the internet only through the School's filtered network; and ensuring that any 'bring your own device' (BYOD) arrangements are subject to the School's acceptable use policy. Any safeguarding concerns arising from a pupil's use of a personal device should be reported to the DSL immediately.

Cyber security

The School recognises that cyber security is a safeguarding concern. If a child's sensitive data is compromised by a cyber-attack, it puts their safety and wellbeing at risk. The School takes measures to safeguard children by protecting personal information and ensuring appropriate cyber security systems are in place, in line with the DfE's *Cyber security standards for schools and colleges* and the *Digital and technology standards in schools and colleges (April 2026)*.

The School's arrangements include maintaining an information asset register, keeping hardware and systems registers up to date, and having a disaster recovery and business continuity plan that addresses digital technology. The School is working towards meeting the six core digital and technology standards by 2030.

Relationships and Sex Education ("RSE")[198]

The School understands that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

The School's RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. [199] The School focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. The School's curriculum also addresses online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help. The School recognises that discussions about sensitive topics in RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

The School has regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching RSE.

The School's RE/RSE Policy sets out the curriculum content, how and when it will be taught, and who is responsible for teaching it, including any external providers the School will use. The School

proactively engages and consults parents in the development and review of this policy. Parents will be informed of their right to request that their child is withdrawn from sex education.

Sport

The School recognises that sport and physical activities can present unique safeguarding risks. Staff involved in the delivery of sport and physical education should be alert to safeguarding concerns that may arise in these settings, including risks associated with physical contact, changing facilities, one-to-one coaching, and away fixtures or tours. The School will have regard to the relevant provisions in KCSIE and any guidance issued by relevant national governing bodies of sport or professional associations. Where the School engages external sports coaches or providers, it will satisfy itself that appropriate safeguarding checks have been carried out and that providers have adequate safeguarding policies in place.

Looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The Deputy Head, Pastoral (US) and Assistant Head, Pastoral are the designated member of staff[200] who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

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 the arrangements. The Local Authority must be notified by either the proposed private foster carer or the parent or person making the arrangement or any parent with parental responsibility who becomes aware of the arrangement.

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.

LGBTQ+ Pupils

The school takes its duty to ensure every child is included and celebrated seriously. While a child identifying as LGBTQ+ (lesbian, gay, bisexual, transgender, queer/questioning and other sexual orientations and gender identities) 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 LGBTQ+ 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.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable.[201] The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and the British values of democracy.[202]

The School will undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.[203]

Visiting Speakers, whilst on the School site, will be supervised by a School employee.[204] On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Arrangements for use of school premises for non-school activities[205]

When services or activities are provided under the direct supervision or management of School staff, this Policy will apply to any safeguarding concerns or allegations arising from those activities.

When activities take place outside term time as part of the School's educational provision, including training camps, trips and holiday programmes, the School's normal safeguarding arrangements will apply. A suitably trained member of staff will be designated to lead safeguarding arrangements for the activity and act as a Deputy Designated Safeguarding Lead where appropriate.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place and will review these as necessary. This applies regardless of whether the children attending are pupils of the School.

The School will ensure that safeguarding requirements are incorporated into all hire, lease or use agreements relating to School premises. Failure to comply with these requirements may result in termination of the agreement.

The School has established procedures for managing safeguarding concerns arising during holiday periods and from third-party providers using School premises. These procedures are documented internally and reviewed annually. Where concerns arise regarding a provider's safeguarding practice, the School will apply its own safeguarding procedures and, where necessary, take appropriate action if it believes a concern has not been managed adequately.

To support effective oversight, designated members of the Events Team and senior staff responsible for the School estate receive safeguarding training that enables them to review provider arrangements, assess safeguarding documentation and respond appropriately to safeguarding concerns.

The School will ensure that a DSL or DDSL can be contacted whenever School premises are being used for activities involving children. When considering provider arrangements, the School will have regard to the DfE's non-statutory guidance *After-school clubs, community activities and tuition: safeguarding guidance for providers* (February 2026).[206]

Operation Encompass[207]

The School is part of Operation Encompass, which is an information sharing scheme placed on a statutory footing by Section 49A of the Domestic Abuse Act 2021 (as inserted by Section 20 of the Victims and Prisoners Act 2024). Operation Encompass supports children who experience domestic abuse.

Under this statutory duty, the police are required to notify the School if they have reasonable grounds to believe that a child may be a victim of domestic abuse. This duty applies in respect of all children connected to a household where police attended a domestic abuse incident, including children who were not physically present at the time of the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL (known as the Key Adult) and include the child's details, their relationship to the perpetrator and the voice of the child, such as what they are saying and how they are behaving.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

The School's DSL, Rachel Mellor (US) and Rachel Stratton DDSL (PS) and the DDSLs have completed the National Online Operation Encompass Key Adult training. All staff are encouraged undertake the online training. The DSL will provide training for all staff and Governors about Operation Encompass, the prevalence of domestic abuse and the impact of this abuse on children.

Temporary accommodation notification

Where the School receives a notification from the local housing authority, under the Children's Wellbeing and Schools Act 2026, that a child has been placed in temporary accommodation, the Designated Safeguarding Lead (or a deputy) will:

- assess whether the child's welfare needs have changed and whether additional pastoral, academic or safeguarding support is required;
- liaise with relevant agencies, including the local housing authority and, where appropriate, local authority children's social care, to ensure coordinated support is provided; and
- make a referral to local authority children's social care where there are concerns that the child has been harmed or is at risk of harm.

This notification does not replace existing safeguarding and welfare duties. Staff who become aware of concerns about a child's welfare arising from homelessness or temporary accommodation should report these to the DSL in the usual way.

Disqualification from working in childcare[209]

Where staff work in or are involved in the management of provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006.[210] These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment, Selection & Disclosure & Barring Service Policy & Procedure.[211]

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register.[212] This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified.[213] Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

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 reconsideration. Details on how to escalate a concern following a report to the Local Authority can be found here Safeguarding Bedfordshire - Escalating Concerns

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.

Appendix 2 - SIGNS AND TYPES OF ABUSE AND SPECIFIC SAFEGUARDING ISSUES

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and often overlap and can put children at risk. Staff should understand that children can experience more than one type of harm simultaneously. Therefore staff should always be vigilant and always raise any concerns with the DSL or DDSL.[222]

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as "extra-familial harm." Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults and harm may be perpetrated or facilitated by individuals or groups. Forms of extra-familial harm include child criminal exploitation (such as county lines and financial exploitation), serious violence, modern slavery and human trafficking, online harm, sexual exploitation (including group-based child sexual exploitation), child-on-child sexual abuse and other forms of harmful behaviour displayed by children towards their peers, domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking) , and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.[223]

While any child can experience harm outside the home, children with special educational needs or disabilities, those missing from home, care or education, looked after children, and those with previous experience of abuse or neglect, may be at greater risk of harms such as sexual or criminal exploitation. Perpetrators, including those acting in organised groups, may purposefully target children who are already vulnerable.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.[224]

In all cases, if staff are unsure, they should always speak to the DSL or DDSL.[225]

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.[226]

Emotional abuse: the persistent emotional or psychological 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, silencing them or 'making fun' of them. It may include verbal abuse (e.g. criticism, belittling, name-calling). 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.[227]

Sexual abuse: Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. Staff should be aware that children are more likely than not to know the person who is abusing them. Sexual abuse can be perpetrated by adults, other children, family members, peers, online contacts or individuals known to the child through community, educational, sporting or social settings.
A child under the age of 13 can never legally consent to any form of sexual activity.

The activities may involve physical contact, rape (including penetration of vagina, anus or mouth and penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place in family settings, in institutional settings, online, and technology can be used to facilitate offline abuse. Child sexual abuse material available online may have been generated in a family environment. Online abuse can also take the form of cyber-grooming or self-generated sexual content under coercion. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. A child of any age or gender can be a victim of sexual abuse.[228] Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. [229] Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

The Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. There are also the below resources available:

Tackling Child Sexual Abuse Strategy – Home Office policy paper
Together we can stop child sexual abuse – HM Government campaign

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or nonconsensual sharing of nude or semi-nude images and/or videos including those generated using AI e.g. deepfakes (often referred to as the sharing of

nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.[230]

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.[231]

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.[232]

Harmful sexual behaviour (HSB): Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent . Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term "harmful sexual behaviour" is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context. HSB can, in some cases, progress on a continuum. This is consistent with the Hackett Continuum, which distinguishes between developmentally normal, inappropriate, problematic, abusive and violent sexual behaviours.

The School will respond to all signs, reports and concerns of HSB, sexual harassment and sexual violence, including where behaviour falls at the lower end of the continuum. Early intervention in inappropriate such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.. Sexual behaviour between children may be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.[233]

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

The Lucy Faithfull Foundation has developed a harmful sexual behaviour toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about harmful sexual behaviour by children, internet safety, sexual development and preventing child sexual abuse.

The NSPCC provides free and independent advice about harmful sexual behaviour: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals | The Contextual Safeguarding programme based at the University of Durham provides a school self-assessment toolkit and guidance for addressing harmful sexual behaviour in schools.

StopItNow – Preventing harmful sexual behaviour in children: provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Sharing of nude or semi-nude images and/or videos including those generated using AI: the sending or posting of nude or semi-nude images and/or videos, or live streams including those generated using AI (also known as 'nudes' or 'semi-nudes') , online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nude or semi-nude images and/or videos including those generated using AI can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nude or semi-nude images and/or videos.
The motivations for taking and sharing nude or semi-nude images and/or videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nude or semi-nude images and/or videos online and share them claiming to be from a peer

- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new intimate image and/or video of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include: ○ children and young people selling nude or semi-nude images and/or videos of others online ○ children and young people coercing a peer into sharing self-generated intimate images and/or videos to blackmail them for money, further images, or force them into illegal activity

- children and young people hacking a peer's account to share images more widely without consent to publicly shame

- children and young people create and share nude or semi-nude images and/or videos with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) sets out the classification of incidents, and how each should be handled. [234]

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.[235]

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.[236]

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of committing violence, increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

All staff should also be aware of the associated risks which increase the likelihood of involvement in serious violence which include

- being male,
- frequent absence from school,
- having been suspended or permanently excluded from school,
- having experienced child maltreatment,
- having previously been involved in committing violence or other offences (such as theft or robbery)
- having used drugs or alcohol in early adolescence
- having previously been a victim of violence

Staff should be aware that children who are involved in committing violence may themselves be victims in need of support. Unexplained gifts or new possessions could also indicate that children

have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff must report any concern about a child carrying or using a weapon, or expressing intent to do so, to the DSL immediately. The DSL should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict. Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support. Practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence.

Specific safeguarding issues: safeguarding issues often overlap and can put children at risk of harm**.** Behaviours linked to drug taking, alcohol misuse, unexplainable and/or persistent absences from education, serious violence, criminal exploitation (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude or semi-nude images including those generated using AI e.g. deepfakes and/or videos. put children in danger.[238] Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual.[239] Safeguarding issues can also be linked to, for example, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; radicalisation; relationship abuse; and trafficking.[240]

Racism and Faith-Targeted Abuse: Racism, antisemitism, Islamophobia and other forms of faith-targeted abuse can significantly affect a child's welfare, wellbeing and sense of safety. Such incidents should be taken seriously and responded to promptly. The School recognises that repeated or serious incidents may constitute a safeguarding concern and should be reported to the DSL so that appropriate support, intervention and monitoring can be put in place.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual.
CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. [241]As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

Group-based child sexual exploitation: Group-based is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes, for example, introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child, or allowing their property to be used for sexual activities with a child. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".[242] The Children's Society and Home Office has also published guidance on Preventing Child Sexual Exploitation.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.[243] It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.[244]

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse. CCE and CSE can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. A relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Children who have been exploited will need additional support to help maintain them in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals.[245]

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 National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2025)*".[246]

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not

currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre – NCSC.gov.uk.[247]

Mental health: all staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. [248]

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

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

Where children have suffered abuse, exploitation and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.
If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL {or DDSL}.

More information can be found in the *Mental* health *and* behaviour *in* schools guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. The NHS Every Mind Matters website also contains helpful information and advice about Looking after a child or young person's mental health.

Honour or faith based abuse: 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.[249]

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.[250] Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.[251]

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL {or DDSL}who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers to personally report to the police[252] where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. [253] If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.[254]

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.[255] 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 communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)*Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Radicalisation: is the process of a person legitimising support for, or use of, terrorist violence.[256]

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those different faiths and beliefs.[257]

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.[258]

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with 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. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL {or the DDSL,} who should be aware of the local procedures in place, before making a Prevent referral.[259]

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudicebased bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.[260]

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Safeguarding children with medical conditions: The fact that there has been an incident relating to the management of a child's medical condition or allergy would not in itself warrant a referral to local safeguarding partners. The DSL will consider a safeguarding referral where an incident highlights concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the School, or where they are repeatedly sent without essential medication, thereby putting the child at risk. The School will work collaboratively with healthcare professionals to ensure that any safeguarding concerns arising from a child's medical condition are identified and addressed promptly.

Further information can be found in the DfE statutory guidance on supporting Pupils at School with Medical Conditions. and Allergy safety in schools.

Young carers: A young carer is a person under 18 who provides or intends to provide care for another person. Young carers may face additional safeguarding challenges and may be more vulnerable due to the responsibilities they carry. Staff should be alert to signs that a child is taking on caring responsibilities that are inappropriate for their age and which may be impacting on their attendance, attainment, or wellbeing. Concerns about young carers should be discussed with the DSL.

Children who are lesbian, gay or bisexual: A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. The School should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

Children who are questioning their gender: When supporting a gender questioning child, the School will not initiate any action. The School will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences.

Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. In making decisions about supporting social transitions, staff will comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law. The DSL will be involved in all cases where a child is questioning their gender. Staff will not adopt any changes relating to social transition unless a decision has been made by a school or college and a child's parents or carers have been involved. Parents will be involved in the vast majority of cases. In the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the DSL will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

The School complies with its obligations under the Education (Independent School Standards) Regulations 2014 regarding the provision of toilets and washing facilities. The School does not permit children to use toilets designated for the opposite biological sex. The School has regard to the provisions set out in Part two of KCSIE regarding single-sex spaces, changing rooms, and (where applicable) boarding and residential accommodation.

Further guidance on single-sex spaces, sport, and boarding accommodation is set out in Part two of *KCSIE* (September 2026).

Domestic abuse: Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place. This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services. The Domestic Abuse Act 2021 introduced a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological, emotional, or other abuse such as 'honour' abuse, faith- or belief-based abuse, forced marriage, female genital mutilation or reproductive coercion, harassment and stalking. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.[262]

Operation Encompass: Section 20 of the Victims and Prisoners Act 2024 introduced a new provision into Part 3 of the Domestic Abuse Act 2021 under Section 49A, placing a statutory duty on police forces across England and Wales to notify a child's educational setting if they have reasonable grounds to believe a child may be a victim of domestic abuse. This duty applies to all children connected to the household where police attended a domestic abuse incident, including children not physically present. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.[263]

Children who are absent from school: The School's full procedures for dealing with children who are absent from education, including persistently or for prolonged periods staff are referred to the section 'Children absent from education' in the main body of this policy. A child being absent from school is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, honour or faith based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods.[264]

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of The School Attendance (Pupil Registration) (England) Regulations 2024.[265] This will assist the local authority[266] to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority and the local authority where the child is normally resident[267] 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, at such intervals as are agreed between the School and the local authority.[268] [269]

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

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. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.[270]

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 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate. [271]

Children with family members in prison: Approximately 193,000 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 Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.[272]

The Prisoners' Families Helpline provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Further support for families can be found at the Prisoners' Families Helpline website.[273]

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 recentlyleft 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.1

7 Dress and Appearance

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

[11] See *KCSIE* guidance

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

If, as part of restrictive intervention, 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.

Restrictive interventions and reasonable force

There may be exceptional circumstances in which a member of staff needs to use reasonable force, for example to prevent a pupil from hurting themselves or others. The use of force should be reasonable, proportionate and necessary in the circumstances, and staff should seek to prevent and de-escalate situations wherever possible. Staff should be familiar with the Department for Education guidance, *Restrictive interventions, including use of reasonable force, in schools* (2026). The need to use force at Bedford is extremely rare. Any significant incident involving the use of force must be recorded and reported in accordance with the statutory requirements and the school's procedures, with the DSL informed 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 sexual abuse material (CSAM) 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.

Michael Sloan
Head Master
September 2026

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; Working Together to Improve School Attendance, 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), Upper School and the Assistant Head, (Pastoral), Prep School are responsible for all matters of attendance, their contacts are in the safeguarding policy and available from the Bellroom or Prep School reception.

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 KCSIE 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 peeron-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 B 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. 2

  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 support for children who have

[2] https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

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 Bedford Borough Safeguarding Children Partnership 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.