



Safeguarding (Child Protection) Policy

Person responsible	DSL & Safeguarding Governor
Last update	September 2026
Frequency of Review	Annual
Date of last review by Governors	September 2026
Date of next review by Governors	September 2027

This Policy was reviewed and approved by the Chair of Governors and the Safeguarding Governors in September 2026. This version is in force from September 2026 and supersedes all previous versions.

Formal ratification by the full Governing Body will occur at the termly meeting in November 2026.

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1. Introduction and Aims (including Key Contacts)

This Policy for Bute House Preparatory School (the School) applies to the whole School, including EYFS, and is available to staff on Teacherlink, to the public on the School's website and is available in hard copy if required.

Policy Statement

The School is committed to safeguarding and aims to create a whole school culture of vigilance. The commitment to a culture of safety is embedded in the School: the Governing Body, Head, SLT and all members of staff recognise their responsibility for the implementation of all safeguarding arrangements. Safeguarding is everyone's responsibility. The School wants every pupil to feel safe and protected from neglect and abuse, to recognise when they are at risk and to know there is someone they can turn to if they are being neglected or abused. All staff (whether employed, contracted, peripatetic, volunteer or student) have a duty to protect the pupils from harm and this duty applies to everyone working in the School. Adults in the School take all welfare concerns seriously and encourage pupils to talk to them about anything that worries them.

The School will safeguard and promote the welfare of pupils at the School, having regard to the following guidance:

- Working Together to Safeguard Children (March 2026) (WTSC)
- Keeping Children Safe in Education (September 2026) (KCSIE)
- The Prevent Duty Guidance: for England and Wales (2023)
- Notice, Check, Share guidance (2026)
- The Education (Independent School Standards) Regulations (as most recently amended)
- Working Together to Improve School Attendance (July 2026)
- The Statutory Framework for the Early Years Foundation Stage for group and school-based providers (effective September 2026)
- Disqualification under the Childcare Act 2006 (2018)
- Channel Duty Guidance: Protecting people susceptible to radicalisation (2023)
- PACE Code C (2023)
- Multi-agency Statutory Guidance on FGM (2020)

- Education and Skills Act (2008)
- Children Act (1989)
- Children and Social Work Act (2017)
- Children's Wellbeing and Schools Act (2026)
- Data Protection Act and GDPR (2018) and the Data (Use and Access) Act (2025)
- Equality Act: advice for schools (2010)
- Educate Against Hate (2018)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance (2025, effective September 2026)
- Charities Act (2011, as amended by the Charities Act 2022) and Charity Commission Guidance: Safeguarding and protecting people for charities and trustees (2022) and How to report a serious incident in your charity (2026)
- Searching, screening and confiscation: advice for schools (2022)
- Teaching online safety in schools (2023)
- Harmful online challenges and online hoaxes (2021)
- Safeguarding children and protecting professionals in early years settings; online safety considerations (UK Council for Internet Safety, 2019)
- Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from sexual exploitation (2017)
- Domestic Abuse Act 2021 and the Domestic Abuse Statutory Guidance (2022)
- Restrictive interventions, including use of reasonable force, in schools (DfE 2026)
- Behaviour in schools: advice for headteachers and school staff (DfE 2024)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS 2024)
- Meeting digital and technology standards in schools and colleges, including the filtering and monitoring standards and the cyber security core standard
- SEND Code of Practice: 0 to 25 years (2015)

Key Contacts

The School's Safeguarding Team

The following individuals have responsibility for Child Protection and Safeguarding matters:

Name	Role	Responsibility	Telephone	Email
Mrs Ellen Yap	Deputy Head Pastoral	Designated Safeguarding Lead (DSL) and Prevent Lead (including EYFS)	020 7603 7381	safeguarding@butehouse.co.uk
Ms Nieves Garcia	Cover Coordinator	Deputy Designated Safeguarding Lead (DDSL)	020 7603 7381	safeguarding@butehouse.co.uk
Miss Samantha Morey	Year 3 Teacher	Deputy Designated Safeguarding Lead (DDSL) Online Safety Coordinator	020 7603 7381	safeguarding@butehouse.co.uk
Mrs Jo Farquharson	Governor	Safeguarding, Prevent Governor, and Governor responsible for filtering and monitoring		Contact via the Clerk to the Governors: Julia.Watkiss@butehouse.co.uk
Mrs Amanda Barron	Governor	Deputy Safeguarding Governor		Contact via the Clerk to the Governors: Julia.Watkiss@butehouse.co.uk
Mr Jonathan Beckitt	Governor	Chair of Governors		Contact via the Clerk to the Governors: Julia.Watkiss@butehouse.co.uk

Child Protection and Safeguarding Contact Details

LOCAL AUTHORITY SERVICES – HAMMERSMITH & FULHAM LOCAL
SAFEGUARDING CHILDREN'S PARTNERSHIP

All serious child protection concerns must be reported to Hammersmith & Fulham Children's Social Care via the ICAT (Initial Consultation and Advice Team) at familyservices@lbhf.gov.uk or the numbers indicated below. Referrals concerning a child who is a resident in another local authority will be made to that authority's social care service. Referrals are handled in accordance with inter-agency procedures of the Hammersmith and Fulham Local Safeguarding Children Partnership (LSCP).

Allegations against staff must be reported to the LADO (Local Authority Designated Officer) in Hammersmith and Fulham. Contact with the LADO is made via the phone number or email below. The LADO may also be consulted where it is unclear whether the threshold is met.

Hammersmith and Fulham

Role	Name	Phone	Referral details
Children's Social Care Services Department – Initial Consultation and Advice Team (ICAT)	Duty Social Worker	020 8753 6600 020 8753 6610 Out of hours (phone only) - 020 8748 8588 (17:15-09:00)	Online referral form via lbhf.gov.uk familyservices@lbhf.gov.uk
H&F Local Authority Designated Officer (LADO)	Kembra Healy Safer Organisations (LADO) & Safeguarding in Education Manager	020 8753 5125 (09:00–17:15)	lado@lbhf.gov.uk

Royal Borough of Kensington and Chelsea

Role	Name	Phone	Referral details
Children's Social Care – Front Door	Duty Child Protection Advisor	020 7361 3013 020 7373 2227 (out of hours Emergency Duty Team)	RBKC Social Care Portal (online referral form) socialservices@rbkc.gov.uk

London Borough of Westminster

Role	Name	Phone	Referral details
Children's Services – Front Door	Duty Child Protection Advisor	020 7641 4000 (includes out of hours Emergency Duty Team)	Westminster MARF via Social Care Portal accesstochildrensservices@westminster.gov.uk

Other useful contacts

Prevent Schools Officer for K&C and H&F 020 8753 6918 Simone.Torry@lbhf.gov.uk
Police non-emergency 101 (non-emergency) 999 (emergency)
Police Anti-Terrorist Hotline 0800 789 321
Police Child Abuse Investigation Team 020 8247 6331
Forced Marriage Unit 020 7008 0151 fmufco.gov.uk
DfE Helpline (Extremism) 020 7340 7264
counter.extremism@education.gov.uk
Disclosure and Barring Service 01325 953 795
www.gov.uk/government/organisations/disclosure-and-barring-service
Ofsted – Concerns Helpline 0300 123 1231
NSPCC Whistle-Blowing Helpline 0800 028 0285 help@nspcc.org.uk
Reporting Serious Wrongdoing to the Charity Commission:
whistleblowing@charitycomission.gov.uk

2. Scope and Responsibilities

2.1 The School and all members of its staff have a responsibility to:

- Be alert to signs of abuse and neglect by knowing and recognising them
- Question behaviours if something seems unusual and ask for help
- Take action to protect a pupil who is suffering maltreatment, significant harm, or is likely to do so, including when pupils or staff are away from the School
- Recognise vulnerable pupils and take action to promote their welfare, even if they are not suffering harm or are at immediate risk of harm
- Prevent impairment of pupils' mental health and physical health or development
- Consider wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare. This is known as **Contextual Safeguarding** (see Working Together to Safeguard Children (2026) and in Keeping Children Safe in Education (2026))

- Provide an environment in which pupils can learn to keep themselves safe, including on-line
- Take active steps to promote school attendance
- Understand the School's role in the safeguarding partner arrangements and to operate in line with locally agreed multi-agency safeguarding arrangements put in place
- Always act in the best interests of the pupil when concerned about their welfare
- Be aware that whilst all children should be protected, some groups of children are potentially at greater risk of harm than others, both online and offline
- Recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, that such experiences may affect a child's welfare, wellbeing, mental health and willingness to seek help, and ensure that concerns of this kind are considered within safeguarding practice
- Provide an inclusive, anti-discriminatory culture in which racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of the School's safeguarding responsibilities

2.2 The purpose of this Policy is to:

- Identify the members of the School's Child Protection team and explain their roles.
- Set out the School's expectations in respect of training
- Identify the different categories of abuse and neglect and provide guidance for recognising the indicators of possible abuse
- Explain the School's role in identifying and preventing specific safeguarding issues, including radicalisation and extremism (Prevent)
- Describe the procedures that should be followed if anyone in the School has a concern about the safety and welfare of a pupil
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable"
- Highlight the importance of early help - including community-based Early Help and Family Help (targeted early help)
- Outline the School's safer recruitment procedures for staff and volunteers
- Explain how allegations against staff will be handled
- Detail the School's whistleblowing procedures in relation to safeguarding
- Set out expectations regarding record keeping
- Explain how children will be kept safe through the everyday life of the School

- Outline how the implementation of this Policy will be monitored and managed by the School's Governing Body
- Provide a list of key contact details

2.3 This Policy should be read in conjunction with the following School Policies: Anti-Bullying, Staff Behaviour (Code of Conduct), Online Safety, Artificial Intelligence, Restrictive intervention including use of reasonable force, Learning Enrichment, Health & Safety, Missing Child and Child Missing Education, Attendance, Whistleblowing, Safer Recruitment, Low Level Concerns, Positive Behaviour, Relationships and Sex and Health Education, Administration of Medicines and Acceptable Use of Technologies.

All staff are required to read this Policy carefully and acknowledge that they have done so by signing the document held by the Director of People and Development.

2.4 The School is a registered charity, and therefore has a duty to: provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers; set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly; and have adequate policies, procedures and measures to protect people.

As a registered charity, the School is required to report all serious incidents, allegations or suspicions relating to pupils or other beneficiaries under the care of the School or by someone connected with the School e.g. a Governor, staff member or volunteer, to the Charity Commission promptly and in accordance with the guidance: How to Report a Serious Incident in your Charity (Charity Commission, June 2026). The School will tell the Charity Commission what action it has taken, or is planning to take, at the time of reporting the incident.

2.5 To reflect the scope and application of KCSIE (September 2026), this Policy applies at all times, including when pupils or staff are away from the School, whether they are on school-arranged activities or otherwise. The Policy also applies at all times, including out-of-school hours and during school holidays.

2.6 A brief definition of the following terms should add clarity and aid navigation of this Policy:

Governing Body – as the proprietor of the School.

Staff – this includes all those who work for, or on behalf of the School, regardless of their employment status, including contractors, supply staff, volunteers and Governors.

SLT – this is the Senior Leadership Team of the School, comprising of the Head, Senior Deputy Head, Deputy Head Pastoral, Director of Finance and Operations, and Director of People and Development.

Children's Social Care – depending on the context, this is the team based in Hammersmith & Fulham (where the School is located) or, where appropriate, the team based in the local authority where the child is resident.

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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

(Working Together to Safeguard Children, 2026)

2.7 The Governing Body of the School has overall responsibility for all matters which are the subject of this policy. The School has appointed and trained a number of Designated Persons (DPs) who have responsibility for Child Protection and Safeguarding matters.

2.8 The Designated Safeguarding Lead (DSL) is a member of the School Leadership Team and has ultimate lead responsibility for child protection matters at the School and is the first point of contact for external agencies that are pursuing Child Protection (CP) investigations. The DSL also coordinates the School's CP representation at conferences and meetings.

2.9 When concerns/incidents are reported, the DSL will decide whether a referral to the Local Authority (LA) Children's Services, Family Help or community-based Early Help (see Section 7) or other support is appropriate, in accordance with the referral thresholds set by the Local Safeguarding Children Partnership.

2.10 The role of the DSL is specified in the post holder's job description. (Appendix 1)

2.11 The DSL is supported by two Deputy Designated Safeguarding Leads (DDSL), a Safeguarding Governor, and a Deputy Safeguarding Governor. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility will not be delegated.

To ensure continuity of safeguarding responsibilities, the School maintains robust cover arrangements for periods when the DSL is unavailable due to illness, leave or other circumstances. In the DSL's absence, the DDSLs assume the DSL's function. Where both are unavailable, the Head should be contacted.

The school maintains the email address safeguarding@butehouse.co.uk. The School advises all safeguarding concerns to be sent to this email rather than any other. It is posted within the

safeguarding information on the School's website and parents are notified during annual information evenings. All mail sent to this address is automatically forwarded to the DSL, DDSLs and the Head so that concerns, notifications (including Operation Encompass notifications) are received, monitored, and acted upon without delay.

2.12 The Governing Body has nominated two of its members to take leadership responsibility for the School's safeguarding arrangements.

2.13 The Designated Safeguarding Leads at the School are:

- Designated Safeguarding Lead (DSL): Ellen Yap, Deputy Head Pastoral, member of the School Leadership Team and safeguarding responsibility for EYFS
- Deputy Designated Safeguarding Leads (DDSL): Nieves Garcia, Cover Coordinator and Samantha Morey, Year 3 Teacher
- Chair of the Board of Governors: Jonathan Beckitt
- Governors responsible for Child Protection and Safeguarding: Jo Farquharson and Amanda Barron

Parents are welcome to approach any of the above if they have concerns about the welfare of any pupil in the School, whether these concerns relate to their own child or any other.

The DSL's contact details are set out at the front of this Policy. The full in-school Safeguarding team and Head may also be contacted on the following email address in relation to any safeguarding concerns out of school hours: safeguarding@butehouse.co.uk.

2.14 When dealing with disclosures, concerns, suspicions and allegations, the DSL will follow the procedures set out by the School's Local Safeguarding Children Partnership – Hammersmith & Fulham's LSCP. Details of these may be found at by contacting: familyservices@lbhf.gov.uk

3. Recruitment of Staff & Training

The School is committed to creating a safe environment for children and follows 'Safer Recruitment' procedures that help deter, reject or identify people who might abuse children. The School follows the guidance from the Disqualification under the Childcare Act 2006 (2018). Please see the School's separate Safer Recruitment Policy for more details.

All staff and governors who take part in shortlisting or interviewing undertake safer recruitment training, refreshed at least every three years. At least one member of every shortlisting panel and every interview panel holds current safer recruitment training, for all appointments including support staff, peripatetic teachers, coaches and volunteers undertaking regulated activity. The Director of People and Development confirms before shortlisting begins that each panel meets this requirement.

It recognises that the relationships and associations that staff have in and out of school (including online), may have an implication for the safeguarding of children in school. Where this is the case, the member of staff must inform the Head.

The School will not knowingly employ people or allow them to be directly concerned in the management of the School, if they themselves are directly 'disqualified' from childcare.

Volunteers

Following the changes made by the Crime and Policing Act 2026, any person volunteering at a School in a role that involves teaching, training, instructing or supervising children frequently, on more than three days in a 30-day period, or overnight, is in regulated activity. The School obtains an enhanced DBS check with children's barred list information for every such volunteer before they begin, and has checked the children's barred list status of every existing volunteer who falls within regulated activity from 1 September 2026. Volunteers who are not in regulated activity (for example occasional, supervised helpers on a trip) are subject to a written risk assessment, recorded by the School, which determines what checks, if any, are required; under no circumstances is a volunteer on whom no checks have been obtained left unsupervised or allowed to work in regulated activity.

Early Years Foundation Stage

No member of staff or volunteer is permitted to begin working within the School, and therefore within the EYFS, until the School has received their enhanced DBS certificate including children's barred list information. Staff and prospective staff in the EYFS setting are required to disclose any information which may affect their suitability to work with children, including arrests, charges, convictions, cautions, court orders, reprimands and warnings, whether received before or during their employment. The School obtains two written references for any member of staff, student or volunteer before they are recruited. Full procedures are set out in the School's Safer Recruitment Policy.

3.1 All training will be carried out in accordance with the procedures of the Hammersmith & Fulham Local Safeguarding Children Partnership.

3.2 As part of their induction process, all new staff (including temporary staff and volunteers) are provided with the identity and function of the DSL and DDSLs, a copy of this Safeguarding Policy, as well as these Policies: Staff Behaviour (Code of Conduct), Low-Level Concerns, Anti-Bullying, Missing Child and Child Missing Education, Attendance, Online Safety, Whistleblowing, Acceptable Use of Technologies (AUP), a copy of Part 1 of KCSIE 2026, which all staff, including those who do not work directly with children, are required to read and will attend Prevent training. Prevent training will be provided every two years, for all staff, by Hammersmith and Fulham Borough. All new staff are required to complete Prevent training before joining the School.

3.3 All new and existing staff will receive a copy of, and are required to confirm that they have read and understood Part One of Keeping Children Safe in Education (KCSIE) 2026, the Staff Behaviour Policy (Code of Conduct), Low Level Concern Policy, Anti-Bullying Policy, Safeguarding (Child Protection) Policy, Positive Behaviour Policy, Acceptable Use Policy,

Missing Child and Children Missing Education Policy and Attendance Policy. The School will provide guidance and support to assist staff to understand and discharge their role and responsibilities. Staff are made aware that a safeguarding response may be necessary for Children Missing Education, or for pupils showing poor attendance and regular lateness.

3.4 The Head, all staff members and members of the Governing Body will undertake appropriate child protection and safeguarding training, which will also include advice on protecting children from radicalisation and online safety. Formal training will be carried out in accordance with LSCP guidance and will be updated on a regular basis and at least annually. All new staff undertake Level 2 safeguarding before their start date.

3.5 Additionally, the School will assess the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns, such as radicalisation, child sexual and criminal exploitation, child on child abuse including harmful sexual behaviour, sexual violence and harassment, teenage relationship abuse, domestic abuse, honour or faith-based abuse including female genital mutilation, online harms including cyberbullying and those involving artificial intelligence, serious violence and mental health and to ensure that staff have the skills, knowledge and understanding to keep Looked After Children safe and to manage a report of a safeguarding concern.

3.6 The DSL and DDSLs will undertake training to provide them with the knowledge and skills required to carry out the roles. The DSL and DDSLs have undertaken Level 3 Child Protection training, including inter-agency working, in accordance with LSCP procedures. They will attend refresher training at two yearly intervals and, in addition, keep up to date with safeguarding developments relevant to their role at least annually.

DSL and DDSL training include a good understanding of harmful sexual behaviour, local Family Help and community-based Early Help processes and criteria, Prevent (refreshed at least every two years) and the DSL's role as Key Adult for Operation Encompass notifications.

3.7 The DSL is required to undertake specific 'Prevent' awareness training and refer cases to the Channel programme where there is a radicalisation concern. The DSL will provide advice to other members of staff, giving them the knowledge and confidence to identify children who may be susceptible to radicalisation, to challenge extremist ideas and to know how to refer children for further help. The DSL monitors attendance at these sessions and checks understanding afterwards. Steps are put in place to accommodate absence or reinforce content, as necessary.

3.8 All members of staff are aware that corporal punishment is never used, nor is its use ever threatened.

3.9 All members of SLT (including the Head) and all Governors will read all of KCSIE.

4. Identifying Safeguarding Concerns

4.1 Abuse and Neglect

Abuse is a form of maltreatment of a child (anyone under 18 years of age). Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by those known to them or by strangers, including through online contact. Technology and the internet may be used to facilitate abuse that occurs both online and offline. Children may be abused by an adult or adults, by a member of staff or a group of staff, another child or children or by a pupil or pupils. Abuse and neglect are rarely standalone issues.

Children may also cause harm to other family members, referred to as child to parent or caregiver abuse.

A teacher who has consistent regular contact with a child has more opportunity to observe signs of abuse than anyone else with whom the child has contact and, in many cases, may be the first to see the child after the abuse has occurred. Staff are advised and regularly reminded to maintain an attitude of 'it could happen here' where safeguarding is concerned.

The School recognises that the exposure to or witnessing of abuse inflicted on others is on a par and can have the same impact upon children, as being the target of abuse.

4.2 Physical Abuse

Physical abuse is the causing of physical harm. It can lead directly to neurological damage, physical injury and disability. Some physical abuse is reactive; some may be premeditated with the intent to cause harm. Types of abuse include: hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, but may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that a pupil has been physically abused include: bruises, abrasions, burns, scalds, bite marks, fractures and scars.

Signs which may be indicators of concern include:

- Explanations provided for an injury which may not be consistent with the injury
- Parents/carers undisturbed or uninterested by an accident or injury
- Unexplained delay in seeking treatment for an injury
- Repeated presentation for minor injuries, which may represent a cry for help
- Reluctance to give information or mention previous injuries
- Children who flinch at sudden movements

4.3 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child which can cause severe and adverse effects on the child's emotional development. It has an important impact on a developing child's mental health, behaviour and self-esteem.

Types of emotional abuse include:

- Conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person
- Not allowing a child to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Verbal abuse, such as persistent criticism, belittling or name-calling, as well as persistently teasing or humiliating a child
- Imposing developmentally inappropriate expectations, such as interactions beyond a child's developmental capabilities, overprotection, limiting exploration or preventing normal social interaction
- Causing a child to feel frightened or in danger
- Exploitation or corruption of children
- Allowing a child to see or hear the ill-treatment of another
- Bullying (including prejudice-based) or cyberbullying

Signs of emotional abuse may be difficult to recognise as they are mainly behavioural.

From the parent/child relationship perspective they include:

- Abnormal attachment between the child and their parent
- Parents who frequently complain about their child, who never praise or give attention or who are emotionally distant from their child

From the pupil perspective, they include:

- Failure to thrive
- Behavioural problems such as aggression or attention-seeking
- Low self-esteem, lack of confidence and fearfulness, distress or anxiety
- Poor relationships such as withdrawn or isolated behaviour
- Delay in achieving developmental milestones

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

4.4 Sexual Abuse

Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration whether that is with part of person's body or an object (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching through clothing

- 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
- Grooming a child in preparation for abuse (including via the internet)

Sexual abuse can take place online as well as offline.

Sexual abuse is not solely perpetrated by adult males; women can commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. Child on child abuse is deemed a specific safeguarding issue in KCSIE and this can also take place using technology. All staff should be aware of the School's procedures for dealing with child on child sexual abuse (see 5.1).

Child sex abusers come from any professional, racial or religious background. Children under 16 years of age cannot provide lawful consent to any sexual intercourse. There are specific offences for children under 13, who can never provide valid consent to sexual activity, and specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agree to that activity.

Recognition of sexual abuse is difficult unless the child chooses to disclose and is believed, but signs are likely to be behavioural and emotional. There may be:

- Sexually explicit conversation or behaviour inappropriate to the child's age
- Self-harm, including eating disorders and self-mutilation
- Suicide attempts
- Running away
- Poor peer relationships, including unwillingness to be involved or communicate
- Sudden changes in behaviours or extreme mood swings
- Withdrawal and/or depression
- Inappropriately sexualised conduct

The School is aware of the statutory duty to report child sexual abuse introduced by the Crime and Policing Act 2026. This duty is not yet in force. The School will amend this Policy and brief all staff on their obligations once the duty is commenced and the accompanying statutory guidance is published.

4.5 Neglect

Neglect is the persistent failure to meet basic physical, emotional and/or psychological needs and is likely to result in the serious impairment of the child's health or development and long-term difficulties with social functioning, relationships and educational progress.

Types of neglect include failure to:

- Provide adequate food, clothing and shelter
- Protect a child from physical and emotional harm or danger or ensure adequate supervision
- Ensure access to appropriate medical care or treatment
- Respond to a child's basic emotional needs

Signs of general neglect include a child who:

- Is unkempt or inadequately clothed
- Is listless, apathetic or unresponsive
- Frequently and/or inexplicably comes to school hungry
- Has frequent accidents or injuries
- Thrives away from the home environment, but not in it

4.6 Child Criminal Exploitation

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into a criminal activity. This power imbalance can be due to age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited physically and/or online. Child Sexual Exploitation (CSE) is a form of child sexual abuse and can involve direct physical activity, as well as non-contact activities, as part of the grooming process, including via the internet.

The School understands child exploitation (at whatever level) to be on a par with abuse and neglect, in terms of the impact it can have upon a child.

Exploitation can be committed or facilitated by an organised network or gang, and the victim may identify as being part of that group. It is not possible for a child to consent to being exploited, abused or trafficked, and children may not recognise that it is happening to them; victims can be criminalised for actions taken under coercion and should be treated as victims. Exploitation and modern slavery are child abuse. Where a potential victim of criminal or sexual exploitation is identified, the DSL will follow child protection procedures and complete the relevant modern slavery referral (National Referral Mechanism) in accordance with the Modern Slavery statutory guidance.

4.7 Mental Health

The School recognises that mental health problems can be a sign or indicator of abuse, neglect or exploitation and will ensure that staff understand the indicators and complexities of the issues, through training and regular updates.

All staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or risk of suicide. They can also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem; staff are, however, well placed to observe children day-to-day and to identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one. Potential warning signs 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 has a mental health concern, but by identifying them staff can offer support and early intervention. Any interventions the School offers are evidenced as safe, effective and appropriate for the age and phase of the pupils. If staff feel that a child is in danger they will call 999 or arrange for the child to be taken to A&E immediately by a parent or other suitable person; if a child needs urgent help that is not an emergency, help is available from NHS 111 (mental health option).

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the School's Child Protection Policy and speaking to the DSL/DDSL.

All staff must flag up possible mental health problems in the following way:

- Identify and flag initial mental health concern with DSL/DDSL and add incident to CPOMs
- The DSL/DDSL will arrange a 1-1 discussion with the child, as deemed necessary
- If mental health concerns persist, the DSL/DDSL will contact the child's parents and discuss the concern, only after considering whether informing parents would place the child at additional risk before doing so
- In agreement with the child's parents, the DSL/DDSL will refer the child to the School Counsellor for 1-1 sessions
- The DSL or DDSL will meet with the School Counsellor for half termly updates to assess and monitor the nature of the concern. If the mental health concern escalates and the child needs specialist support, the DSL and School Counsellor will work together with the child's parents, to arrange a referral (see the School Counselling Policy)

4.8 Children Potentially at Greater Risk of Harm

Whilst this Policy applies to all pupils, the School recognises that some groups of children are potentially at greater risk of harm than others (both online and offline). Although not exhaustive, the list below highlights some of those groups:

- Children who need a social worker
- Children who are absent from education
- Children who are requiring mental health support
- Looked after and previously looked after children
- Care leavers
- Children with SEN, disabilities or health issues, including medical conditions
- Children who are lesbian, gay or bisexual; and children who are questioning their gender
- Young carers

5. Specific Safeguarding Issues

Abusive behaviours can be displayed in a variety of ways and can consist of sexual abuse/activity; physical harm; emotional and/or verbal abuse. Additionally, behaviours such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence, criminal exploitation (including that linked to county lines), radicalisation, and the consensual and non-consensual making or sharing of nudes or semi-nudes can be signs that children are at risk. These issues often overlap. KCSIE acknowledges the following as specific safeguarding issues:

- Bullying including cyberbullying
- Children missing education
- Children missing from home or care
- Child sexual exploitation
- Criminal exploitation of children, including 'county lines' and gangs.
- Domestic violence
- Drugs
- Fabricated or induced illness
- Honour or faith-based abuse (including female genital mutilation (FGM) and forced marriage)
- Gangs and youth violence

- Gender-based violence / violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults' strategy
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Making or sharing nudes and semi-nudes (including images generated by AI)
- Trafficking
- Modern slavery
- Teenage relationship abuse
- Child-on-child abuse (including harassment and violence)

Up-to-date guidance and practical support on specific safeguarding issues will be sought where necessary. The DSL and DDSL will attend relevant training and ensure that staff understand the indicators and complexities of the issues noted below.

5.1 Child-on-Child Abuse (including harassment and violence) and Harmful Sexual Behaviour

All staff are aware that children can abuse other children, on and off the School site and online, and that this is a safeguarding issue for both the victim and the alleged perpetrator. Child-on-child abuse can take many forms, including: bullying (including cyberbullying, prejudice-based and discriminatory bullying), discriminatory behaviour (including racism, faith-targeted abuse and other prejudice-based incidents), abuse in intimate personal relationships between children (teenage relationship abuse), physical abuse (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, harmful sexual behaviour, sexual violence and sexual harassment (which may include misogyny/misandry), the consensual and non-consensual making or sharing of nudes and semi-nudes, including images generated or altered using AI (see 5.14), causing someone to engage in sexual activity without consent, upskirting (see 5.2), and initiation/hazing-type violence and rituals. Online, child-on-child abuse can take the form of abusive, harassing and misogynistic/misandrist messages, the non-consensual sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

The School has a zero-tolerance approach to child-on-child sexual as made clear in KCSIE. It will not be passed off as "having a laugh", "banter" or "part of growing up", as this can lead

to a culture of unacceptable behaviour, misogyny, misandry and an unsafe environment for children. The School recognises that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously. Staff are alert to the times of the school day when children may be at highest risk (for example immediately after school) and do not minimise the risks of girl-on-girl abuse. Child-on-child abuse is preventable: staff know how to recognise behaviours and indicators of risk early, and that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence. Where staff have any concern about child-on-child abuse, whether it is thought to have taken place on or off site, they speak to the DSL or DDSL; where a report is received and the DSL or DDSL is not present, they must be informed as soon as practically possible.

Harmful sexual behaviour (HSB), sexual harassment and sexual violence can occur between two or more children of any age and sex, from primary through to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). HSB should always be considered within a child protection context. When assessing HSB the ages and developmental stage of the children involved is critical: sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years, or if one is pre-pubescent and the other is not, although a younger child may also abuse an older child where they hold power over them. HSB can progress on a continuum, and early intervention in inappropriate behaviour such as misogyny/misandry can help to prevent escalation to sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma and will be offered appropriate support. The DSL and DDSL have a good understanding of HSB and are familiar with local specialist support services for all children involved.

Any report will be taken seriously and will be addressed as per the Policy. Staff understand that even if there are no reports, it does not mean it is not happening. It may be the case that it is just not being reported, and they remain vigilant. Staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Consent is a key area in the School's Wellbeing curriculum. Children who are victims of sexual violence and sexual harassment 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. 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.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them. As always when concerned about the welfare of a child, all staff should act in the best interests of the child.

In all cases, the School follows safeguarding principles as set out in Part Five of KCSIE 2026 (Child-on-child sexual harassment and sexual violence). Following a report of sexual violence, the DSL (or DDSL) will carry out an immediate risk and needs assessment considering the victim's safety and support needs, potential other victims, the wider school community and the location and time of the incident; for a report of sexual harassment the need for a risk assessment is considered case by case. Risk and needs assessments are recorded, regularly reviewed and used to inform ongoing safeguarding decisions. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted, for example intra familial harms or siblings). Detailed advice is available in Part five of KCSIE 2026.

Staff are all aware of Part 5 of KCSIE referencing child-on-child abuse. Staff use lessons and assemblies to help children understand, in an age-appropriate way, what abuse is. The School's preventative education creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence and harassment, derogatory behaviour and other forms of physical violence and conflict, and helps pupils understand online harms such as sharing images, the prevalence of deepfakes and when and where to seek help. Pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. They are encouraged to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Staff are trained in how to receive a disclosure, and report an allegation to the DSL or DDSL, which must be recorded and investigated in-line with the School's safeguarding procedures, including a report of child-on-child sexual violence and sexual harassment, and understand that staff do not view or forward illegal images of children. Staff are aware of the additional guidance from the DfE on Searching, Screening and Confiscation and UKCIS advice in Sharing nudes and semi-nudes: advice for education settings (February 2024).

Pupils are taught about the responsible and safe use of the internet, social media and mobile devices in Computing and Wellbeing lessons and that it is a criminal offence to send an electronic communication (words and/or images) to another person with the specific intent to cause distress or anxiety. The School has an Online Safety Coordinator and children know who this is and that they can speak to them about concerns. Every Google Classroom or Seesaw for Middle and Upper School pupils has an 'online worry box' button, so children can report anything they have seen online, in and out of school hours. This 'online worry box' is checked each morning of the working week by the DSL, and any concerns are followed up within the working day.

If staff become aware of an incident involving the making or sharing of nudes or semi-nudes or any pupil behaviour that gives rise to a safeguarding concern, they must report it to a DSL or DDSL in accordance with the procedures set out in this Policy.

The School understands that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

The School is strongly committed to the prevention of bullying in any form. The School has an Anti-Bullying Policy and will consider all coercive acts and inappropriate child behaviour within a Child Protection context. The School will take advice from the LSCP in the investigation of such allegations and take the appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse.

5.2 Up skirting

Up skirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing parts of their body or clothing, not otherwise visible, to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Up skirting is a criminal offence. Attempting to commit an act of up skirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence, such as attempting to take a photograph on a telephone or camera, but failing to do so because of lack of storage or battery.

The School will treat incidences of up skirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures. All matters relating to up skirting images and devices which may have been used in connection with an allegation of up skirting will be dealt with in accordance with 5.14 (sharing nudes and semi-nudes) and the School's searching, screening and confiscation procedures.

5.3 Children Missing from Education

The School's attendance policy is set out in a separate document and is reviewed regularly by the Governing Body. The School follows the Government's 'Working Together to Improve School Attendance' (2026) statutory guidance which sets out how schools must work with the local authority children's services where school absence indicates safeguarding concerns.

The School recognises that full attendance at school is important to the wellbeing of all pupils and enables them to access the opportunities made available to them at school. Attendance is monitored closely and the School works in partnership with Hammersmith & Fulham's ACE Team when patterns of absence give rise to concern. Where a pupil has a social worker, the School informs the social worker of any unexplained absence. The School supports the local authority in joint reasonable enquiries to identify and support children missing education, and makes the New Pupil, Deletion, attendance and sickness returns required by the School

Attendance (Pupil Registration) (England) Regulations 2024 (see Section 16). Where severe absence for unauthorised reasons continues despite all avenues of support, the School recognises that this may constitute neglect and will consider a referral to Children's Social Care. Where a pupil is looked after by a local authority, the School liaises with the pupil's social worker and with the Virtual School Head at the authority that looks after the child in relation to any attendance concern.

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of the School's unauthorised absence procedures and children missing education procedures. The School will ensure, where possible, that it has more than one emergency contact number for each pupil. This will give the School additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

5.4 Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. CSE can be committed by an individual or an organised network, and most sexual abuse is committed by those previously known to the victim. Victims are not always recognised and can be criminalised for actions they take whilst under coercion. Where a potential victim is identified the DSL will follow child protection procedures and complete the relevant modern slavery referral (see 4.6). A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Further information can be found at www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited

5.5 Honour or faith-based abuse (including FGM and forced marriage)

Honour or faith-based abuse (HBA) encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Staff maintain an attitude of 'it could happen here' and keep an open mind about this form of abuse.

As with all matters pertaining to the maintenance of a safeguarding culture within the School, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL without delay. The DSL will take further advice from the LSCP and make a referral where this is deemed necessary.

5.6 Female Genital Mutilation (FGM)

Staff should be alert to the possibility of a girl being at risk of, or already having suffered, FGM (sometimes referred to as female circumcision). Victims are likely to come from a community that is known to practise FGM. The age at which FGM is carried out varies enormously and may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.

There is a range of potential indicators that a pupil may be at risk, the most pertinent at the School being a parent asking for an extended period of time away from school with an unconvincing explanation for the absence. FGM may already have happened if a girl has difficulty walking, sitting or standing or spending longer than usual away from a classroom during the day with bladder problems.

Concerns should be reported immediately to the DSL, who will involve the LSCP as appropriate. If a member of staff discovers that FGM appears to have been carried out on a child, they should personally report this directly to the police. This is a mandatory duty for teachers.

Teachers are under a mandatory duty (section 5B of the Female Genital Mutilation Act 2003) personally to report to the police, in the course of their professional duties, any case where a girl under 18 informs them that an act of FGM has been carried out on her, or where they observe physical signs which appear to show that an act of FGM has been carried out and have no reason to believe it was necessary for her physical or mental health or connected with labour or birth. The report should be made as soon as possible and, as best practice, by the close of the next working day; a longer period (never more than one month) is appropriate only in exceptional cases, for example where an immediate report is likely to create an immediate safeguarding risk to the child or a sibling and consultation is needed first. The teacher should also inform the DSL, who will involve the LSCP as appropriate.

Further information can be found at:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

5.7 Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Some communities use perceived cultural practices 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 eighteenth birthday, even if violence, threats or another form of coercion are not used.

Further information can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf

<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible>

5.8 Preventing Radicalisation

The School recognises its responsibility to protect children from being radicalised or drawn into terrorism. The School supports the 'Prevent Strategy', which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism, and abides by the Notice, Check, Share guidance (2026).

Factors that may make a child more susceptible to radicalisation include:

- Family tensions
- Sense of isolation / low self-esteem / feeling of failure
- Distance from cultural heritage / events affecting the pupil's country or region
- A sense of grievance triggered by personal experience

Early indicators of radicalisation or extremism may include:

- Becoming involved with a new group of friends
- Searching for answers to questions about identity, faith and belonging
- Expressions of support for terrorism, justifying the use of violence to solve real or perceived grievances
- Possessing or accessing extremist materials
- Changes in behaviour or language

The National Prevent Referral Form further lists concerning behaviours to include:

- Absenteeism
- Abusive behaviour

- Anti-social behaviour
- Becoming socially isolated
- Changes in appearance
- Becoming closed to challenge
- Concerning use of the internet
- Becoming confrontational
- Expression of extremist views
- Fixation on a particular topic or group
- Interest in conspiracy narratives
- Interest in extremist groups/causes
- Interest in weapons
- Legitimising use of violence
- Quick to anger/use of violence
- Seeking to recruit
- Self harm
- Substance misuse
- Sudden abandonment of interests
- Support for gender-based violence
- 'Them and us' language
- Use of inflammatory language
- Use of symbolism linked to extremism

It is important to note that children experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour, including those already detailed in this Policy. The School recognises that there is no single profile of a radicalised person and no single pathway to radicalisation, that susceptibility to radicalisation may be linked to vulnerability but that not all children susceptible to radicalisation will be vulnerable, and that it should be alert to non-violent as well as violent extremism, including divisive or intolerant narratives which can reasonably be linked to terrorism.

Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs or alcohol. The School works within the curriculum to promote tolerance and respect for diverse views, while challenging prejudice

of any kind. Bute House Preparatory School is an inclusive school, which values citizenship and a sense of belonging. Pupils are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others.

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation) whether these come from within their family or are the product of outside influences.

The DSL, as Prevent Lead, maintains a written Prevent risk assessment which considers how pupils or staff may be at risk of being radicalised into terrorism, including online, proportionate to the threat and risk in the local area and the age of the pupils. Where specific risks are identified an action plan sets out the steps the School will take to mitigate them. The risk assessment is reviewed annually and reported to the Safeguarding Governor.

Any member of staff, pupil or parent who is concerned that a child may be susceptible to radicalisation reports the concern to the DSL in the same way as any other safeguarding concern. The DSL assesses the concern, seeking advice from the local authority Prevent lead or the police where unsure, and considers whether the child may instead be more suitably supported through another form of safeguarding referral. Where a Prevent referral is appropriate the DSL makes it using the Prevent national referral form. Where a referral is adopted by the Channel panel (see *Channel Duty Guidance 2023*) the School co-operates with the panel and the police as reasonably practicable, responds to requests for information from the Channel case officer within five working days, and passes on any new information that comes to light while a referral is being assessed. Where a child who has received Channel support leaves the School, relevant information about that engagement and its outcome is transferred securely within the child protection file.

The School has clear protocols for ensuring that any visiting speaker, whether invited by staff or by pupils themselves, is suitable and appropriately supervised for the duration of their visit. Before agreeing to host a speaker the School undertakes its own due diligence to understand any risk around that speaker and considers whether the views likely to be expressed are used to encourage people into participating in or supporting terrorism or are shared by terrorist groups, or would undermine the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The School will not provide a platform for the encouragement of terrorism, which is a criminal offence. Leaders take appropriate steps to ensure that, when political views are expressed to pupils, an appropriate balance is always supplied. All visiting speakers will be required to complete the form as listed in Appendix 5.

Further information can be found at:

www.gov.uk/government/publications/prevent-duty-guidance

5.9 Children left at home alone

This is potentially dangerous for children both physically and emotionally. If a member of staff is concerned about this, they should inform the DSL or the Head. The DSL or the Head may decide to contact the parents, on their return, to express serious concern about the incident, highlighting the risks to the child.

Reassurance will be sought from the parents that such a situation will not be repeated. If such reassurance is refused and the child continues to be left at home alone, the DSL should contact the LSCP.

5.10 Private Fostering

If the School becomes aware that one of its pupils is being cared for 28 days or more by someone who is not their parent or a close relative, the School will refer the arrangement to the LA Children's Services. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

5.11 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 are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

5.12 Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children as victims in their own right if they see, hear or experience the effects of abuse and are related to, or under the parental responsibility of, the victim or perpetrator. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent or care-giver abuse. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Economic
- Emotional
- Controlling or coercive behaviour
- Violent and threatening behaviour

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs. The School recognises that exposure to domestic abuse 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. Domestic abuse can also occur within children's own intimate relationships (teenage relationship abuse), including physical, sexual and emotional abuse and stalking; both young victims and young perpetrators will be offered support.

Operation Encompass

Since November 2025 the police have been under a statutory duty to notify a child's school, and where relevant the local authority, where they have reasonable grounds to believe a child may be a victim of domestic abuse, including where the child was not physically present at the incident. The School participates in Operation Encompass. The DSL is the School's Key Adult and, with the DDSL and Head, receives notifications through the confidential safeguarding mailbox before the start of the next school day so that appropriate emotional and practical support can be put in place for the child from the point of their arrival at school. Notifications contain personal and sensitive information; they are held securely on CPOMS with restricted access, are shared only with those staff who need to know in order to support the child, and are handled in accordance with data protection laws. A notification does not replace the School's usual safeguarding procedures: where the DSL is concerned about a child's welfare a referral to Children's Social Care will be made in accordance with local thresholds, and the School and the police maintain open communication about where a referral should be made.

5.13 Serious Violence

Staff are aware of the indicators, which may signal 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

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.

All staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

- being male
- having been suspended, spent time in alternate provision or permanently excluded from school
- having experienced child maltreatment

- having been involved in offending, such as theft or robbery
- having used drugs or alcohol in early adolescence
- having previously been a victim of, or previously perpetrated, violence

Serious violence may involve physical assault or carrying, threatening with or using weapons, often in the context of peer conflict or bullying, and can be associated with criminal exploitation. Staff report any concern about a child carrying or using a weapon, or expressing an intention to do so, to the DSL or DDSL. The DSL assesses the risk to the individual pupil and to others in the School, considering any wider information or concerns, takes appropriate action and, depending on the risk, puts in place a safety and support plan and, where relevant, action to de-escalate peer conflict. The School is alert to the times and places around the school day when children may be at highest risk, listens to pupils and consults staff about where they feel unsafe, and works with partners to promote safety. Early, evidence-based support - access to trusted adults, social and emotional skills support and targeted interventions are provided for children considered at risk.

5.14 Sharing nude and semi-nude images

The School will act in accordance with UKCIS advice Sharing nudes and semi-nudes: advice for education settings working with children and young people (February 2024) and Part five of KCSIE 2026.

'Making or sharing nudes and semi-nudes' means the creation, sending or posting of nude or semi-nude images (photographs, videos or livestreams) by young people under 18, whether taken by the child themselves or by another person, and includes images that have been digitally altered or wholly generated using artificial intelligence ('deepfakes' or 'deep nudes'). Such images are indecent images of children in law, including where they are AI-generated 'pseudo-images', and incidents involving them are treated in the same way as any other incident. All incidents, whether the sharing was consensual or non-consensual, are dealt with as safeguarding concerns and require a safeguarding response, with a proportionate approach that considers the age, development and circumstances of the children involved and any element of coercion, exploitation or vulnerability. The primary concern at all times is the welfare and protection of the young people involved.

All incidents of sharing nudes and semi-nudes, whether the sharing was consensual or non-consensual, will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved.

Young people who share nudes and semi-nudes of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. The School will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of sharing nudes and semi-nudes should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to sharing nudes and semi-nudes is more or less serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff

may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about an issue of sharing nudes and semi-nudes in relation to a device in the possession of a pupil (e.g. mobile phone, tablet, digital camera,) the member of staff will secure the device (it should be confiscated). This is consistent with DfE advice "Searching, screening and confiscation: advice for schools" (DfE July 2022).

Staff will not look at, share or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).

The DSL will discuss the concerns with appropriate staff and speak to the pupils involved as appropriate. Parents and carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the pupil at risk of harm.

Initial Review and Referral

The DSL will hold an initial review meeting with appropriate staff and, where appropriate, speak to the pupils involved, and will establish who created the image (including whether it is AI-generated or digitally manipulated), how it was shared and by whom. An immediate referral to the police and/or Children's Social Care will be made if any of the following apply:

- The incident involves an adult (including an adult posing as a child)
- There is reason to believe a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example owing to special educational needs)
- What is known about the images suggests content that depicts sexual acts which are unusual for the child's developmental stage, or are violent
- The images involve sexual acts and any child in them is under 13
- There is reason to believe a child is at immediate risk of harm owing to the sharing, for example because they are presenting as suicidal or self-harming

If none of these apply the DSL, with input from the Head and SLT, may decide that the incident can be managed within the School's Positive Behaviour Policy without involving the police or Children's Social Care; this decision is made only where the DSL is confident that there is enough information to assess the risks to every child involved, is recorded with reasons, and may be revisited at any time if further information emerges. The School recognises that children of primary age may create or share such images out of curiosity, risk-taking or naivety rather than sexual intent, and that in such cases police or social care involvement may not be proportionate; the DSL will use professional judgement in the specific context.

The DSL will make a judgement about whether or not a situation in which nudes and semi-nudes have been shared with a small number of others in a known friendship group with no previous concerns requires referral under the criteria above or whether the School is able to contain the situation in partnership with all parents of the pupils involved, arrange for the

parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will consult with the police and the Single Point of Access to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

Viewing the imagery

Adults should not view nudes and semi-nudes unless there is a good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network

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

- never copy, print, share, store or save the imagery; this is illegal, and if it has already happened the police will be contacted for advice
- discuss the decision with the Head
- ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the Head
- ensure viewing takes place with another member of staff present in the room, ideally the Head, or a member of the Senior Leadership Team. The other staff member does not need to view the images.
- wherever possible ensure viewing takes place on School premises, ideally in the Head's or DSL's office
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the pupil's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the standards for recording safeguarding incidents set out in statutory safeguarding guidance and local safeguarding procedures
- Where a device needs to be passed to the police, the DSL will confiscate it, disconnect it from Wi-Fi and mobile data and switch it off immediately to prevent remote deletion, keep it in a secure locked place until collected, and call the police. Any member of staff who has viewed the imagery is offered appropriate support

Deletion of images

If the School has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery. In most cases the children involved will be asked to delete the images across all devices, online storage and social media and to confirm that they have done so by a stated deadline. They will be reminded that possession of nudes and semi-nudes of a child is illegal and that if they refuse, or it later emerges that they did not delete them, they are continuing to commit an offence and the police may become involved. Any decision to search a pupil's device and delete imagery is based on the DSL's professional judgement and complies with this Policy and the School's searching, screening and confiscation procedures. All decisions, with times, dates and reasons, are recorded on CPOMS, and parents are informed unless doing so presents a further risk to any child. All incidents relating to the sharing of nudes and semi-nudes are recorded, whether or not they are referred to external agencies.

5.15 Pupils who are lesbian, gay or bisexual or pupils who are questioning their gender

The fact that a child or a young person may be lesbian, gay, bisexual or questioning their gender is not in itself an inherent risk factor for harm. However, children who are, can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or questioning their gender (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual or are questioning their gender. Risks can be compounded where children who are lesbian, gay, bisexual or are questioning their gender lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. Acceptance of diversity is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse. The School uses such lessons to prevent homophobic and biphobic bullying, and applies a zero tolerance policy for abuse of this nature.

Pupils who are questioning their gender

It is not for the School to initiate any action in this area; this section applies where a pupil or her parents raise a request relating to social transition to which the School must respond. The School is mindful that it is common for children to engage in activities less typically associated with their sex and that some young children go through a period of questioning their gender which for the majority does not continue. Staff take time to understand the thoughts and feelings of a pupil who is questioning her gender, are professionally curious about the full range of her experiences, and are aware of potential vulnerabilities, including complex mental health and psychosocial needs and discriminatory bullying, which is never tolerated. The School maintains flexibility and avoids rigid rules based on gender stereotypes.

Any request for support with social transition is treated as a safeguarding matter. Members of staff do not adopt any change relating to social transition unless a decision has been made

by the School with the pupil's parents involved as set out here. In considering a request the School:

- starts from the best interests of the child and of other children, recognising that the decision may not be the same as the child's wishes
- engages parents as a matter of priority and gives their views great weight, unless in rare circumstances involving them would constitute a greater risk to the child than not involving them, in which case the DSL determines what action is needed before parents are contacted or any decision is taken
- involves the DSL and, where relevant, the SENCO, and considers any clinical evidence or advice and any wider health or neurodiversity issues
- exercises particular caution as a primary school, recognising that social transition is an active intervention with potentially significant effects and that support for full social transition would be agreed very rarely and never without appropriate clinical involvement
- documents its decision-making and keeps records
- reviews any decision at appropriate points, involving the DSL immediately if a review is considered, and has reviewed any arrangements agreed before KCSIE 2026 came into force

Where a pupil confides in a member of staff but does not ask the School to make changes, there is no reason to break the confidence unless there is a related safeguarding risk.

Supporting any degree of social transition will not include allowing access to toilets, changing rooms or, on residential trips, sleeping accommodation designated for the opposite sex, nor participation in any sport designated single-sex for safety reasons; the School explains these constraints sensitively to the pupil and her family. Where a pupil does not wish to use the facilities designated for her sex the School considers whether an alternative (for example a self-contained, lockable single-occupancy facility) can be provided without compromising single-sex provision or the safety, comfort, privacy or dignity of any child, keeps a clear record of the arrangement and reviews it regularly. The School records every pupil's biological sex at birth accurately wherever it is recorded and ensures that all relevant staff are aware of it. The School is conscious of the particular vulnerabilities of any child who has socially transitioned from an early age and may be 'living in stealth', and of any child who wishes to reverse a previously agreed change, and involves the DSL and works closely with parents and relevant experts in such cases.

The School's RSHE teaching is consistent with the DfE statutory guidance (July 2025): the School does not teach as fact that all people have a gender identity.

5.16 Children with SEND and physical health concerns

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

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- children with SEND or certain medical conditions can be disproportionately impacted by issues such as bullying without outwardly showing any signs
- children with SEND can be more prone to peer group isolation than other children
- communication barriers may exist causing difficulty with managing or reporting these challenges, and the risk they do not understand that what is happening to them is abuse
- the need for intimate care or that these children are more likely to be dependent on adults for care
- that these children may be unable to understand the difference between fact and fiction in online content and may repeat the content or behaviours in school without understanding the consequence

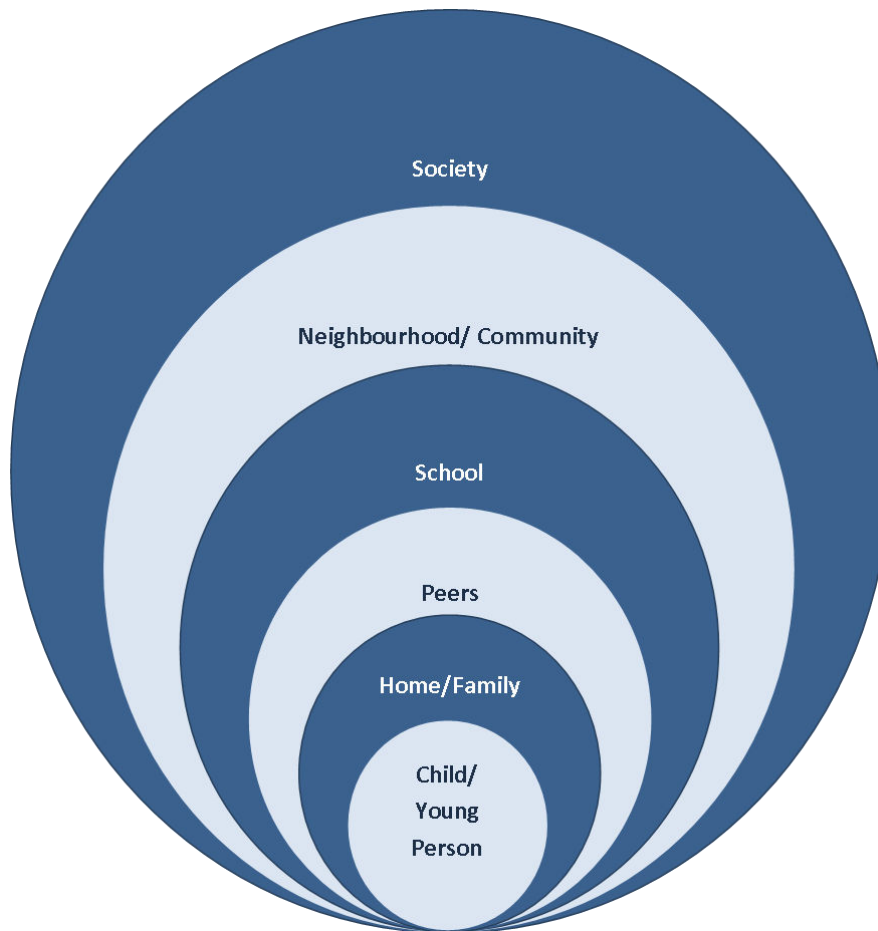
In such cases, additional pastoral support for children with SEND should be considered if there are any concerns that the child might be at risk.

An incident relating to the management of a pupil's medical condition (including allergies) does not in itself warrant a safeguarding referral. A referral is needed only where the incident raises concern that the pupil may be at increased risk of neglect, abuse or exploitation because of her condition, for example where relevant information about the condition is withheld from the School or a pupil is repeatedly sent to school without essential medication.

5.17 Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff, but especially the DSL (and Deputy DSL) should consider the context within which such incidents and/or behaviours occur i.e. whether children are at risk of abuse or exploitation in situations outside their families.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation (including financial exploitation), teenage relationship abuse, county lines, radicalisation, and serious youth violence. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. The image below shows the contextual circles of safeguarding:



Children's social care services assessments should consider such factors, so it is important that the School provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare. Interventions should focus on addressing these wider environmental factors.

5.18 Young Carers

The School is alert to the needs of young carers, recognising that caring responsibilities can affect attendance, attainment, behaviour and wellbeing. Early identification is essential so that young carers receive support at the right time, including from external partners and local authority and health services.

5.19 Children with a family member in prison

Children who have experienced parental imprisonment are at risk of poor outcomes as a result of poverty, stigma, isolation and poor mental health and are more likely to be absent from

school. Staff understand the need for tailored, trauma-informed and sensitive support; the Prisoners' Families Helpline offers free confidential support.

5.20 Homelessness and temporary accommodation

Being homeless or at risk of homelessness presents a real risk to a child's welfare. The DSL is aware of local housing authority contact details and procedures. From 1 September 2026 local housing authorities are under a duty to notify a child's school when the child is placed in temporary accommodation; such notifications are received by the DSL and used to safeguard and support the child at the earliest opportunity, and do not replace a referral to Children's Social Care where a child has been harmed or is at risk of harm.

6. Responding to concerns about the safety and welfare of a child

6.1 The School acknowledges that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, or schoolwork. Staff should be aware pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. In such cases, staff should still exercise professional curiosity.

6.2 Concerns about a child may arise from:

- Observation of the child's behaviour or appearance
- Things the child has said
- A third party (another pupil, parent or guardian) expresses concern
- Receipt of an anonymous allegation

6.3 When there is suspicion of abuse, or a child tells of abuse, the member of staff must make a casual enquiry, without asking leading questions, about how an obvious injury was sustained or why the child appears upset. They should not, however, enter into a detailed investigation of the symptoms or causes of the child's distress or injury, as such an approach could prejudice later formal investigations.

Staff must not offer confidentiality to the child. This is not realistic. The member of staff should explain to the child that they need to pass on the information in accordance with this Policy.

The member of staff must:

- Observe carefully the child's behaviour and demeanour and show an understanding that it takes courage to disclose this information
- Record in detail what they have seen and heard and when they did so. Any comment by the child concerned or by an adult (who might be the abuser), should be recorded, preferably quoting words actually used, as soon as possible after the comment has

been made. Records should include how the concern was followed up and resolved and should include a note of any action taken, decisions reached and the outcome

- Reassure the child and explain what will happen next
- Report suspicions, immediately, and in any event on the same day, in accordance with the procedures in this Policy

6.4 If a third party expresses concern about a child, the member of staff to whom a third party expresses concern must:

- Observe the behaviour and demeanour of the person expressing concern, if done in person
- Record in detail what they have seen and heard and when they did so. Actual words used should be quoted where possible
- Report suspicions, immediately, and in any event on the same day, in accordance with the procedures in this Policy

The third party may seek confidentiality and anonymity. Whilst being sensitive to this request, no guarantee should be given as, in the interests of the child and if legal proceedings should follow, the identity of the third party may have to be disclosed.

Where another pupil expresses concerns, it should be remembered that such an action may be traumatic for the informer and support should be given.

6.5 A member of staff in receipt of anonymous allegations about child abuse must:

- Record in writing the words used, as far as possible, where the allegation is by telephone or retain the paper, where it is in writing
- Report suspicions, immediately, and in any event on the same day, in accordance with the procedures in this Policy

6.6 Action by staff in all cases

Dates, times and content of all interviews and actions in relation to the suspected abuse, should be recorded and signed by the observer and/or enforcer. Records must be accurate, factual, legible and contemporaneous; they may be used in court at a later date. Records should include how the concern was followed up and resolved and should include a note of any action taken, decisions reached and the outcome. The School uses the online software CPOMS for recording all safeguarding, welfare and pastoral issues (see Appendix 3).

6.7 Members of staff with a concern or receiving a disclosure should report the matter in accordance with the procedures.

6.8 The child's parent will normally be contacted and kept informed of any action to be taken under this Policy. The decision as to when to contact parents will be made by the DSL, who will consider whether doing so would place the child at additional risk. However, there may be circumstances when the DSL will need to consult the Head, the Local Authority

Designated Officer, Children's Social Care and/or the police before discussing details with parents. In all cases, the DSL will be guided by Hammersmith and Fulham Local Safeguarding Children Partnership referral threshold document.

6.9 Staff should share information on a need-to-know basis only and should not discuss the issue with colleagues, friends or family. Staff do not assume that someone else will pass on information that may be critical to keeping a child safe. Data protection laws (the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025) do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare, and fears about sharing information must not be allowed to stand in the way of the need to safeguard a child; if in any doubt staff speak to the DSL.

7. Early Help

7.1 Early help means providing support as soon as a problem emerges at any point in a child's life. It is provided at two levels: universal services and community-based Early Help, which is the support delivered through universal services such as the School, health services and community services, and Family Help, which is coordinated by the local authority and its partners and comprises targeted early help for children and families with multiple or complex needs, and statutory support under section 17 of the Children Act.

Family Help is a voluntary approach requiring the family's consent. It is led by a lead practitioner, who need not be a social worker, under a Family Help plan.

Where a pupil would benefit from additional support but has not suffered and is not likely to suffer significant harm, Family Help or community-based Early Help rather than a child protection referral may be appropriate. Safeguarding staff are aware of the local criteria, including the level of need, for referral to Family Help and to Children's Social Care under section 47, as set out in the Hammersmith & Fulham threshold document. Where a child would benefit from co-ordinated early help from a number of agencies, an early help inter-agency assessment should be arranged.

7.2 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 she has a statutory Education, Health and Care Plan)
- has a mental health need or is suffering from mental ill health
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home

- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs
- has returned home to her family from care
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

7.3 Effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help, with clear referral routes between universal and community-based early help and targeted Family Help
- undertake a Family Help assessment, which considers the needs of all members of the family
- provide targeted support through Family Help to address the assessed needs of a child and their family, which focuses on activity to significantly improve the outcomes for the child
- co-ordinate and provide support as part of a Family Help plan, which continues as the family's needs change

7.4 All staff should be aware that providing early help is more effective in promoting the welfare of children than reacting later.

7.5 All staff should be aware of the early help process and understand their role, which includes:

- identifying emerging problems
- discussing early help requirements with the DSL
- sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment

7.6 A member of staff or volunteer who considers that a pupil may benefit from early help should, in the first instance, record these concerns, and then immediately discuss them with the DSL. The DSL will consider the appropriate action to take in accordance with the Hammersmith & Fulham Local Safeguarding Children Partnership referral threshold document.

7.7 If early help is appropriate, the DSL should support the staff member in liaising with other agencies, where targeted support is needed, in making a referral for a Family Help assessment. The assessment is carried out by the local authority's Family Help Lead Practitioner, with the school contributing information and attending meetings as required. A Family Help assessment is not a prerequisite for a referral to Children's Social Care, but where one has been undertaken it will be used to support a referral. The DSL should keep the case under constant review and consider referring the case to the LA Children's Services if the child's situation does not improve.

8. Safeguarding Procedures - Reporting Concerns

8.1 Concerns about a pupil's welfare

If a member of staff is concerned about a pupil's welfare, they are required to follow the procedures in this Policy and report their concern to the DSL immediately. If the DSL is unavailable, the report should be made to the DDSL or, in the absence of DSL/DDSL, in accordance with the cover arrangements in section 2.11. See below for the procedures for dealing with allegations against staff and volunteers.

On being notified of a concern, the DSL will consider the appropriate course of action in accordance with the Hammersmith & Fulham Local Safeguarding Children Partnership referral threshold document. Such action may include early help community-based Early Help or a referral to Family Help or a referral to Children's Social Care.

If it is decided that a referral is not required, the DSL will keep the matter under review and consideration will be given to a referral to Children's Social Care if the pupil's situation does not appear to be improving.

Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.

In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral to Children's Social Care. Staff are reminded that anyone can, and should, make a referral to Children's Social Care if they have concerns about a child. This includes if they feel they have voiced such a concern but the School has taken it insufficiently seriously. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

8.2 If a child is in immediate danger or at risk of harm

If a pupil is in immediate danger or is at risk of harm, a referral should be made to Children's Social Care and/or the police immediately. Anybody can make a referral in these circumstances; parental consent is not required. See below for details on making a referral.

If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

In-line with KCSIE, where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

The School is aware of the statutory duty to report child sexual abuse introduced by the Crime and Policing Act 2026. This duty is not yet in force. The School will amend this Policy and brief all staff on their obligations once the duty is commenced and the accompanying statutory guidance is published.

8.3 Female genital mutilation

Teachers must report to the police known cases of FGM in under 18s. See above for further information about FGM and this reporting duty.

8.4 Making a referral

The relevant contact information is set out at the front of this Policy. If the referral is made by telephone, this should be followed up in writing.

Confirmation of the referral and details of the decision as to what course of action will be taken, should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact Children's Social Care again. Information must be shared with the minimum of people and the child concerned given clear avenues of support and communication.

If, after a referral, the child's situation does not appear to be improving, the DSL (or the person who made the referral) should press for reconsideration to ensure their concerns are addressed and that the pupil's situation improves.

If the DSL remains dissatisfied, the concern will be escalated in line with the LSCP's escalation and professional-challenge procedure. Where the School considers that an incident involving a pupil may meet the criteria for a serious child safeguarding incident (death or serious harm where abuse or neglect is known or suspected), the DSL will inform the safeguarding partners so that they can consider a serious incident notification, and the School will co-operate with any rapid review or local child safeguarding practice review.

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

9. Vulnerable pupils

9.1 The School will always ascertain the views and feelings of all children, acknowledging the additional needs for support and protection of children who are vulnerable by virtue of:

- special educational needs (SEN)
- disability
- the effects of substance abuse within the family
- being a young carer
- joining the School mid-year
- having been excluded from the School
- having English as an Additional Language, particularly if they are very young, and using a translation service if necessary

The School is alert to the needs of young carers (see 5.18) and, in its online safety teaching, considers how to tailor its offer for pupils who may be more susceptible to online harm, for example looked after children and those with SEND.

9.2 Staff must understand that additional barriers can exist when recognising abuse and neglect in these children:

- Staff may assume that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or situation. Further exploration is essential
- The child can be disproportionately impacted by things like bullying, without outwardly showing any signs
- The child may have communication barriers and difficulties in overcoming these barriers

10. Allegations of abuse against staff, volunteers and contractors

10.1 The School takes seriously all allegations made against members of staff (including the DSL, volunteers, temporary and visiting staff, supply teachers, trainee teachers, students on work experience or any individual or organisation using the school premises for the purpose of running activities for children outside of normal school hours), or any adult working for, or on behalf, of the School, whether paid or unpaid, that call into question their suitability to work with or be in a position of trust with children, whether regarding events in their private or professional life. The School's procedures for dealing with allegations against staff follow Part 4 of KCSIE.

10.2 If the School receives an allegation relating to an incident where an individual or organisation was using the School premises for running an activity for children, the School's

safeguarding policies and procedures will be followed and the LADO will be informed, as with any safeguarding allegation.

10.3 The School has procedures to deal with any allegations that a member of staff has:

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

10.4 All allegations against a member of staff, supply teacher or volunteer must be brought immediately to the attention of the Head. If the Head is unavailable, the Chair of Governors should be told at once. The Head will work in conjunction with any contractor or supply agency if one of their staff is the subject of an allegation. Where an allegation concerns a supply teacher, trainee teacher or contracted member of staff, the School shares safeguarding responsibility with the employment agency, business or initial teacher training provider. The School remains responsible for gathering the facts and managing the safeguarding process, working closely with the agency or provider, which will usually lead on any disciplinary action. The LA's Designated Officer (LADO) must be informed, within one working day and before any further action is taken, of all allegations that appear to meet the criteria set out in 10.3 above.

10.5 If an allegation is made against the Head, or if it is not possible to report a concern or allegation to the Head because there is a conflict of interest in doing so, the member of staff must immediately inform the Chair of Governors without the Head being informed first.

10.6 An allegation against any member of the Governing Body must also be reported to the Chair of Governors. The Chair must inform the LADO of any such allegation that appears to meet the criteria set out in 10.3 above, within one working day and before any further action is taken. Concerns about the Chair of Governors should be raised directly with the LADO. Where the Chair of Governors is either not available or is the subject of the concern or allegation, reports should be made to the nominated Safeguarding Governor.

10.7 Many cases may not meet the criteria set out above or may do so without warranting either a police investigation or enquiries by the LA. The procedures for such cases are set out in the School's Low-Level Concerns Policy.

10.8 All discussions should be recorded in writing and any communication with both the individual concerned and the parents of the child/children agreed with the LADO and other agencies, as appropriate.

10.9 Some rare allegations will be so serious they will require immediate intervention by the LA and/or police. In such cases, referral to the LADO will lead to a strategy meeting or

discussion being held in accordance with the DfE guidance and LSCP procedures. This process will agree upon the appropriate course of action and the timescale for investigations.

10.10 The School has a duty of care towards its employees and, as such, it must ensure that effective support is provided for anyone facing an allegation. The School will act in accordance with Part 4 of KCSIE and the School's employment procedures.

10.11 When an allegation is made, the School will make every effort to maintain confidentiality while it is being investigated or considered. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation, in certain circumstances, will be observed.

10.12 Allegations that are found to be malicious will be removed from personnel records; for all other allegations, full details will be recorded on the confidential personnel file of the person accused. Any that are false, unsubstantiated or malicious, will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

10.13 The School will retain all safeguarding records and relevant personnel records at least until the accused has reached normal pension age or for a period of ten years from the date of the allegation if that is longer.

10.14 Children that are found to have made malicious allegations are likely to have breached the School's Behaviour Policy and disciplinary action may be taken. Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

10.15 The resignation of a member of staff, supply teacher or volunteer mid-way through an investigation would not lead to the investigation being abandoned.

11. Whistleblowing Procedures

11.1 The School's Whistleblowing Policy is referenced in staff training and induction and staff codes of conduct.

11.2 The School has a culture of safety. Staff, supply teachers and volunteers should feel able to follow the School's Whistleblowing Policy and to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly safeguard the welfare of pupils, or if they are concerned that the School's Safeguarding (Child Protection) and Procedures are not being followed correctly.

11.3 The School has a culture of transparency, and all staff are accountable in relation to how concerns are received and handled.

11.4 Procedures for reporting and handling concerns relating to poor practice and failures in the School's safeguarding regime, are set out in the Whistleblowing Policy.

11.5 The NSPCC whistleblowing helpline is available for those who feel unable to raise any concerns about child protection failures internally. Staff, supply teachers and volunteers may contact the NSPCC Whistleblowing Helpline (0800 0280285) (08:00-20:00 Monday to Friday, 09:00-18:00 at weekends) or email: help@nspcc.org.uk

12. Notification to the Disclosure and Barring Service, the Teaching Regulation Agency and the regulating body

12.1 If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly, if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

This duty applies equally to volunteers in regulated activity, including where a volunteer ceases to volunteer at the School; it is an offence to fail to make a referral without good reason.

12.2 If a member of staff tenders their resignation or ceases to provide their services to the School at a time when child protection concerns exist in relation to that person, those concerns will still be investigated in full by the School and a referral to the Disclosure and Barring Service will be made promptly, if the criteria for a referral are met.

12.3 Separate consideration will also be given to making a referral to the Teaching Regulation Agency where a teacher has been dismissed (or would have been dismissed had they not resigned) because of unacceptable professional conduct, conduct that may bring the profession into disrepute and/or a conviction at any time for a relevant offence.

12.4 EYFS Setting

Where an allegation of harm or abuse is made against anyone living, working or looking after children in the EYFS setting, whether the alleged conduct occurred on the premises or elsewhere, the School will notify ISI (because our single Reception class is not an Ofsted registered setting) of the allegation and of the action taken as soon as is reasonably practicable and in any event within 14 days of the allegation being made. The School will likewise notify that body within 14 days of becoming aware of any significant event likely to affect the suitability of a person in regular contact with children in the setting, including any ground for disqualification.

13. Support for Staff

13.1 Members of staff who have been dealing with child protection issues may find the situation stressful or upsetting. The School understands this and will ensure that they are supported.

13.2 Staff may also be concerned about being sued for defamation if their concerns are later found to be untrue. To assist in protecting against this, staff should ensure that concerns and statements are only made to the appropriate authorities.

14. Keeping children safe through the everyday life of the School

14.1 All staff and volunteers are required to comply with the Staff Behaviour Policy and receive information on Safeguarding and Child Protection procedures at induction.

14.2 Child Missing from School

Parents are responsible for making sure their children come to, and are delivered to, the School safely. If a child is missing from school or from home, it may be an indicator of abuse or neglect. The following procedures should be followed if a child goes missing, with reference made to the Safeguarding Policy if appropriate:

- The attendance register is taken at the start of each morning session and once during each afternoon session, at the same time for all pupils and not to exceed a window of a maximum of thirty minutes, using the national attendance codes, on SIMS. The common registration point for the morning register is 8.35am, with the window closing by 9.00am. The common registration point for the afternoon is 2.00pm, with the window closing by 2.15pm.
- If a pupil is not present, the School Receptionist will attempt to contact the parents of the child, on the first day of absence as a matter of urgency, to find out the reason for the absence. As the pupils get older, some will travel to school unaccompanied. Parents are asked to make sure the School is aware of this and the School will follow up on any non-appearance in the same way
- If absence continues without explanation, further contact is made with parents or emergency contacts to ensure the pupil's safety, and the correct code is entered as soon as the reason is known and within five working days. Where a pupil has a social worker, the social worker is informed of any unexplained absence.
- Form Teachers and Phase Leaders are expected to review the attendance record of the children for whom they are immediately responsible on a regular basis and to follow up extended, regular or patterned absence. A note should also be added to CPOMs and a letter will be sent home by the Deputy Head Pastoral and DSL, if attendance falls below 90% over a half term period or if there is a concern about time missed and the impact on learning
- As well as these formal measures, staff should do informal checks on the class during the day, particularly if they are moving around, leaving the building or going on transport.
- The Attendance data is analysed weekly by the School Administrator and reported to the DSL, so that early indicators of poor attendance or changes at individual, cohort and year-group level are identified and support is targeted. Any part-time timetable

is used only in very exceptional circumstances in the pupil's best interests, never to manage behaviour, has the agreement of parents, forms part of a wider support or reintegration plan with regular review dates and a proposed end date, and is recorded in the register accordingly.

If a member of staff is concerned that a child is missing during the school day:

- They should firstly check with the School Receptionist to see if there is any explanation for the absence and then check whether the child is elsewhere in the School
- If there are still concerns, then a member of the SLT should be contacted immediately and the parents phoned for further checks
- The School ensures that parents have provided at least two emergency contacts for their child
- At this point, if the child is still missing, the police should be contacted (by calling 999) to report a missing child. In most cases there is an explanation, but it is still better to contact the police earlier rather than later

14.3 First Aid and Medical Plans

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for a child to remove clothing for first aid treatment, there will, wherever possible, be another adult present.

All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers immediately via the SmartLog platform. This will be followed up with a phone call by the First Aider, as appropriate.

In accordance with the School's First Aid and Administration of Medications Policies, children requiring regular medication or therapies for long-term medical conditions will be made the subject of a medical plan that has been agreed with the parents.

14.4 Restrictive Interventions, including use of reasonable force and seclusion

The School's primary aim is to avoid the need for restrictive intervention through early support, prevention and de-escalation. Restrictive interventions are used only where necessary and proportionate, for the least amount of time, and with regard to the pupil's welfare.

The School records in writing every significant incident in which a member of staff uses force on a pupil, and every incident of seclusion, restraint or immobilisation by a member of staff, including supply staff and volunteers. Records are made on CPOMS the same day, and parents are informed the same day. This applies even where the intervention is agreed with parents as part of a behaviour support plan.

Any allegation of inappropriate use of force or other restrictive intervention is handled under Section 10 of this Policy and Part four of KCSIE 2026.

The Head and DSL report all such incidents to the Governing Body, which reviews the data at least termly to identify improvements and any disproportionate use in relation to pupils with SEND, pupils who share a protected characteristic, or other vulnerabilities.

Full procedures, including record and report content, the circumstances in which reasonable force may lawfully be used, and staff training, are set out in the School's Restrictive Interventions Policy (including Use of Reasonable Force).

14.5 Safety in and around the School

Entry to the school premises is controlled by doors that are secured physically or by staff supervision.

Authorised visitors to the School will be logged in and out of the premises by the School Receptionist and will be asked to wear a visible School Visitor badge, or Governor badge, in the case of Governors.

Unidentified visitors will be challenged by staff and escorted to the School Office. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near the School or approaching pupils, will be reported to the police.

Internal doors to classrooms will not be locked whilst children are present in these areas.

All rooms that are used for teaching or having discussions with children have clear and unobstructed glass panels in the doors. The School has an open-door policy in all teaching spaces.

Appropriate risk assessments will be undertaken for all off-site School trips and activities.

Toilets and changing facilities at the School are designated for girls; pupils are not permitted to use facilities designated for the opposite biological sex at any venue, and any mixed-sex facility is an individual lockable room opening directly onto a public area. Where an individual pupil requires an alternative facility (for example a self-contained single-occupancy toilet or changing room, or access at a different time), the arrangement is recorded and reviewed regularly.

Professional visitors have their identity checked and the School is assured that they hold the DBS check appropriate to their activity (or that their employer has confirmed this in writing; the School does not ask to see the certificate). Before any visitor delivers content to pupils the School assesses its educational value, its age-appropriateness and whether checks are required, and applies the visiting-speaker protocol at 5.8. Visitors are never left unsupervised with pupils unless the appropriate checks have been completed.

Banned dog breeds (dogs to which section 1 of the Dangerous Dogs Act 1991 applies, including the XL Bully type) are not permitted on the premises at any time, even where the owner holds a certificate of exemption.

15. Online Safety

The School has an Online Safety Policy which empowers it to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk: content, contact, conduct and commerce.

- Content: being exposed to illegal, inappropriate or harmful content, for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- Contact: being subjected to harmful online interaction with other users or with generative AI applications that simulate this, for example peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, including those generated using AI, and online bullying
- Commerce: risks such as online gambling, inappropriate advertising, phishing and financial scams

The School acknowledges that a main area of risk for the school community with regard to online safety can include misinformation, disinformation and conspiracy theories that may influence pupil wellbeing or safety. This is addressed through our comprehensive Wellbeing programme, as well as specific lessons in Computing. Further information on this can be found within the Online Safety and RSHE Policies.

Teachers will use appropriate opportunities within lessons to build resilience, help children to keep safe and teach them how to ask for help if their online safety is threatened. Children will be taught, for example:

- To recognise and manage risks in online situations and to know what to do, how to report it and to whom they should report it
- To recognise when online pressure from others (including people they know) threatens their personal safety and wellbeing, including knowing when and where to get help
- To use assertiveness techniques to resist unhelpful pressure online
- To understand about the safe use of electronic equipment and the internet

- To understand 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.

Photographic images of pupils in school or on school-organised activities, may only be taken with the prior consent of the School and then only in designated areas. The School will not allow images of pupils to be used on school websites, for publicity or press releases, without express permission from the parent. If permission is obtained, the children will not be identified by name. At the start of each academic year, parental consent for the taking and use of photographs and videos will be updated for each pupil.

15.1 Cybercrime

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences, 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 pupil in this area, the DSL will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

15.2 Filtering and Monitoring

To limit children's exposure to online risks from our IT systems, the School has strong and effective filtering (Smoothwall) and monitoring (Senso) systems, following the Government's 'Meeting digital and technology standards in schools and colleges' guidance and in line with the School's ICT and Online Safety policies. The School also follows the Government's 'Plan technology for your school' guidance to self-assess against the filtering and monitoring standards. The School will make sure that:

- Specific staff have assigned roles and responsibilities to manage systems
- Staff know about the systems in place and how to escalate concerns by email to the DSL and DDSLs

- The effectiveness of the filtering and monitoring systems is reviewed at least once every academic year. The review is led by the DSL, the member of SLT responsible for filtering and monitoring, with the support of the IT Team. It includes checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record of these checks is kept. The review ensures that SLT and relevant staff understand the provisions in place, manage them effectively and know how to escalate concerns. The results of this are reviewed with the Governor responsible for filtering and monitoring, Jo Farquharson, who also serves as the Safeguarding Governor.
- There are regular reviews of the systems
- The systems are effective for the age range of children and consider children potentially at greater risk of harm
- When we block online content, it does not impact teaching and learning
- Filtering works across all devices

In the event of an online safety incident:

- The concern should be reported to the Online Safety Co-ordinator, who will inform the DSL and Head, as appropriate. If the incident gives rise to an online safeguarding concern, it should be referred straight to the DSL who will follow the Safeguarding (Child Protection) Policy
- The Online Safety incident will be logged on CPOMs, using the 'Online Safety' tag and all actions will be recorded
- Where necessary, support is actively sought from other agencies (e.g. CEOP, UK Safer Internet Centre helpline) in dealing with online safety issues
- Parents are specifically informed of online safety incidents involving young people for whom they are responsible. Support is offered to parents in how to talk to their daughter about the incident and, if appropriate, how online safety rules and filtering software can be utilised at home
- The Police will be contacted if staff or pupils receive online communication that the School considers particularly disturbing or breaks the law
- Should an incident involve a staff member, this would be passed to the Head who would refer to the staff code of conduct and/or Acceptable Use Agreement
- Pupils are able to report any online safety concerns through the Online Worry box, which can be found through links on Google Classroom and Seesaw
- Monitoring and reporting of online safety incidents via CPOMS take place and contributes to developments in policy and practice in online safety within the School

Types of incidents requiring immediate DSL referral:

- Any incident involving AI-generated sexual imagery
- Online sexual harassment between pupils
- Incidents involving conspiracy theories or extremist content that may indicate radicalisation risks

- Gaming or gambling-related concerns that suggest addiction or financial harm

15.3 Use of Personal Devices

Staff members may use their personal mobile phones during School break times but never in the presence of children and preferably in the Staff Room. All visitors are requested to turn off or keep their phones on silent and ensure they remain out of sight of any children until they leave the premises.

In the EYFS classroom all devices with image taking or sharing capabilities (including mobile phones, smart watches, smart eyewear, etc) must be turned off and stored so that they are not accessible by children. The School will adapt this Policy to include other devices as required, to safeguard pupils. Individual risk assessments will be carried out should a pupil or staff member working in EYFS require such a device in order to access the curriculum or be able to complete their work appropriately.

Mobile phones must not be used in any teaching area in school or within changing areas, the only exception being when staff are using CPOMS to login to the site, with two-factor authentication. Only school equipment should be used to record classroom activities. Photos should be put on the school system as soon as possible and not sent to or kept on personal devices.

During school outings, nominated staff will have access to a school mobile which can be used for emergency or contact purposes. All telephone contact with parents or carers must be made on the school phone, unless in exceptional circumstances with prior permission from the Head such as on residential trips.

Parents are allowed to take photos or videos of their children at School events for their own personal use at the discretion of the Head. If they have other children in them, they must not upload them onto social media sites. The School would encourage parents to consider the digital footprint this creates on a child's behalf, and to review the privacy settings on any account used to share images of children.

Pupils do not have access to mobile phones or smart technology with similar functionality (including smartwatches with messaging or camera functions) throughout the school day, including lessons, the time between lessons, break and lunchtime. Any pupil who needs to bring a phone to school (for example a Year 6 pupil commuting to school unaccompanied) hands it in at Reception on arrival and collects it at the end of the day. Reasonable adjustments are made for pupils with medical conditions or disabilities who need a device. Breaches of this standard are addressed in line with the Positive Behaviour Policy.

15.4 Use of AI

In relation to potentially harmful online content, the school recognizes the emerging concerns regarding misinformation, disinformation (including fake news) and conspiracy theories. Where necessary the Department of Education's 'Generative AI: product safety expectations'

is used by the School to support the use of generative artificial intelligence safely and explains how filtering and monitoring requirements apply to the use of generative AI in education.

The School also has regard to the DfE guidance Generative artificial intelligence in education on the safety considerations and legal responsibilities of using generative AI (whether teacher-facing or pupil-facing), and staff are directed to the DfE's online AI safety modules, including the module on identifying and mitigating safeguarding, ethics and data protection risks. The DSL is aware of the National Crime Agency/CEOP guidance on responding to AI-generated child sexual abuse material and on financially motivated sexual extortion.

16. Record Keeping

16.1 If a pupil is withdrawn from the School, having not reached the normal date of transfer, due to a family move or any other reason, all efforts will be made to identify any new address and the school to which they are being admitted, to ensure that their educational records are sent without delay to that school. If the parent/carer fails to provide this information, an urgent referral will be made by the DSL to the LSCP.

16.2 If the School receives educational records concerning a child who is not registered at the School, the records will be returned to the sending school with a note advising them to contact the LSCP.

16.3 If there is any doubt as to the identity of a pupil, advice will be sought from the LSCP and other statutory agencies, as appropriate.

16.4 The School will maintain accurate records of those with Parental Responsibility for all pupils, along with emergency contact details. The School records each pupil's biological sex accurately wherever it is recorded.

16.5 A pupil's name will only be removed from the Admissions Register in accordance with the Pupil Registration Regulations or with the authorisation of the relevant LSCP.

The School makes a return to the local authority within five days of adding a pupil's name to the admission register (New Pupil Return) and when a pupil's name is deleted from the admission register other than at the end of Year 6 (Deletion Return), providing the information required by the School Attendance (Pupil Registration) (England) Regulations 2024, and makes the attendance and sickness returns required by those Regulations. If a pupil fails to attend on the agreed starting day and cannot be located, the School notifies the local authority. The School supports the local authority in joint reasonable enquiries to identify and support children missing education.

16.6 The content of Child Protection conferences or Review reports prepared by the School, will follow the headings recommended by the LSCP and will, wherever possible, be shared with the parents/carer in advance of meetings.

16.7 Where a pupil leaves the School, the DSL ensures that her child protection file is transferred to the new school as soon as possible and within five school days for an in-year transfer, or within the first five days of the new term for a transfer at the end of the school

year. The file is transferred separately from the main pupil file, securely, with confirmation of receipt obtained. Where information would support the new school's assessment of risk to the pupil or to others (for example a pupil who has had a social worker, who is receiving Channel support, or where there are concerns about serious violence or harmful behaviours) the DSL considers sharing it with the new school in advance of the pupil leaving, and where there are issues or concerns the DSL speaks to the DSL of the receiving school. Where the School receives a child protection file, it is reviewed by the DSL and DDSL so that key risks and needs are understood, clarification is sought where the information is unclear or incomplete, and the DSL decides what information should be shared with other staff and when. Safeguarding information is used to support, not disadvantage, the child.

16.8 Archived records will be kept in accordance with DfE guidelines.

16.9 Data protection laws - the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act of 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent where consent cannot be obtained, cannot be reasonably obtained, or would place a child at risk.

'Safeguarding of children and individuals at risk' is a processing condition that allows special category data to be shared without consent where appropriate. The School is transparent with families about what information it shares and with whom, where it is safe to do so. When deciding what to share, the DSL considers the relevance of the information to the current safeguarding risk, what it is necessary for the recipient to know, and whether it is clearly presented and appropriately contextualised, using professional judgement to keep what is shared focused and proportionate while taking care not to omit information relevant to understanding or managing risk. The School will comply with the statutory Information Sharing Duty introduced by the Children's Wellbeing and Schools Act 2026 and the accompanying statutory guidance when published. Where a subject access request is received, pupils' personal data will not be disclosed where the serious harm test under data protection legislation is met. Staff who are unsure about the lawful basis for sharing seek advice from the DSL or the Head.

17. The Role and Responsibility of the Governing Body

17.1 The Governing Body recognises its responsibility to:

- Discharge its legal responsibilities under the Human Rights Act 1998 and Equality Act 2010, including the need to eliminate unlawful behaviours such as sexual violence and sexual harassment, misogyny/misandry, racism and faith-based prejudice, and to remain aware of the disproportionate vulnerability of some pupils to bullying and harm, having regard for the implications for safeguarding that such responsibilities can have

- Ensure that there are appropriate delegation arrangements at school level including for the Head to enable the School to discharge its safeguarding duties effectively
- Ensure appropriate procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
- Ensure there is a named Designated Safeguarding Lead and Deputy Designated Safeguarding Lead in place
- Ensure that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- Help create an environment where staff feel supported in their safeguarding role and able to raise concerns
- Ensure staff have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.
- Elect a 'board-level lead' for the responsibility of safeguarding, but the safeguarding duties remain the responsibility of the Governing body as a whole
- Have the required knowledge, skills and expertise to take leadership responsibility for the School's safeguarding arrangements. All members of the Governing Body receive appropriate safeguarding and child protection training (including online training)
- Ensure the School contributes to inter-agency working, including providing a co-ordinated offer of Family Help when additional needs of children are identified and support to children subject to child protection plans
- Ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum
- Recognise the expertise of members of staff in safeguarding matters and give them the opportunity to contribute to and shape the safeguarding arrangements and child protection policy

17.2 The Governing Body will conduct an annual review of the School's Child Protection and Safeguarding policies and procedures and of the efficiency with which the related duties have been discharged. The DSL will meet with the Safeguarding Governor on a half termly basis and will work together to prepare a written report commissioned by the full Governing Body. The written report should address how the School ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.

17.3 The Safeguarding Governor will undertake regular termly checks of the SCR.

17.4 The full Governing Body should also consider independent corroboration, such as inspection of records or feedback from external agencies including the Local Authority

Designated Officer. The full Governing Body will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval. Minutes of the review will be sufficiently detailed to demonstrate both breadth and depth of the review.

17.5 The DSL will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary and seeking contributions from staff. The DSL will update the School Leadership Team regularly on the operation of the School's safeguarding arrangements. The DSL will report termly to the Safeguarding Governor on child protection and safeguarding matters, including levels of child protection referrals made by the School. Any deficiencies or weaknesses in regard to arrangements will be remedied without delay.

17.6 The Governing Body will ensure that:

- The School's safeguarding arrangements take into account the procedures and practice of Hammersmith and Fulham Local Safeguarding Children Partnership, including understanding and reflecting local protocols for assessment and the referral threshold document.
- They comply with their duties under legislation and that Policies, procedures and training at the School are effective and always comply with the law.

18. Monitoring and Review

The DSL, DDSLs and Safeguarding Governors conduct an annual audit of all reported safeguarding concerns, including a comprehensive review of the decisions made and actions taken in response to each case. This review will specifically analyse patterns and trends across reported concerns to identify:

- Recurring themes or types of safeguarding issues
- Common circumstances or contexts in which concerns arise
- Effectiveness of responses and interventions
- Gaps or weaknesses in current safeguarding systems and procedures
- Areas where staff or volunteers may require additional training or support

Any patterns identified through this process that may indicate potential weaknesses in our safeguarding systems will inform the development of an action plan to address these areas. This action plan will include clear timescales, designated responsibilities, and measurable outcomes to ensure continuous improvement in our safeguarding practice.

This safeguarding audit is shared with the Governing Body annually to ensure oversight and accountability.

This Policy and its procedures are reviewed annually by the DSL with the Head, and the nominated Safeguarding Governor. It will also be updated whenever needed to ensure it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

Appendices

Appendix 1: Job Description for Designated Safeguarding Lead

In accordance with Annex B of KCSIE, the main responsibilities of the Designated Safeguarding Lead (DSL) are:

Managing Referrals

The DSL has the time, funding, training, resources and support to enable him/her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and to support other staff to do so) and to contribute to the assessment of children.

Availability: the DSL (or a deputy) is available during school hours for staff to discuss any safeguarding concerns, and arrangements are in place (see 2.11) for cover during the DSL's absence and for out-of-hours and out-of-term activities.

The DSL is expected to:

- a) Refer cases of suspected abuse to the local authority Children's Social Care as required
- b) Support staff who make referrals to the local authority Children's Social Care
- c) Refer cases to the Channel programme where there is a radicalisation concern as required
- d) Support staff who make referrals to the Channel programme
- e) Refer cases where a person is dismissed or has left due to risk / harm to a child to the Disclosure and Barring Service as required
- f) Refer cases where a crime may have been committed to the police as required
- g) Be responsible for on-line safety in school, including understanding the filtering and monitoring systems and processes in place
- h) Be aware of the learning from the following review 'Help, protection, education: concluding the Children in Need review June 2019'
- i) Be the designated teacher with responsibility for pupils who are 'looked after children'

Holding and Sharing Information

The DSL will keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program.

Working with Others

The DSL is expected to:

- a) Liaise with the Head to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- b) As required, liaise with the Case Manager and the designated officer(s) at the local authority for child protection concerns (all cases, which concern a staff member)
- c) Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral, by liaising with relevant agencies. Act as a source of support, advice and expertise for staff
- d) Ensure that, in the instance of any police investigations, that the statutory requirement for children to have an appropriate adult (in accordance with PACE Code C), is adhered to

Raising Awareness

The DSL is expected to:

- a) Ensure this Policy is known, understood and used appropriately by all staff
- b) Ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly and work with the Governing Body regarding this
- c) Ensure this Policy is available publicly
- d) Ensure that parents are aware that referrals about suspected abuse or neglect may be made to Children's Social Care and the School's role in this
- e) Maintain links with the Hammersmith & Fulham Local Safeguarding Children Partnership to ensure staff are aware of training opportunities and the local policies on safeguarding

Managing Child Protection Files

When children leave the School, the DSL should ensure their confidential child protection file is sent to their new school or college as soon as possible and within five school days (see 16.7 for advance sharing where there is a risk to others, and the DSL-to-DSL conversation). This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.

Prevent

In accordance with the Prevent duty guidance: England and Wales (2023) and Channel duty guidance: protecting people susceptible to radicalisation (2023) the DSL has, in addition, the following responsibilities:

- a) To act as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty
- b) To coordinate Prevent duty procedures in the School
- c) To liaise with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated

- d) To undergo Prevent awareness training (such as Workshops to Raise Awareness of Prevent (WRAP) or other appropriate training) at least every two years, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels, and to maintain the School's Prevent risk assessment (see 5.8)
- e) To maintain an ongoing training programme for all School employees, including induction training for all new employees and keeping records of staff training
- f) To monitor the keeping, confidentiality and storage of records in relation to the Prevent duty

Training

The DSL and DDSLs have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- a) Understand the assessment process for providing Family Help (including targeted early help) and community-based Early Help and statutory intervention, including the local criteria for action and Children's Social Care referral arrangements, for example through locally agreed common and shared assessment processes such as Early Help assessments
- b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- c) Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff
- d) Are alert to the specific needs of children in need, those with special educational needs and young carers
- e) Are able to keep detailed, accurate, secure written records of concerns and referrals using CPOMs
- f) Understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- g) Obtain access to resources and attend any relevant or refresher training courses
- h) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them
- i) Can take responsibility in the role of senior mental health lead
- j) Have a good understanding of harmful sexual behaviour

- k) Understand the relevant data protection laws and the School's information-sharing arrangements

Appendix 2: Job Description for Deputy Designated Safeguarding Lead

In accordance with Annex B of KCSIE, in the absence of the DSL, the main responsibilities of the Deputy Designated Safeguarding Lead (DDSL) are:

Managing Referrals

In the absence of the DSL, the DDSL is expected to:

- a) Refer cases of suspected abuse to the local authority Children's Social Care as required
- b) Support staff who make referrals to the local authority Children's Social Care
- c) Refer cases to the Channel programme where there is a radicalisation concern as required
- d) Support staff who make referrals to the Channel programme
- e) Refer cases where a person is dismissed or has left due to risk / harm to a child to the Disclosure and Barring Service as required
- f) Refer cases where a crime may have been committed to the police as required
- g) Be responsible for online safety in School

Working with Others

The DDSL is expected to:

- a) Liaise with the DSL and Head to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- b) As required, liaise with the Case Manager and the designated officer(s) at the local authority for child protection concerns (all cases, which concern a staff member)
- c) Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral, by liaising with relevant agencies
- d) Act as a source of support, advice and expertise to the DSL and all staff

Raising Awareness

The DDSL should work with the DSL to:

- a) Ensure this Policy is known, understood and used appropriately by all staff
- b) Ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly and work with the Governing Body regarding this

- c) Ensure this Policy is available publicly
- d) Ensure that parents are aware that referrals about suspected abuse or neglect may be made to Children's Social Care and the School's role in this
- e) Maintain links with the Hammersmith & Fulham Local Safeguarding Children Partnership to ensure staff are aware of training opportunities and the local policies on safeguarding

Managing Child Protection Files

In the absence of the DSL, the DDSL should, when children leave the School, ensure their confidential child protection file is sent to their new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.

Prevent

In accordance with the Prevent duty guidance: England and Wales (2023) and Channel duty guidance: protecting people susceptible to radicalisation (2023) the DDSL should in addition, assist the DSL with the following responsibilities to:

- a) Act as the second point of contact for parents, pupils, teaching and non-teaching staff and internal agencies in all matters relating to the Prevent duty
- b) Help to co-ordinate Prevent duty procedures in the School
- c) Help to liaise with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated
- d) To undergo Workshops to Raise Awareness of Prevent (WRAP) or other appropriate training
- e) Help to maintain an ongoing training programme for all School employees, including induction training for all new employees and keeping records of staff training
- f) Help to monitor the keeping, confidentiality and storage of records in relation to the Prevent duty

Training

The DDSL has undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- a) Understand the assessment process for providing Family Help (including targeted early help) and community-based Early Help and statutory intervention, including the local criteria for action and Children's Social Care referral arrangements, for example through locally agreed common and shared assessment processes such as Early Help assessments

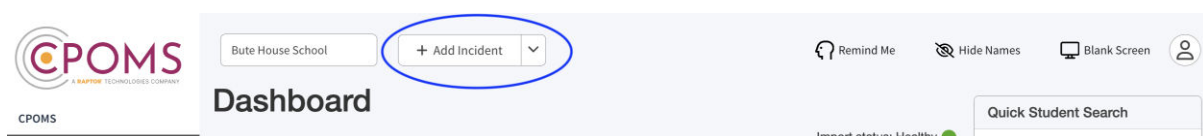
- b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- c) Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff
- d) Are alert to the specific needs of children in need, those with special educational needs and young carers
- e) Are able to keep detailed, accurate, secure written records of concerns and referrals; using CPOMs
- f) Understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- g) Obtain access to resources and attend any relevant or refresher training courses
- h) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them

Appendix 3: Recording of Safeguarding and Welfare Concerns

The School uses the online software CPOMS for recording all safeguarding, welfare and pastoral issues. It is a secure system that allows the School to build a rounded picture of each pupil and track any trends or issues with concerns throughout their time at the School. All staff are given a secure login and trained how to record any concerns as part of their induction process. The DSL and DDSLs are always available to assist staff with recording concerns when necessary.

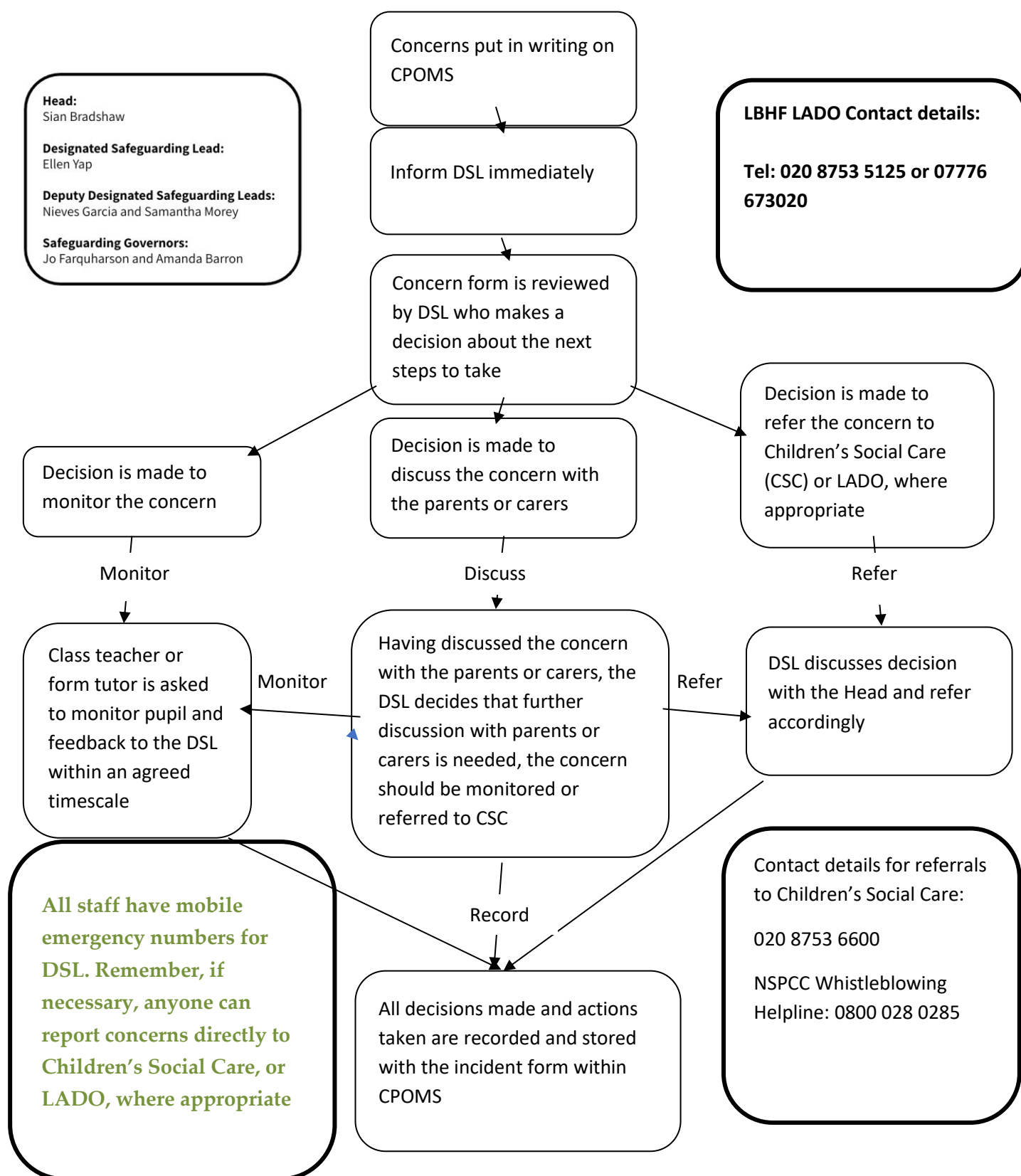
To report an observation, incident or safeguarding concern, staff need to login to CPOMS, and click on the 'Add Incident' tab at the top of the dashboard. Selecting the correct category ensures that the appropriate people are notified, and access to the record is restricted appropriately.

Records are clear and factual, distinguish between observed concerns, professional opinion and historic information, and record decisions and their rationale, including where a referral was considered but not made.



Appendix 4: Safeguarding Action Flowchart

Raising safeguarding concerns about a child



Appendix 5: Visiting Speakers Form



Bute House Visiting Speakers Approval Form

For all visitors for all pupils Reception-Year 6

This form must be completed and approved before a visiting speaker engagement is confirmed.

It applies to one-off visits only.

This must be returned to the host member of staff no later than 10 working days before the proposed visit, together with all presentation materials, as available. Visits will not be approved where materials have not been received and reviewed in advance.

Part 1 – To be completed by the visiting speaker	
Full name (as shown on photo ID)	
Any previous or other names used	
Organisation / employer	
Job title or role	
Organisation website	
Email address	
Telephone number	
Postal address (if self-employed)	
Part 2 – To be agreed by the host member of staff	
Proposed date of visit	
Arrival time / departure time	
Location within School	
Year groups – Reception to Year 6	

Approximate number of pupils	
Format (assembly, lesson, workshop)	
Bute House host member of staff	
Have you visited any other school on any other day in the last 30 days, or will you do so in the next 30 days? (Yes / No – if Yes, give dates)	
Part 3 – Session Content	
Session Title	
Please tick any of the following the session touches upon: ☐ Relationships, Sex and Health Education (RSHE) content ☐ Mental health, emotional wellbeing or self-esteem ☐ Bereavement, loss or serious illness ☐ Online safety or online harms ☐ Body image, food or physical activity ☐ Faith, belief or religion ☐ Political, social or otherwise contested issues ☐ Personal safety, abuse or exploitation ☐ Other (please specify below) ☐ None of the above If other, please specify _____	
Materials enclosed with this form <i>Please provide all materials that will be used with pupils, as applicable</i> ☐ Presentation slides ☐ Video or audio (with links or files) ☐ Handouts or worksheets (including those left behind after visit) ☐ Session plan, script or running order ☐ Any items or objects given to pupils or left behind after visit ☐ Other (please specify)	
I confirm that no commercial, licensing or contractual term prevents Bute House Preparatory School from sharing these materials in full with parents on request. ☐	

Part 4 – Suitability (please tick appropriate option)
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☐	Route 1: Written assurance from your employing organisation	Attach written confirmation from my employer that the appropriate vetting checks, including an enhanced DBS check, have been completed.
☐	Route 2: Enhanced DBS certificate in my own name	DBS certificate number:
		Date of issue:
		Issuing organisation:
		DBS update service number (if subscribed):
		Do you consent to the School carrying out an online status check
☐	Route 3: No check held	I hold no current DBS certificate. I understand and accept that I will be supervised at all times by a member of School staff and will not be left alone any point.

All speakers must complete the following declarations:

- ☐ I am not barred from working with children.
- ☐ I am not subject to a prohibition order, an interim prohibition order, or any equivalent sanction or restriction.
- ☐ I am not disqualified from working with children under any relevant legislation.
- ☐ There is nothing in my history or present circumstances that might reasonably affect my suitability to work with children.
- ☐ I will produce photographic identification at Reception on arrival.

Content

- ☐ The content is factually accurate and age-appropriate for the year group(s) named.
- ☐ The content does not promote partisan political views (Education Act 1996, s.406).
- ☐ Where political or contested issues arise, I will offer a balanced presentation of opposing views (Education Act 1996, s.407).
- ☐ The content is consistent with, and does not undermine, the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.
- ☐ I have no affiliation with any proscribed or extremist organisation, and the content includes no extremist material.
- ☐ The content does not discriminate against, denigrate or stereotype any person or group on the basis of a protected characteristic under the Equality Act 2010.
- ☐ I will not campaign, proselytise, fundraise, recruit, or promote any product or service during the visit.

Conduct

- ☐ If a pupil discloses information to me that raises a safeguarding concern, I will pass it immediately to the Designated Safeguarding Lead and will not promise confidentiality.
- ☐ I will not photograph, film or record pupils, and will not post about the visit or its pupils on social media.
- ☐ I will follow the School's signing-in, visitor badge, fire and emergency procedures.

Signed (visiting speaker): _____ Dated: _____

Signed (Bute point of contact): _____ Dated: _____

Once signed by the Bute point of contact, please return this form, and any materials the speaker intends to use, via email to the Senior Deputy Head (rvaughan@butehouse.co.uk).