TRANBY

EAST YORKSHIRE

CHILD PROTECTION (Safeguarding)

This policy applies to all members of our school community including those in our Early Years setting.

The School is fully committed to ensuring that the application of this policy is non-discriminatory in line with the UK Equality Act (2010). Further details are available in the School's Equal Opportunity Policy document.

Tranby seeks to implement this policy through adherence to the procedures set out in the rest of this document.

This document is available to all interested parties, including parents/carers and prospective parents/carers, on our website and on request from the main school office and should be read in conjunction with the following policies and advice:

- Annual Safeguarding / Child protection report to LGB Members
- Keeping Children Safe in Education Statutory Guidance Sept 2026
- Inspecting Safeguarding in Early years, Education and Skills Settings Ofsted Sep 2023
- Anti-Bullying
- Cyberbullying
- Behaviour
- Missing Pupil
- Uncollected Child
- Mobile Phones
- Foundation Stage Acceptable use of Cameras and Mobile Phones
- Acceptable Use of ICT (Staff)
- Whistleblowing
- Staff Code of Conduct
- Letter from Chief Executive and Headmaster to All Staff
- What to do if you are worried a child is being abused (March 2015) – Advice for practitioners

This document is reviewed annually by Mrs A Robinson or as events or legislation change requires. The next scheduled date for review is September 2027.

Review Timetable / Document Log

Child Protection (Safeguarding)	
The Policy will be reviewed annually, as set out below:	
Policy reviewed centrally	July 2026
Policy tailored by individual schools	September 2026
Policy ratified by Local Governing Bodies	September 2026
Policy approved by the Group Board	July 2026
Implementation of Group Policy	September 2026

Date of last central office review:	July2026	Review Period:	1 year (minimum)
Date of next central office review:	July 2027	Owner:	Mrs Annabel Robinson Assistant Head DSL
Date of next school level review:	September 2027		
Type of policy:	United Learning Policy	Local Governing Body	Approves completed school policy
		Group Board:	Group Board approves United Learning Policy

KEY EXTERNAL CONTACT DETAILS

East Riding School Safeguarding Adviser & Local Authority Designated Officer (LADO) (Schools)	Lisa Dosser (Local Authority Designated Officer) Jayne Hammill (Local Authority Designated Officer) EMAIL: LADO@eastriding.gov.uk ADDRESS: Room AF 56, County Hall Beverley. Referral of allegations against staff and volunteers. General strategic and operational School Safeguarding and Child Protection advice.
Safeguarding & Partnership Hub CP initial referral Support & Advice: Intensive & Specialist Safeguarding support 1. Urgent C P concerns 2. Consultation with Social Worker Out of Hours	Mon to Thu 8:30am – 5:00pm Fri 8:30am – 4:30pm 01482-395500 Request for service forms to: safeguardingchildrenshub@eastriding.gov.uk
Early Help Locality Hub Early Help Additional Support for children & families initial consultation	Consultation: 01482 391700 Request for Service form to the Hub nearest to where the child lives

	ehp.bridlington@eastriding.gov.uk ehp.beverley@eastriding.gov.uk ehp.goole@eastriding.gov.uk ehp.haltemprice@eastriding.gov.uk ehp.hedon@eastriding.gov.uk ehp.wolds@eastriding.gov.uk
Haltemprice Children's Safeguarding Team	TEL: 01482 565560 Anlaby Children's Centre
East Riding Safeguarding Children Board	TEL: 01482 396999 EMAIL: erscb.enquires@eastriding.gov.uk General strategic and operational Safeguarding and Child Protection advice. http://www.erscb.org.uk/
NSPCC whistleblowing advice line	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk Barring Service **ADDRESS:** DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom **TEL:** 03000 200 190
Teaching Regulation Agency	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 12344155 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk
School critical incident, bomb threats etc. & Educational Visits Emergencies (not Child Protection)	TEL: 01482 392999 24 hour guidance and support
ER Safeguarding Children Partnership General strategic and operational Safeguarding & CP advice and multiagency training	www.erscp.org.uk 01482-396994 erscp.training@eastriding.gov.uk
East Riding Safeguarding Children Board (Training)	www.erscp.org.uk TEL: 01482 396994 EMAIL: erscb.training@eastriding.gov.uk
Hull Children's Social Care	Tel: 01482 448879 Emergency Duty Team TEL: 01482 788080

North Yorkshire North Lincs North East Lincs	TEL: 0845 034941 Emergency Duty Team TEL: 01482 300 304 TEL: 01724 296500 TEL: 01472 325555
Prevent Referral Humberside Police ERY LA	101 prevent@humberside.pnn.police.uk prevent@eastriding.gov.uk

KEY SCHOOL CONTACT DETAILS

United Learning Trust (UCST)	Chair of UCST Dr Rosalind Given-Wilson EMAIL: company.secretary@unitedlearning.org.uk Director of Trust Safeguarding Ben Antell EMAIL : Ben.Antell@unitedlearning.org.uk **Regional Director (United Learning)** Fiona Boulton EMAIL: Fiona.boulton@unitedlearning.org.uk Head of Safeguarding (United Learning) Frazer Smith TEL: M: 07826 934336 EMAIL: frazer.smith@unitedlearning.org.uk **United Learning Safeguarding Officer** Sara Bryson EMAIL: Sara.bryson@unitedlearning.org.uk
Local Governing Body (LGB)	Chair of LGB Paul Grimwood TEL: 01482 657016 EMAIL: paul.grimwood@tranby.org.uk Nominated Safeguarding and E-Safety LGB Member of LGB Mr Chris Huscroft TEL: 01482 657016 EMAIL: chris.huscroft@tranby.org.uk
Designated Safeguarding Lead and E-Safety Lead (DSL), and Designated Safeguarding Lead Safeguarding Lead (Prep) and Deputy Designated Safeguarding Lead (DDSL) E-Safety Lead	Main DSL for the School (and E-Safety Lead) Annabel Robinson TEL: 01482 657016 EMAIL: annabel.robinson@tranby.org.uk

	DDSL for the School Fraser Henderson TEL: 01482 657016 EMAIL : fraser.henderson@tranby.org.uk **Safeguarding Lead – Prep School (DDSL)** Sarah Maynard TEL: 01482 657016 EMAIL: sarah.maynard@tranby.org.uk
Designated Teachers for Looked After Children	Annabel Robinson TEL: 01482 657016 EMAIL: annabel.robinson@tranby.org.uk
Headmaster	Mr Chris Wainman TEL: 01482 657016 EMAIL: chris.wainman@tranby.org.uk

Policy Statement

This policy applies to Tranby School ("the school"), which includes the EYFS setting. United Learning Trust requires the School's Local Governing Body to review and update this policy annually (as a minimum). This policy is available on the school website http://www.tranby.org.uk/about-us/policies-procedures This policy is ratified annually by the United Learning Group Board.

This policy has regard to the following guidance and advice as amended from time to time (and any supplemental guidance/advice referred to therein)::

- Keeping Children Safe in Education (DfE, current edition/publication)
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, 2015)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (Updated 2024)
- Mental Health and Behaviour in Schools (DfE, November 2018)
- Preventing and Tackling Bullying (DfE, July 2017)
- Working Together to Safeguard Children (DfE, Current edition/publication)
- Information Sharing Duty (DfE, 2026) - s16LA of the Children Act 2004
- Revised Prevent Duty Guidance: for England and Wales (Home Office, April 2023)
- The Prevent duty: safeguarding learners vulnerable to radicalisation (DfE, updated September 2023)
- Relationships education, relationships and sex education (RSE) and health education (DfE, 2025)
- Statutory Framework for the Early Years Foundation Stage (DfE, 2025)
- Equality Act (2010)
- The Human Rights Act (1998)
- The Independent School Standards (DfE, 2026)
- Data (Use and Access) Act 2025 (effective from January 2026)
- Crime and Policing Act 2026

This policy also considers the procedures and practice of the East Riding Local Authority and the published safeguarding arrangements set out by the three local safeguarding partners https://www.erscp.co.uk/. The Local Governing body, and their senior leadership teams, especially their designated safeguarding leads, will:

- make themselves aware of and follow their local arrangements (including the local criteria for action and the local protocol for assessment)
- ensure this is reflected in their own policies and procedures
- supply information as requested by the three safeguarding partners
- work with social care, the police, health services and other services to promote the welfare of children and protect them from harm

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who encounters children, and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, always, what is in the **best interests** of the child. If children and families are to receive the right help at the right time, **everyone** who encounters them has a role to play in identifying concerns, sharing information and taking prompt action.

The school will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of '**it could happen here**' and no reports in their school it does not mean it is not happening. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, the school will ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

CONCERNS ABOUT A CHILD

The school has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children **is everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The school has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements are set out below.

Staff should expect to support social workers and other agencies following any referral.

Definitions of Safeguarding, abuse, neglect and exploitation

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

Abuse is a form of maltreatment of a child. Somebody may abuse, exploit or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet).

Technology is a significant component in many safeguarding and well-being issues. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life. They may be abused by an adult or adults or by another child or children. Abuse can be:

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

All staff should be aware of indicators of abuse and neglect. Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse. Staff should always be vigilant and raise any concerns with the DSL or DDSL.

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

- 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
- consensual and non-consensual sharing of self-generated intimate images including those generated using AI e.g. deepfakes and/or videos

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experience as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL or DDSL if they have concerns about a child.

If staff suspect or hear an allegation or concern of abuse or neglect from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to.
- a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded on CPOMS. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where a report includes online elements, staff are reminded not to view or forward any illegal images of a child but note what has been reported. Further guidance can be found here: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

All records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and possible outcomes.

Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The school manages this by recognising that listening to children/ young people is an important and essential part of safeguarding them against abuse and neglect. We will seek to develop resilience in the children and ensure that they are aware that they can seek help and support.

Children will be made aware of the opportunities available to them to seek advice and support within the formal and informal curriculum.

Safe school procedures including Child Protection matters will be discussed by the School Council and through school surveys etc. to gather children's opinions about the support systems in place.

Information Sharing:
Safeguarding information will often be special category personal data and the school will comply with data protection law and have due regard to the Department for Education's statutory guidance - Information Sharing Duty (DfE, 2026) - s16LA of the Children Act 2004 and the relevant provisions of KCSIE when sharing such data. Personal information may be shared by the school with a third party (such as the police or local authority) without consent if there is a lawful basis to do so such as where doing so is in order to promote a child's welfare or where their safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent in certain circumstances. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The school operates its processes with the best interests of the student at its heart.

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The school will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the school will ensure that members of staff:

- are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data'.
- understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances.
- Do not provide pupils' personal data where the sharing does not comply with data protection law.

When sharing information staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies:

Data Sharing Policy
Requests for personal data from a third party
Procedure for disclosing information safely
Procedure for the secure transfer of files

When sharing information staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies. These policies are available to staff via the United Learning Policies Portal.. For further information about how the school processes pupil personal data, please see the privacy notice on the website: https://www.tranby.org.uk/privacy

What staff should do if they have concerns about a child

If staff (including LGB Members, agency staff and volunteers) have any concerns about a child's welfare they should act immediately and should speak with the School's DSL or DDSL in line with Working Together to Safeguard Children. If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL and DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the school's local safeguarding partners. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services and/or
- making a referral to the police.

If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume a colleague or another professional will act and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a Child in Need or Child Protection plan). Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing (in line with this policy).

Support before statutory intervention

Any child may benefit from support before statutory intervention including from universal services and community-based Early Help, or the targeted early help level of Family Help. All staff should be particularly alert to the potential need for early help for a child who:

• is disabled or has certain health conditions and has specific additional needs
• has special educational needs (whether or not they have a statutory Education, Health and Care plan)
• has a mental health need
• is a young carer
• is pregnant and or is a parent themselves
• has exhibited early signs of abusive, violent and/or harmful behaviours

• 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 education, home or care
• has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
• is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
• is at risk of being radicalised into terrorism
• has a parent or carer in custody, 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 themselves
• is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
• is a privately fostered child.

Children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

The following behaviours and indicators can be signs that children are at risk:

• 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
• consensual and non-consensual sharing of self-generated intimate images including those generated using AI e.g. deepfakes and/or videos.

What staff should do if a child is suffering, or is likely to suffer from harm

If staff (including LGB Members, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to East Riding of Yorkshire children's social care (and the police if appropriate) is made in accordance with the East Riding of Yorkshire referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible as part of the referral process, to enable a contextual approach (see Contextual Safeguarding).

After a telephone contact to the SaPH the DSL will email written 'Confirmation of Referral' as soon as possible – ideally immediately after initial telephone referral and at the latest within 24 hours. This information will be made available to the CST manager at SaPH. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.

If the child is already 'Open' to CSC an initial contact will be made with the Social Worker or if unavailable the 'Duty' team member at CST

In the case of a child open to a 0-25 team Social Worker the school will contact her/ him. If open to another 0-25 worker, the S&PH will be contacted

The school's local safeguarding partners are East Riding Safeguarding Children Partnership and the locally agreed safeguarding arrangements can be found at http://www.erscp.org.uk/

All staff are made aware and regularly reminded:

- That they are in a Position of Trust and what the implications of that are.
- All staff should ensure that they do not behave in a way that will result in founded or unfounded allegations of inappropriate, abusive or dangerous behaviour
- Of the requirements of the school Code of Conduct and related policies.
- If at any time staff are concerned that an action or comment made may be misinterpreted or that a child behaves or makes a comment in a way that causes concern in this respect, they should log their concerns immediately with the appropriate senior member of staff and seek advice.
- That failure to adhere to the Code of Conduct including carrying out their safeguarding responsibilities may result in disciplinary action against them and in some cases allegations of inappropriate or abusive behaviour and Child Protection investigation.
- That their conduct towards pupils must remain beyond reasonable reproach.
- All staff and volunteers are to be provided with induction training within seven working days of their commencement of work that includes:

  a) The school's child protection, anti-bullying and behaviour policies
  b) The staff code of conduct
  c) The identity of the appropriate DSLs (designated safeguarding leads)
  d) Part 1 (and Annex B) of Keeping Children Safe in Education (September 2025) – each update to KCSiE 2025 to be read and understood by all staff.
  e) Whistleblowing procedures

- All staff working with KS4&5 pupils are made fully aware of the law relating to 'Abuse of Trust'
- Assurance is obtained [i.e., in written form and 'logged'] that appropriate child protection checks, and procedures apply to any staff employed by another organisation and working with the school's pupils on another site (for example, in a separate institution).

That any sexual 'relationship' consensual or otherwise with pupils up to 18 would constitute a criminal offence. Any such behaviour with pupils 18 or over would be regarded as a serious disciplinary matter.

Where extended school activities are provided and managed by the school, our own Child Protection and Safeguarding policy and procedures will apply.

When pupils attend off – site activities and provision including day, residential, work-related learning placements and other alternative provision we will ensure that we obtain the same written assurances.

We will ensure that attendance at alternative or off-site provision for pupils that remain on the school role is monitored in the same way as other pupils.

If vulnerable pupils or pupils that may present a level of risk to them or others are allocated alternative or other off-site provision the school will discuss these issues with the provider to ensure that appropriate safeguarding measures and liaison between settings is effective.

In the same way the DSL will discuss such concerns with Educational Visits Coordinators and visit leaders at the visit planning stage.

The school will follow the appropriate LA and United Learning planning and Risk assessment procedures for all educational visits and activities.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above.
If after consideration it is felt that there are concerns about possible radicalisation to encourage violent extremism, including online, or concerns about the behaviour of parents, guardians or other family members a referral will be made to the Police & LA Prevent sections.

If there is an immediate concern of risk or emergency the school will call 999.

In cases of possible hate crime, a separate referral will be made to the Humberside Police Hate Crime reporting system via 101 or online at the ERYC Web site. This will not prevent or delay the school in following our own internal disciplinary procedures in such cases.

Advice and support can also be sought from children's social care.

The school, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL, DDSL and the LGB Member responsible for safeguarding, to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised. See further below for more information on radicalisation. Further guidance can be found in the Revised Prevent duty guidance: for England and Wales April 2021.

What staff should do if they discover an act of Female Genital Mutilation ('FGM')

All staff should speak to the DSL or DDSL about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

What staff should do if a child goes Missing from Education/Children Absent from Education

Children missing/absent from education, particularly repeatedly and/or for prolonged periods, and children missing education (unexplainable and/or persistent absences from 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 their school's or college's unauthorised absence procedures and children missing education procedures. The school's procedures for unauthorised absence and for dealing with children who go missing from education are:

- The school will only remove children from the register if the statutory grounds for doing so are met and will inform the LA of the intention to do so. In the case of CME school will make all reasonable efforts to locate the child/ren as required by the guidance.
- The school will inform the LA EWS if any pupil fails to attend without permission for a continuous period of 10 days or more and will refer children whose attendance has fallen below the agreed level to the EWS.
- If a child, who is the subject of a Child Protection Plan or is otherwise open to the CST, does not attend school without a verified valid reason the DSL will contact the assigned social worker or CST duty desk if unavailable.
- If a child does not open to CSC that the school has concerns about, does not attend school the school will contact, EHLH, the EWS and / or the Police depending on the circumstances.
- If a child absconds from the site, the school will make an initial search and contact the parent/guardian or other emergency contact. (And Social Worker if open to CSC). If after that search the child is not located the school will contact the Police within 20 minutes of the alert or sooner in extreme circumstances. Further detail can also be found at Appendix 1 of this policy.

The school will report to East Riding Education Welfare Service a student who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

Elective Home Education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, it is recommended in statutory guidance that schools and other key professionals work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

Risk Assessments and Safety Plans

Assessing and managing safeguarding risks to/for children involves identifying vulnerabilities and risks, evaluating the likelihood and impact of harm, and putting proportionate measures in place via a written risk assessment or safety plan. Schools should ensure that a written risk assessment and/or safety plan is put in place promptly where there is a risk of significant harm, or where

needs escalate beyond what can be safely managed without such a coordinated approach. Such situations may be identified by staff through (not exhaustive):

- Clear disclosures or evidence of harm;
- Escalating patterns of concern (e.g. behaviour, attendance, emotional wellbeing);
- Complex or cumulative vulnerabilities;
- Periods of transition or reintegration following crisis;
- Multi-agency involvement requiring coordinated risk management.

Examples of when such an approach may be needed include (not exhaustive):

- A pupil moving from low mood to expressing hopelessness, and then to suicidal thoughts/ideation;
- An incident/pattern of self-harm (assessing both the severity and frequency);
- Behaviour escalating from verbal conflict to intimidation or threats, and serious risk of physical violence to others;
- An incident/pattern of sexual harassment and/or sexual violence towards children and/or staff;
- A pupil becoming increasingly isolated or targeted, raising concerns about exploitation, bullying, or child-on-child abuse;
- Return to school following a significant incident or external intervention (e.g. hospitalisation, police involvement, social care intervention) where risks remain.

When the school identifies such a potential risk of significant harm, they will:

- Contact the United Learning Safeguarding Team for advice and support;
- Work with the family to create a written risk assessment management plan/safety plan;
- Ensure the plan is clear, proportionate and specific, identifying:
    - the nature of the risk,
    - known triggers or warning signs,
    - protective factors,
    - agreed strategies to reduce risk,
    - roles and responsibilities of staff,
    - actions to take if risk escalates;

- Use a local/reliable sourced template document (schools are encouraged to use local resources, if possible, if they do not have access to an appropriate document there are template documents available via the United Learning Safeguarding Team);
- Seek the views of relevant agencies (with parental/carer permission), where appropriate;
- Ensure the child's voice is central to the plan, where appropriate;
- Share the plan with relevant staff on a need-to-know basis to ensure consistent implementation;
- Review the plan regularly, with frequency determined by the level of risk, and update it dynamically as circumstances change.

Oversight of high-risk plans should sit with the DSL/DDSL/SMHL, with senior leaders assured that plans are understood, implemented consistently and effective in reducing risk.

What staff should do if they have concerns about another staff member (including supply staff, volunteers and contractors)

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Headmaster. Where there are concerns/allegations about the Headmaster, this should be referred to the Chair of the LGB and Head of Safeguarding. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, volunteers and contractors).

What staff should do it they have concerns about safeguarding practices in the school

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the school's whistleblowing procedures below:

1. All staff have access to:

    a. The School Whistle Blowing policy.
    c. Contact details of the Chair of LGB and LADO.

2. All staff are made aware of their responsibilities and procedure to follow in the strictest confidence.

3. However, it must be appreciated that in the case of a Whistle Blowing situation, an investigation process may reveal the source of the information and a statement by the referrer may be required.

4. All staff are made aware that if they receive an allegation of inappropriate or abusive behaviour about a colleague, or feel required to make such an allegation, they should pass the information, without delay, to the Headmaster. If in this situation the member of staff

feels unable to discuss the issue with the Headmaster s/he should contact, another senior member of staff or the LADO.

5. Any allegations of abusive or inappropriate behaviour against a member of staff should be passed immediately to the Headmaster. If the allegation is against the Headmaster, it must be reported directly (on the same day) the chair of the LGB (Paul Grimwood - contact details on page 7), and the LADO (Jayne Hammill and Siobhan Bath) by the person receiving the allegation and follow the statutory guidance contained in KCSiE (September 2025) and ERLA detailed procedures. It is unacceptable for any member of staff not to refer such concerns. This contact should be made without the Headmaster being informed.

6. The Headmaster will report to the DBS within one month of leaving any person whose services are no longer used because he or she is considered unsuitable to work with children. Failure to make such a report to the DBS constitutes an offence and the school may be removed from the DfE register of independent schools. It should be noted that "compromise agreements" cannot apply in this connection.

7. The Headmaster (or other in 5) will, on the same day, contact the LADO and follow the statutory guidance Keeping Children Safe in Education 2025.

8. All involved will attempt to ensure that any allegation is dealt with fairly, quickly, proportionately and consistently in a way that provides effective protection for the child and at the same time supports the person who is subject to the allegation.

9. If the member of staff feels that the actions taken are inappropriate, ineffective or that the situation of concern is continuing they should raise concerns with the Headmaster (or other in 5) and press for reconsideration or discussion. If the concern persists and they feel the situation is urgent they can refer to Children's Social Care or the LADO.

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and explained the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer. The Case Manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

10. Allegations of abuse against another pupil must be reported to the DSL (who will inform the Headmaster and the LADO immediately)

a. When there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm from another pupil, the school should report its concerns to Local Authority social care department.
b. Restorative Practice is used to minimise the risk of peer-to-peer abuse and allegations are investigated fully and fairly.
c. Peer to peer abuse will not be tolerated or passed off as 'banter.

d. Appropriate counselling and support will be given to victims, including advice about what to do if the bullying/abuse continues.
e. please refer to the School's Anti-bullying Policy.

11. In cases of serious harm or where a crime may have been committed the Police will be informed from the outset

12. Any such matters will be dealt with in the strictest confidence

13. The school will not undertake their own investigations of allegations without prior consultation with the LADO

14. If an allegation of abuse is made against anyone working with children in a school, all unnecessary delays will be eradicated

15. Historical allegations of abuse will be referred to the police.

Where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate, the school will make a referral to the Teaching Regulation Agency (TRA). The Teaching Regulation Agency started operation on 1 April 2018. NCTL was an executive agency, sponsored by the Department for Education. It existed from 29 March 2013 to 31 March 2018.

Regulation of the teaching profession, including misconduct hearings, will continue to be handled by an executive agency of the Department for Education.

All other NCTL functions have been moved into the Department for Education.

Contact the Teaching Regulation Agency if you need information about regulation of the teaching profession.

Contact the Department for Education if you need to contact NCTL.

The reasons such an order would be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or 'a conviction, at any time, for a relevant offence. Note: Where a dismissal does not reach the threshold for DBS referral, separate consideration by the school will be given to a TRA referral.

There is a requirement to report to the Disclosure and Barring Service (DBS), within one month of leaving the school any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children [although this area is under review by the current Government].

Failure to make such a report to the DBS constitutes an offence and the school may be removed from the DfE register of independent schools ('compromise agreements' cannot apply in this connection).

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

If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being

handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

CHILD-ON-CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARRASSMENT)

Safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here". Staff should recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported.

This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- abuse in intimate personal relationships between children (also known as teenage relationship abuse),
- physical abuse which can include 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. Part five of this guidance sets out how schools and colleges should respond to reports of this nature,
- consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI Searching Screening and Confiscation Advice for schools.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- upskirting (which is a criminal offence44), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals.
- clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

Child-on-child abuse can be associated with factors outside the school and can occur online and face-to-face between two or more children of any age or gender. The school therefore takes a contextual safeguarding approach to managing child-on-child abuse.

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. The school takes a zero-tolerance approach to abuse, and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys

being boys" as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children.

It is recognised 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 that all child-on-child abuse is unacceptable and will be taken seriously.

As such, if staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

Child-on-child abuse can be associated with factors outside the school and can occur online and offline and between children of any age or gender. The school therefore takes a contextual safeguarding approach to managing child-on-child abuse.

Child-on-child abuse is abuse and is never acceptable. It should never be passed off or dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys".

The school takes the following steps to minimise the risk of child-on-child abuse

- issuing and implementing a pupil Code of Conduct that emphasises the importance of unconditional mutual respect and consideration for all members of the school community
- recognising kind and considerate behaviour
- challenging intimidating, unkind and inconsiderate behaviour wherever we encounter it, however minor it may appear
- strongly discouraging and challenging overtly sexualised behaviour or language; prohibiting pornography in any form
- adopting a zero-tolerance approach to bullying
- limiting opportunities for cyber-bullying/abuse by controlling the use of electronic devices in school
- using Assemblies, House events and PSHE/RSE to celebrate and underline the importance of individuality, diversity and the unconditional value of all humans
- being alert to any behaviour or the development of circumstances which may suggest that bullying / abuse could be more likely to happen (such as: the formation of gangs or assertive cliques; certain pupils appearing to be uncomfortable in the presence of other pupils; overtly sexualised behaviour / use of sexual language) and reporting any concerns to a senior member of staff
- publicising to pupils where to go if they are scared, intimidated or concerned about others' behaviour.

All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether consensual or non-consensual, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability. The school's approach to pupil's sharing self-generated intimate images and/or videos including those generated using AI e.g. deepfakes (also known as nudes and semi-nudes) images and or videos, is that it should be treated as a safeguarding concern. The DSL will then:

- hold an initial review meeting with appropriate school staff
- interview the young people involved (if appropriate)

- inform parents at an early stage and involve them in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately.

Staff are also referred to United Learning E-Safety Policy (available on United Learning Hub).

Further guidance can be found in the UKCIS sharing nudes and semi-nudes: advice for education settings guidance.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

'Up-skirting' behaviour is now a criminal offence and must be reported as such to senior staff as a form of sexual harassment.

What to do if staff suspect that a child may be at risk or hears a report of child-on-child abuse

The procedures set out below have been developed following consultation with students, staff and parents, and will be reviewed, at least annually, considering an assessment of the impact and effectiveness of the policy.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward that they will be supported and kept safe. Abuse that occurs online should not be downplayed and should be treated seriously. All staff should be able to reassure victims that they are being taken seriously, and they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is 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 a way that avoids alarming or distressing them.

In the event of disclosures about child-on-child abuse, all children involved will be treated as being at risk and the safeguarding procedures in accordance with this policy will be followed (see 'Procedures for dealing with concerns about a child'). This means that if a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by another child, or that a child may be at risk of abusing or may be abusing a child, they should discuss their concern with the DSL without delay so that a course of action can be agreed.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told. All staff are trained to manage a report. Effective safeguarding practice includes:

• if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;

• not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

• recognising that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;

• recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can memory and so children may not be able to recall all details or timeline of abuse;
• keeping in mind that certain children may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation;

• listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

• considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

• only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;

• where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS guidance on Sharing nudes and semi-nudes: advice for education settings working with children and young people.

• informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

If a staff member has a concern that a child may be at risk of or experiencing abuse by another child or that a child may be at risk of abusing or may be abusing other children, they should discuss their concerns with the DSL or DDSL without delay so that a course of action can be agreed.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The school treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the

abuse, and the child who has allegedly been responsible for it. Immediate consideration will therefore be given as to how best to support and protect all children involved/impacted.

The school will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by the DSL or the DDSL and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The school recognises that children with special educational needs and disabilities can be more prone to child-on-child group isolation than other children and will consider extra pastoral support for those children from the SENCO.

A student against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from the relevant local safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the relevant local safeguarding partners, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the relevant local safeguarding partners such as children's social care and/ or the Police as appropriate.

For detailed information on what sexual violence and sexual harassment constitutes, the definition of consent, important context to be aware of, related legal responsibilities for schools and colleges, advice on a whole school or college approach to preventing child-on-child sexual violence and sexual harassment and more detailed advice on responding to reports see the Department for Education's statutory guidance: ***Keeping Children Safe in Education (2026), Part 5 – Child-on-child sexual violence and sexual harassment***

Reports concerning harmful sexual behaviour (including sexual violence and sexual harassment)

Where a report concerns an allegation of sexual violence and/or sexual harassment, if possible two members of staff should be present when managing a report (preferably one of them being the DSL or DDSL). The DSL or DDSL should be informed as soon as practically possible if they were not involved in the initial report.

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. This will include:

- The wishes of the victim;
- The nature of the alleged incident;
- The ages of the children involved;
- The developmental stages of the children involved;

- Any power imbalance between the children (e.g. is/are the alleged perpetrator(s) significantly older, more mature, confident and of well-known social standing? Does the victim have a disability or learning difficulty?);
- If the alleged incident is a one-off or sustained pattern of abuse (NB: sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- That sexual violence and sexual harassment can take place within intimate personal relationships between children;
- Any ongoing risks to the victim, other children, adult students, or school staff;
- Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- Other related issues and context, including any links to child sexual exploitation and child criminal exploitation.

Any response and action will, as always, have at the centre the best interests of the child. The DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report.

When there has been a report of sexual violence, the DSL or DDSL should make an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the "victim";
- the alleged "perpetrator"; and
- the other children (and, if appropriate, staff) at the school.

The DSL will consider as part of the school's response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the "victim" and alleged "perpetrator "and considerations regarding shared classes, sharing school premises and school transport. Any professional risk assessment will inform the school's approach.

The police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children's social care.

If the DSL decides to make a referral to children's social care and/or a report to the police against a "victim's" wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL or DDSL will also work closely with children's social care and other agencies are required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children's social care to ensure the welfare and safety of all

children and update the risk assessment and ensure relevant protections and measures are in place for all children.

The school will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action, the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer-on-peer abuse and the causes of it. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the school.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The school recognises that good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the school in meeting its Public Sector Equality Duty.

Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, TRAINEE TEACHERS, VOLUNTEERS AND CONTRACTORS

The school's procedures for managing concerns/ allegations against staff who are currently working in the school follows Department for Education statutory guidance and local safeguarding partners arrangements and applies when staff (including supply staff, volunteers and contractors) have (or are alleged to have):

- Behaved in a way that has harmed a student or may have harmed a student.
- Possibly committed a criminal offence against or related to a student; or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to 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 (including behaviour that may have happened outside school, that might make them unsuitable to work with children ("transferable risk"). Advice can be sought from the LADO in assessing transferable risk).

Non-recent allegations

Allegations against an adult that is no longer working/volunteering with children should be referred to the Police. Where it is known that the adult is still working/volunteering with children, all

allegations (including historical/non-recent allegations of abuse) should be referred to the Police and the LADO in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to a school that they were abused as a child, they should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the Local Authority 'designated officer' (LADO) on a no-names basis (if local safeguarding procedures allow).
All allegations should be investigated as a priority to avoid any delay.

Allegations that may meet the harms threshold.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'Case Manager' who is the Head. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of the LGB and Head of Safeguarding. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of the LGB, Head of Safeguarding and LADO and designated officer and if appropriate, children's social care and the police.

2. Welfare of the child: Where the Case Manager deems that a child has been harmed, or there to be an immediate risk of harm to a child, or if the situation is an emergency, the DSL (or DDSL) should contact Children's Social Care and, as appropriate (e.g., if there is evidence of a possible criminal offence), the Police immediately.

3. Investigating and supporting the person subject to the allegation: Before contacting the LADO, schools should conduct basic enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future police investigation, such as:
   - Was the individual in the school at the time of the allegation?
   - Could they have encountered the child?

   Schools should establish what initial information the LADO will require, and if in doubt check with the LADO before undertaking any initial enquiries, to ensure not to prejudice the position.

4. The Case Manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the Case Manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the Case Manager may involve the Police immediately.) The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

5. All discussions should be recorded in writing, and any communication with both the individual and the parents/guardians of the child(ren) agreed with the Police/LADO. The Designated Officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

6. The Case Manager will ensure that the individual who is subject of the allegation is informed as soon as possible and explained the likely course or action, unless there is an objection by children's social care or the Police. The Case Manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

7. Suspension: The Case Manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The Case Manager will give due weight to the views of the LADO, the HR adviser, as well as the police and children's social care if relevant when making a decision about suspension. Where the individual is suspended, the Case Manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.

8. Support for the member of staff: whilst the welfare of the child is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved.

9. The Case Manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.

10. Further investigation: where further investigation is required, the LADO and Case Manager will agree how and by whom the further investigation will be undertaken.

11. The Case Manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA) should be made, noting the requirements of KCSIE 2025. For instance:

    a. If: 1) the allegation is substantiated; and 2) the person is dismissed (including by an agency) or the school (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services, then the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

    b. The employer has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
        i. engaged in relevant conduct in relation to children and/or adults,
        ii. satisfied the harm test in relation to children and/or vulnerable adults; or
        iii. been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

c. In a case involving serious professional misconduct by a teacher, the Case Manager must consider whether to make a referral to the TRA. In certain cases, the TRA will consider whether to prohibiting the individual from teaching.

12 Where the initial discussion leads to no further action, the Case Manager and the LADO should record the decision and justification for it; and agree on what information should be put in writing to the individual concerned and by whom.

13 On conclusion of the case, the Case Manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designated officer and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

14 For all other cases, where the allegation concluded to be either unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the designated officer) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

15 **Settlement:** Compromise or settlement agreements **should not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children and will not prevent a police and/or school investigation, or referral to the DBS or TRA where the criteria are met. Failure to do so is a criminal offence. The school will continue its investigation if the person leaves, resigns or ceases to provide their services. Schools should check the relevant provisions of KCSIE 2025.

Information sharing

Staff should be mindful of the guidance set out at paragraphs 372-380 KCSIE 2025 in relation to sharing information between safeguarding partners during the process of managing allegations against staff.

The school will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegation Outcomes

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE 2025 and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions in accordance with KCSIE 2025. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance.

If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

Supply teachers, trainee teachers and all contracted staff

In some circumstances the schools will have to consider an allegation against an individual not directly employed by them; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business. Where this applies, they will share safeguarding responsibilities with the employment agency or business. The school remains responsible for gathering the facts and managing the safeguarding process, while working closely with the employment agency or business, which will usually lead on any disciplinary action.

Whilst the schools is not the employer of supply teachers, they are still responsible for ensuring that allegations are dealt with properly. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.

Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or local authority children's social care. The school will usually take the lead on handling allegations to ensure that all appropriate action is taken. This is because agencies do not have direct access to children or other school staff and are therefore unable to gather the facts when an allegation is made or hold all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the governing body or proprietor when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are considered by the school during the investigation.

When using a supply agency, the school will inform the agency of the process for managing allegations but also take account of the agency's policies and the duty placed on agencies to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where concerns or allegations relate to a trainee teacher placed within a school, the expectations of the school set out above also apply. In addition, teacher training providers are expected to follow the same procedures as set out for supply agencies.

LGB Members

If an allegation is made against a LGB Member, the school will follow its own procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

Organisations or individuals using school premises:

If School receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities) the school will follow the safeguarding policies and procedures, including information the LADO.

CONCERNS THAT DO NOT MEET THE HARM THRESHOLD/LOW – LEVEL CONCERNS POLICY

As part of their whole school approach to safeguarding, the school will ensure that they promote an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school (including supply teachers, volunteers (including governors) and contractors) are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

•being over friendly with children;

•having favourites;

•taking photographs of children on their mobile phone;

•engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

•humiliating children.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Sharing/reporting a concern

Low-level concerns about a member of staff (including supply staff, volunteers, and contractors) should be reported to the designated safeguarding lead (or deputy). Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the Headmaster. If someone is unclear who they should share their concern with, they should share it with the

United Learning Safeguarding Lead, who is part of the Central Office Team. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. The DSL should inform the Headmaster of all the low-level concerns in a timely fashion according to the nature of each particular low-level concern. The Headmaster should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL the Headmaster may wish to consult with the DSL and take a more collaborative decision-making approach.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school, that concern should be shared with the DSL and/or the Headmaster, and recorded in accordance with the school's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the staff member sharing the concern does not wish to be named, the school will respect this person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example where it is necessary in order to carry out a fair disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share low-level concerns.

If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold they should consult with the LADO.

Self-Reporting

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for several reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

How should a low-level concern be responded to:

The DSL/Headmaster should:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided.
- review the information and determine whether the behaviour (i.) is entirely consistent with the school's Code of Conduct and the law, (ii.) constitutes a low-level concern, (iii.) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies.
- where the DSL/Headmaster is in any doubt whatsoever, they should seek advice from the LADO;
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Advice should be sought from Human Resources and Legal Services (where necessary) about next steps.

There are several potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law it will still be important for the DSL/Headmaster to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; In addition, the DSL/Headmaster should speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.
- Some will not give rise to any ongoing concern and, accordingly, will not require any further action.
- Others may be most appropriately dealt with by means of management guidance and/or training.
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.
- Some low-level concerns may also raise issues of misconduct or poor performance.
- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate.
- A referral to the LADO as the school believes the threshold has been met.
- The school should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

The DSL/Headmaster should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews should be made.

Recording concerns

All procedures for recording and storing of records should comply with United Learning's Data Protection Policies.

All low-level concerns should be recorded in writing by the DSL/Headmaster. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

There should be appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses.
- all external conversations – for example, with the LADO/other external agencies.
- the rationale for decisions.
- any action taken.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The school should retain the record consistent with complying with group data protection policies. The school should retain all records of low-level concerns (including those which are subsequently deemed by the DSL/Headmaster to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as the DSL/Headmaster and the individual they report to (e.g., Regional Director); and senior HR officer,

and the individual they report to (e.g., Head of HR). The DSL/Headmaster may store the central low level concerns file with her other safeguarding and child protection records.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE 2025.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Where a low-level concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it should be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

The school will refer to Part Four, Section Two of Keeping Children Safe in Education for further advice and guidance.

STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The School's Code of Conduct policy can be found C:\Tranby\Whole School - General\School Policies\Other Whole School Policies.

The aim of the Code of Conduct policy is to provide clear guidance about behaviour and actions and responses to low level concerns in order not to not place students or staff at risk of harm or of allegation of harm to a student.

SAFER RECRUITMENT

The school is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional

overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

Full details of the school's safer recruitment procedures for checking the suitability of staff, members of the School LGB and Trustees of ULT and volunteers to work with children and young people is set out in

- United Learning / the School's Recruitment and Selection Policy;
- United Learning's Safeguarding Children – HR Procedural Guidance;
- United Learning's LGB Handbook; and
- United Learning's guidance: Trustees - Recruitment, Appointment, and Removal Process

These documents are available on the United Learning Hub.

The school's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised as set out below.

Visitors to the School including contractors and volunteers are asked to sign in and are given a badge to confirm that they have permission to be on site.

Visitors, contractors and volunteers engaged in regulated activity must be subject to enhanced DBS checks. If not engaged in regulated activity the school must ensure that appropriate supervision is in place.

Visitors to the School invited to address students either in assembly, PSHE or RSE sessions will be required to complete the necessary documentation in the Visiting Speakers Policy.
School Admin will always check the identity of contractors and their staff on arrival at the school by inspecting photo ID.

If other organisations provide services or activities on our site on our behalf including Agency Supply staff, we will obtain written assurances that these organisations have appropriate safeguarding, safer recruitment and DBS / vetting procedures in place.

The school will follow KCSiE 2025 statutory Guidance advice in such cases.

If Supply Staff are engaged directly by the school the appropriate checks must be carried out by the school.

The Single Central Record is maintained to ensure that all appropriate staff, volunteers, LGB Members, agency and contracted staff in Regulated Activity are entered on it.

Any organisations or individuals booking the school site or parts of it will be checked as far as possible for suitability including possible extremist activities and recruitment.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Annabel Robinson who is a member of the senior leadership team. Fraser Henderson is Deputy DSL.

Sarah Maynard is the Safeguarding Lead in the Prep School (and Deputy DSL) and is the person to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL or DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL's responsibility is to maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies, to liaise closely with Safeguarding partners (such as children's social care and the police), support staff in carrying out their Safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL or DDSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL and DDSL will ensure that any educational or safeguarding assessments of children consider the wider contextual environmental factors present in the child's life outside the school or family and inform the development of support for learning, attendance, behaviour and mental and emotional health

The DSL works with the LGB to review and update the school's safeguarding policy. Where a student leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives. The school will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

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

The DSL will inform the safeguarding partners of any incident which they think should be considered for a child safeguarding practice review.

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

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL or DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements are as follows and in order:

1. Contact Annabel Robinson on the following number: 01482 657016. This should be followed with an email to annabel.robinson@tranby.org.uk
2. In an emergency and if unable to get hold of Annabel Robinson telephone SaPH on 01482 395500 or the OUT OF HOURS EMERGENCY DUTY TEAM on 01377 241273 or the Police on 999.

Full details of the DSL's role can be found at Annex C of KCSIE 2025.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

TRAINING

Induction and training (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) are in line with advice from local safeguarding partners.

All Staff

All new staff will be provided with induction training that includes:

- the child protection policy, including online safety and including information about the identity and role of the DSL and DDSL
- the behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the safeguarding response to children who go missing from education
- the staff code of conduct policy including the school's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of KCSIE (current edition / publication)
- School leaders and staff who work directly with children will also be required to read Annex A of KCSIE

When new staff or volunteers start at the school, they are briefed on the school CP and Safe Working procedures and given time to read and discuss the following:

- Keeping children safe in education part 1 and Annex B (September 2025- DfE).
- Tranby School's Behaviour, Anti-Bullying, Whistleblowing, Staff Code of Conduct and Child Protection policies found in Whole School - Policies\School Policies and on the school website

- United Learning's Staff-Pupil Relationships Letter and Guidance together with the acceptable use of ICT and online safety

- 'What to Do if You Are Worried a Child is being Abused' (March 2015)

- Prevent training via https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html

- The roles and responsibilities of the DSL and the DDSL

- CME guidance

All staff must confirm that they have read and understood the above.

Other short term or visiting staff and volunteers are made aware of the CP reporting procedures within the school and the School Code of Conduct. Copies of the above documents are provided to all 'staff' during induction. On appointment and as part of United Learning Annual Declaration, all staff will receive and sign the up-to-date versions of the Staff Student Relationship Letter and

Acceptable Use Declaration. The staff code of conduct can be found in the Staff Handbook, a copy of which is available on the school intranet.

All staff are also required to:

- Read Part One of KCSIE and confirm that they have done so. Each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the changes via e-mail.
- Understand key information contained in Part One of KCSIE. The school will ensure staff understanding by completing a short survey.
- Receive training in safeguarding and child protection regularly, in line with advice from the local safeguarding partners. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The school provides these via, emails, e-bulletins and staff meetings.

DSL(s) – Designated Safeguarding Lead(s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the local safeguarding partners approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of KCSIE.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL is trained to the same level as the DSL.

To ensure continuity of safeguarding responsibilities, the school implements robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. These include the DDSL covering all aspects of the role, alongside the Headmaster for support.

Whilst external catering and maintenance staff are not technically United Learning/school employees (and therefore safeguarding training is not the responsibility of the school), they should receive an appropriate safeguarding induction to ensure they are aware of and understand all the school's relevant safeguarding policies (e.g. safeguarding policy/whistleblowing policy).

LGB Members and Trustees

All LGB Members and trustees must receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. This training should be regularly updated.

All LGB Members (and proprietors) should ensure child protection files are maintained as set out in Annex C of KCSIE 2025. The DSL attends all LGB meetings to update all LGB Members on safeguarding and child protection matters.

All LGB Members (and proprietors) should be aware of their obligations under the Human Rights Act 1998 and the Equality Act 2010 and their local multi-agency arrangements.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Christie Spurling is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. Graham Dunn is the LGB lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the school.

A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. This is done by the DSL and DDSL in collaboration with the LGB. The Local Safeguarding Partners' Safeguarding Audit tool is also completed. The school draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

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

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Opportunities to teach safeguarding :

The LGB ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships and Sex Education and Health Education and PSHE.

The school provides 'Preventative Education' in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. These will be underpinned by the school/college's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This programme will tackle, at an age-appropriate stage, issues such as:

• supporting children to develop the skills that form the building blocks of all positive relationships

• healthy and respectful relationships

• boundaries, consent and kindness in relationships

• stereotyping, prejudice and equality

• body confidence and self-esteem

• how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour

• the concepts of, and laws relating to – all forms of sexual harassment, and abuse, and how to access support,

• what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and

• understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

The school recognises the additional risks that children with SEND face online and works with the Head of IT to ensure that additional support and measures are in place to support these children. Online safety is an integral part of the school's curriculum for all pupils and is taught in an age-appropriate way relevant to pupils' lives. It is essential that children are safeguarded from potentially harmful and inappropriate online material. A whole school approach is taken to online safety in the school's e-safety policy that empowers the school to protect and educate pupils, students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

It is also embedded in PSHE and Relationships and Sex Education. Pupils will be taught what positive, healthy and respectful online relationships look like; the effects of their online actions on others; how to recognise and display respectful behaviour online; how to use technology safely, responsibly and securely; and where to go for help and support when they have concerns.

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online a review, of their effectiveness is carried out at least once every academic year. The review is carried out by the SLT member responsible for filtering and monitoring, with the support of the school's designated safeguarding lead and IT support. This include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks. The school ensures that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The school considers the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks. The safety and monitoring system used is FortiGate. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

The leadership team and relevant staff must have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively. Any concerns when identified should be reported in the first instance to the DSL.

The school will communicate with parents and carers to reinforce the importance of children being safe online and to help them to understand what systems the school uses to filter and monitor online use. The school will make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Further detail of the school's approach to online safety can be found in our E-Safety policy on our school website.

Looked after children (and previously looked after children)

Looked after children (and previously looked after children) are a particularly vulnerable group. The school will ensure that prompt action is taken when necessary to safeguard these children and the LGB ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

Annabel Robinson is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs are met. The school ensures that the designated member of staff receives appropriate training in order to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

Children potentially at greater risk of harm (Children who need a social worker - Child in Need and Child Protection Plans)

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

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

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils, and children missing education (CME) supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Young carers

Schools should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support, at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Children requiring mental health support

The schools has an important role to play in supporting the mental health and wellbeing of pupils.

All staff should be 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 suicide. They could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Whilst education staff are not expected to diagnose or treat mental health problems; they still have an important role to play. Specifically, they can support the fulfilment of four key roles:

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

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

• ensuring early targeted support is provided, and

• liaison with/referral to specialist services where needed.

Schools should use the United Learning's Tiered Model for a Mentally Healthy School (available to schools on the United Learning Hub) to support their approach to mental health. This tiered model has been developed by United Learning to support school Senior Mental Health Leads (SMHLs) and those with responsibility for pupil mental health and wellbeing (e.g. DSL/DDSL) to:

- Better understand what they are accountable for at school level to ensure pupils' mental health and wellbeing, and what needs to be in place to build a mentally healthy school with a strong sense of belonging;
- Know how to accurately categorise children's mental health across a continuum to identify appropriate interventions in school (e.g. a safety plan) or relevant external support;

- Ensure that risk assessments and safety plans are aligned with the graduated approach, moving from universal to targeted and specialist support as need increases;
- Identify when concerns meet the threshold for more intensive intervention or multi-agency involvement, including where safeguarding risk is present.

Safeguarding children with medical conditions

A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place in a school or college, the responsible healthcare professional, in conjunction with the DSL should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

Children who are questioning their gender

It is not for schools and colleges to initiate any action in this area; this is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school or college is responding.

Schools and colleges should take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Schools and colleges should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Schools should not initiate any action regarding social transition. Where a child or their parent has made a request. Members of staff should not adopt any changes relating to social transition unless a decision has been made by the school in consultation with parents or carers.

When considering any request for support with social transition, the schools will ensure that their decision-making process is documented and records are kept.

In making decisions about supporting social transition, the school must comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the child and other children.

Decisions will be in line with the following principles and the school will ensure that their decision-making process is documented and records are kept:

- Schools and colleges have statutory duties to safeguard and promote the welfare of all children;
- Parents and carers should be actively involved and their views treated with importance;
- Accommodating social transition is an active intervention so schools should take a very careful approach;
- Schools should comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition;

In all cases the school will refer to the guidance set out in Keeping Children Safe in Education.

Mobile Phone Policy

The school is a mobile phone-free environment by default; anything other than this should be by exception only.

Restrictive interventions, including the use of reasonable force

There are times when the use of restrictive interventions will be lawful and necessary; for example, to keep individuals and the wider school community safe. The school is aware of statutory guidance from the Department for Education issued under section 93A of the Education and Inspections Act 2006 and must have regard to this in relation to recording and reporting each significant incident involving the use of force by members of staff and of non-statutory guidance outlined in 'Restrictive interventions, including the use of reasonable force, in schools' (DfE, current version).

The school recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions. The school will consider its duties under the Equality Act 2010. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

The school has a use of reasonable force policy which can be found at Use of Force.docx or on the school website.

1. Staff will ensure that the school policy on 'Use of Force' is followed.

2. All incidents requiring such action will be logged with the Headmaster or appropriate Senior Manager, and parents/guardians informed on the same day.

3. Incident Reports by all staff involved will be completed as soon as possible after the incident on the same day, unless in exceptional circumstances.

4. Staff must only use physical intervention as a last resort to protect the safety of children or adults after appropriate de-escalation strategies have been used or in the event of serious situations where this is not possible.

5. Restorative methods will be considered after each incident and the pupil's views on the incident sought.

6. Support will be offered to staff involved and incidents will be reviewed by senior staff not involved directly.

Arrangements for Visiting Speakers

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The school's responsibility to students is to ensure that they can critically assess the

information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will consider any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

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

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

Any organisations or individuals booking the school site or parts of it will be checked as far as possible for suitability including possible extremist activities and recruitment.

Use of school premises for non-school activities

Where governing bodies or proprietors hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school staff their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body or proprietor will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of premises; and that failure to comply with this would lead to termination of the agreement. The guidance on keeping children safe in out-of-school settings details the safeguarding arrangements schools and colleges should expect these providers to have in place.

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

Where staff work in, or are involved in the management of, the school's early years or provision of care of students under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. This forms part of the school's safer recruitment practices, further details of which can be found in the School's Recruitment and Selection Policy.

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

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

Use of mobile phones and cameras

The school's policy on the use of mobile phones and cameras in the setting can be found in the School's Acceptable Use Policy. C:\Tranby\Whole School - General\School Policies\Other Whole School Policies

All EYFS staff are also referred to United Learning E-Safety Policy (available on the United Learning Hub).

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Sarah Maynard.

Duty to notify/report to Ofsted a serious childcare incident:

The school will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the school is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the school became aware (or ought reasonably to have become aware) of it.

The school will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

The school must inform Ofsted about:

- the death of a child
- where a person's suitability to look after children might be affected, including:
    - involvement with social services or the police
    - something significant affecting their health

- events that might affect the smooth running of the childcare, such as a fire or flooding at the premises
- serious accidents, injuries or illnesses to a child
- food poisoning affecting 2 or more children

The school will notify Ofsted of a serious accident, illness or injury to, or death of, any child while in their care, and of the action. Notification must be made as soon as is reasonably practicable, but in any event within 14 days of the incident occurring. A registered provider, who, without reasonable excuse, fails to comply with this requirement, commits an offence. Providers must notify local child protection agencies of any serious accident or injury to, or the death of, any child while in their care, and must act on the advice of those agencies.

Absences

The nursery will follow up on absences in a timely manner. If a child is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts. The nursery will consider patterns and trends in a child's absences and their personal circumstances and use their professional judgement when deciding if their absence should be considered as prolonged. Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

The nursery has an attendance policy that they share with parents and/or carers. This includes expectations for reporting child absences and the actions the nursery will take if a child is absent without notification or for a prolonged period of time, for example: implementing the setting's safeguarding procedures, following up with the parents and/or carers and contacting emergency contacts if parents and/or carers are not contactable.

Where possible, settings should hold more than two emergency contact numbers for each child.

Waiver from Disqualification

In certain circumstances, a person who is disqualified from registration by Ofsted may apply to Ofsted for a waiver of disqualification unless, for example, they are barred from working with children.

Safe Working Practice

Children's privacy is considered and balanced with safeguarding and support needs when changing nappies and toileting.

Police attendance on school site (Statutory Guidance – PACE Code C 2019)

Students may only be interviewed at their place of education in exceptional circumstances and only when the Headmaster or their nominee agrees. Every effort will be made to notify the parent(s) or other person responsible for the student's welfare and the appropriate adult, if this is a different person, that the police want to interview the student and reasonable time will be allowed to enable the appropriate adult to be present at the interview. If awaiting the appropriate adult would cause unreasonable delay, and unless the student is suspected of an offence against the educational establishment, the Headmaster or their nominee will act as the appropriate adult for the purposes of the interview.

POLICY REVIEW

Policy reviewed by Mr Paul Grimwood, Chair of LGB:

Signed:

Date: 02/09/2026

APPENDIX 1 –FURTHER INFORMATION

All staff should be aware of indicators of abuse and neglect, as well as specific safeguarding issues such as child criminal exploitation and child sexual exploitation. Staff should always be vigilant, and if unsure, should **always** speak to the DSL or DDSL.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from other children within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

This appendix contains important additional information about specific forms of abuse and safeguarding issues.

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

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

Sexual abuse: involves forcing or enticing 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 (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)
We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

• appear with unexplained gifts, money or new possessions which 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 and sexual exploitation

• associate with other children involved in exploitation

• suffer from changes in emotional well-being

• misuse alcohol and other drugs

• go missing for periods of time or regularly come home late, and

• regularly miss school or education or do not take part in education.

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

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

• have older boyfriends or girlfriends; and

• suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in the DfE guidance: Child sexual exploitation: guide for practitioners.

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.

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

• go missing (from school or home) and are subsequently found in areas away from their home

• have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)

• are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs

• are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection

• are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity

• owe a 'debt bond' to their exploiters, and

• have their bank accounts used to facilitate drug dealing.

Children who are absent from education

All staff should be aware that children being absent from school or college, 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, honour or faith-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 their school or college's unauthorised absence procedures and children missing education procedures.

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, and,

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

Operation Encompass

Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse.1 This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Modern slavery and the National Referral Mechanism

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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

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

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

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved in serious violence. These may include:

• increased absence from school or college

• a change in friendships or relationships with older individuals or groups

• a significant decline in educational performance

• signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and

• 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.

The likelihood of involvement in serious violence may be increased by factors such as:

• being male

• having been suspended, spent time in Alternative Provision or permanently excluded from school, and

• having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places.

Honour or faith-based abuse (including female genital mutilation 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.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

FGM mandatory reporting duty for teachers

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.157 Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

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.

APPENDIX 2 – Meet the Safeguarding Team:

The Designated Safeguarding Lead (DSL) is:

Annabel Robinson

located in F3 and F41

Deputy Designated Safeguarding Lead (DDSL

Fraser Henderson
Located in Boys PE

The Safeguarding Lead (Prep) (DDSL)is:

Sarah Maynard

located in the Prep School

APPENDIX 3 - Safeguarding Training Log

Safeguarding Training Log		
Attendees	**Type of training provided**	**Date undertaken**
Headmaster	KCSiE 2026 update training	September 2026
DSL	KCSiE 2026 update training Working together to safeguard Children FGM online training Safer Recruitment Training	September 2026 November 2026 October 2023 October 2026
DDSL	KCSiE 2026 update training Working together to safeguard Children	September 2026 November 2026
Senior Leadership Team	KCSiE 2026 update training	September 2026
Pastoral Leads	KCSiE 2026 update training	September 2026
Whole School	KCSiE 2026 update training	September 2026
e-safety Lead	KCSiE 2026 update training	September 2026
P.E. staff	KCSiE 2026 update training	September 2026
First Aiders	KCSiE 2026 update training	September 2026
Chair of LGB	KCSiE 2026 update training	September 2026
Nominated Safeguarding member of LGB	KCSiE 2026 update training	September 2026
Local Governing Body (whole board)	KCSiE 2026 update training	September 2026
Agency Staff /Peripatetic	KCSiE 2026 update training	September 2026
Volunteers	Safeguarding Guidelines	As appropriate
Contractors	Safeguarding Guidelines	As appropriate

APPENDIX 4 – STAFF/STUDENT RELATIONSHIP LETTER AND GUIDANCE NOTES

Tranby
Tranby Croft
Anlaby
East Yorkshire
HU10 7EH

September 2026

Dear Colleague,

Every one of us working within United Learning, whatever our role, is acutely aware that the protection of children is of the highest possible importance. Trust underpins everything that we do in schools. The parents of our pupils entrust the care of their children to us and together we are all responsible for their wellbeing. United Learning also has a responsibility to ensure that those working in our schools are themselves protected - against putting themselves in a vulnerable position and against the possibility of false accusation.

This letter has also been prompted by the isolated actions of a small number of employees who have acted improperly or who have found/put themselves in a vulnerable position. The focus on appropriate use of social media remains a priority for us. Instances where inappropriate usage has been identified has led to disciplinary action including in the most serious cases dismissal for gross misconduct. I am writing to every person employed by United Learning to remind us all just how serious these matters are but also to offer some advice as to how to respond in potentially difficult situations. Heads will discuss this issue with their staff at appropriate times during the school year. This letter reinforces those statements and ensures that no-one associated with our schools is in any doubt that child protection is an issue that must be treated with the utmost seriousness. Acts of child abuse may be blatant and incontrovertible. However, they may also be more subtle.

It must be understood that the following are almost always inappropriate within the professional context of schools and can easily be construed as child abuse in some circumstances:

- touching and physical contact, other than for staff working with very young children in primary or nursery settings, where it is expected that they will have necessary physical contact and display affection to properly fulfil their role to nurture, support and care for those children.
- contact through electronic or digital communications using personal accounts.

Against this background, we must ensure that no situation could arise which is or could reasonably be construed as acting against the safety of each child. This is not always an easy line to draw but crossing that line or being in a position where it appears that the line has been crossed, is unacceptable. Some adults within the school undertake roles where this is even more important because of the ease with which the proper execution of their duties might be misinterpreted or because the vulnerability of the young people in their care might be more easily exploited. These might include those:

- working in boarding houses or residential situations, including, for example, school trips and excursions.
- whose work requires them to interact in a one-to-one situation, particularly when that work takes place behind closed doors as is often the case with peripatetic music lessons.

- whose work by its nature requires some physical contact with children, for example, those working with very young children and those involved in the coaching of sport or other practical subjects where a correct technique may need to be demonstrated.
- who have high levels of access to ICT systems and, indeed, all who use the internet, email, text messaging and other forms of electronic communication.
- young employees and workers whose duties require them to work with older pupils (e.g., sixth formers) where the age differential is quite small.
- who work with especially vulnerable children for example those with special educational needs, disabilities, mental illness or those that require intimate care.

Within each school, Heads will issue both verbal and written guidance from time to time and will make available appropriate training to help everyone deal with this difficult issue. A statement of guidance follows this letter. The DfE has published updated guidance for all schools on their duties to safeguard and promote the wellbeing of children, Keeping children safe in education - GOV.UK (www.gov.uk). It is important that you are familiar with this guidance and, as a statutory minimum, have read and can demonstrate your understanding of your responsibilities in relation to Keeping Children Safe in Education Part 1.

Finally, having said all this, it is still important for all of us to retain an appropriate balance. United Learning greatly appreciates the devotion and commitment of all of you who work in our schools. We know that your work is effective because every day you respect and care for children, enjoy their company and celebrate their achievements. The trust placed in us as we guide young people through their formative years is huge; we all need to help each other shoulder this responsibility to the very best of our ability. Thank you again for all you have done and continue to do for children and young people through this particularly difficult time.
Yours sincerely

Sir Jon Coles
Chief Executive
United Learning

Mr C Wainman
Headmaster
Tranby

UNITED LEARNING NOTES OF GUIDANCE FOR STAFF-STUDENT RELATIONSHIPS 2026

This guidance is not exhaustive and is designed to set out principles rather than to give detailed and specific advice. Clearly, the circumstances in which staff work vary (e.g., working with very young children, boarding staff, sports staff, etc.); this guidance is meant to give general principles only. Indeed, for staff working with very young children in primary or nursery settings it is expected that they will have necessary physical contact and display affection to properly fulfil their role to nurture, support and care for those children. Although this advice applies primarily to teachers and to other adults with educational roles, all adults working within schools relate to students during their duties; again, the general principles apply equally to all who are involved in the school. Staff should be aware that departure from this guidance could result in disciplinary action.

1 The relationship between staff and students is a professional one. It is fully expected – and, indeed, hoped – that staff in the school have a friendly and caring relationship with students; nevertheless, the basis of that relationship is professional not personal. It is suggested that a good test to apply is to reflect on whether the child's parents would be happy with the relationship if they were standing with you.

2 A personal relationship between staff and a student is inappropriate unless it is with the full knowledge and consent of the student's parents or guardians. Circumstances in which such a personal relationship may arise might be when your own children are friends with those in the school or when you have a personal relationship with parents of children in the school. It is not normally appropriate for a member of staff to meet with a student out of school hours or off school premises except with the prior knowledge and consent of parents and the school.

3 In general, unnecessary physical contact with students must be avoided. In some circumstances, physical contact between a member of staff and a student is necessary and beneficial; it might be, for example, that a reception teacher might need to pick up a 5 year old who has fallen over in the playground, a sports coach may need to demonstrate to a student how to hold a racket or a secondary teacher may give a student a gentle pat on the back as encouragement. In rare circumstances it may be appropriate for members of staff to use reasonable restraint in circumstances where a student is behaving in a manner which endangers him or herself or other people. In these situations, staff are advised to be very sensitive to the student's likely reaction and to watch out for signs that the student is apprehensive or uncomfortable. We all have our own personal space that needs to be protected.

4 Over-familiar words and actions, displays of affection, discussion of one's personal life or the personal life of the student are almost always inappropriate. Sexual innuendo is wrong in all circumstances. Staff must avoid actions, words or expressions that could be interpreted as suggesting that they have an emotional relationship with any student. In the professional staff-student relationship it is not appropriate to single a student out for favours or to suggest to a student that he or she is a special friend.

5 Occasionally it is necessary for professional academic reasons for staff to communicate with students out of school. Except where necessary, personal email addresses, home, mobile phone numbers, social media contact details, online aliases or text-based messaging aliases must not be given, asked for or used. A staff mobile phone number might be given to students for use during an educational visit; where possible, the school's mobile phone (if there is one) should be used for this purpose. Pastoral matters should not normally be dealt with by personal email or using personal phone contacts. Only in the most exceptional circumstances, for instance, where there is well-founded concern for the unexplained whereabouts of a student, should pastoral matters be dealt

with by personal email, using personal phone contact or other personal communication tools. In any event, records of all contacts must be kept on the student file so that if it is necessary to use email or personal contact, the reason why will be specified in the written record. It is very difficult to envisage circumstances under which individual contact is appropriate except through official school channels.

6 It is not normally appropriate for students to visit a member of staff in their own home. Such a visit might be more likely within a boarding context where staff live on site and so might invite a group of students– say, a tutorial group – to their house for a meeting or for a celebration. Where such a visit does take place, it must be with the full knowledge and consent of the School and parents/guardians. If possible, more than one adult should be present on such an occasion.

7 With older students, where a gathering is held as part of a celebration, it is generally advisable if that is held on school premises. It is essential that professional criteria (e.g., all the students in a particular teaching or tutorial group) rather than personal criteria (e.g., selected students only) are used for inviting students, that the event is held openly, and that senior colleagues are aware of it. Staff on such an occasion have a particular duty to ensure that the supply and consumption of alcohol is appropriate, is responsible and falls within the law and the school's guidelines on alcohol. As a rule, staff should not consume alcohol whilst in the company of children. This includes educational visits and celebratory functions. There will be occasional situations where alcohol is served either at a meal or school function and in these instances should be approved by the Head Teacher in advance.

8 Wherever possible when working with students, other people (adults, colleagues or students) should be present, or the door should be open. All members of staff who, in the course of their professional duties, need to work on a one-to-one basis with a student (e.g., a piano lesson, a maths tutorial, etc.), must take care to ensure that the circumstances of the meeting or lesson are always entirely professional. Staff are advised to use a room which has vision panels in the door or keep the door open and ensure that colleagues know that the meeting or lesson is taking place. It is helpful if the meeting or lesson can be arranged during normal school hours or immediately before or after school when there are plenty of other people about. Similarly, where it is necessary for staff to drive students in their own cars, e.g., to sporting fixtures, drivers should ensure they are not alone with just one student, written parental consent should be obtained and a central dropping off point arranged rather than home drops.

9 Staff must avoid threatening words, raised voices and any aggressive contact such as holding, pushing, pulling or hitting, which could amount to, or which could be interpreted as a criminal assault.

10 There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers a broad range of actions that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent injury or violence. 'Reasonable' in these circumstances means 'using no more force than is needed'. This may involve either passive physical contact, such as standing between pupils, or active physical contact such as leading the pupil by the arm. Current DfE guidance is contained in 'Using Reasonable Force: Advice for head teachers, staff and governing bodies' which can be found on United Hub. Members of staff must also ensure they are familiar with the Independent School's/Academy's physical restraint policy and procedures document.

11 Social networking sites used for personal use, such as Facebook, Twitter, Instagram, WhatsApp, online games, digital communication/online services and other digital media, pose risks for all staff in terms of professional integrity and the welfare of students.

(a) Staff must not use these sites to contact or communicate with current students, students who have recently left, or ex-students under the age of 18 or who are still in full time education. Employees wishing to befriend students who are over 18 and who have left school should do so with extreme caution and with the knowledge that any content posted on either ex-students' or their own social network, may not only compromise their own position but that of any colleagues with whom they are also friends and who may not want their content to be seen by any ex-student. Unfortunately, some students post information on their social networking sites which is inappropriate in language or visuals. To view such pages may alter your judgement of students, to be known to be viewing them may alter a student's view of you, and to comment to students about what you have seen is likely to have an impact on your professional reputation, as well as possibly causing distress to students concerned.

(b) Social media should not be used to address concerns regarding a student's welfare, which should instead be raised with an appropriate member of the school's SLT or safeguarding team.

(c) Caution should also be taken when staff become friends with parents of children at the school, or staff with children at the school, when posting or commenting on posts within social media and ensure that they do not put themselves at risk of any accusations or bring their school into disrepute.

(d) Should you become aware of material about yourself, the school, a student, a colleague or the Group, which is inappropriate, the Senior Leadership Team must be informed, and they will instruct a member of staff to check the allegations and inform the appropriate authorities. You must not check it out yourself.

12 Social networking sites used for professional use, such as LinkedIn, Twitter, YouTube, and other social media, also pose risks for all staff in terms of professional integrity and the welfare of pupils. (a) Before using social media for professional purposes, or as part of their teaching, staff should seek guidance and training on the risks associated with using social media.

(b) Staff should not follow students' personal social media feeds even though it is likely that students will be following them. It may be appropriate to follow students if done as part of an educational activity, but this should be properly risk assessed and not using students' personal accounts.

(c) Staff are advised not to accept connection requests on sites such as LinkedIn from students. Accepting requests from ex-pupils post 16 or 18 should be used with care and thought given to how much information is visible to connections – phone numbers, email addresses etc.

(d) When uploading images or posting content on social media platforms, you should not link to children's online personas through tagging or mentions as this will increase the risk to them from online threats. You should also ensure you comply with the school image use policy, such as not including names with pictures and ensuring parental permission has been given before posting a child's image.

(e) All content posted will be linked to you and your employer. Should you become aware of material about yourself, the school, a pupil, a colleague or the Group, which is inappropriate, the Senior Leadership Team must be informed, and they will instruct a member of staff to check the allegations and inform the appropriate authorities. You must not check it out yourself.

(a) Safeguarding Policy and Child Protection Policy and Procedures.

(b) Behaviour and Discipline.

(c) Physical Restraint.

(d) Email and Internet Acceptable Use Policy.

(e) Social Media Policy.

13 If you are at all concerned about anything which has occurred or which has made you uncomfortable, you must discuss the matter with a senior colleague at the earliest opportunity, even if it turns out that nothing untoward has happened. You must make a written record, dated and signed, of any such incident.

14 Where any allegation of abuse is made against a teacher, other member of staff or volunteer, the Group is committed to dealing with the allegation fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

15 Staff will also find information relevant to staff-student relationships in the policies and procedures in their school or academy which they should make themselves familiar with and cover the following:

(a) Safeguarding Policy and Child Protection Policy and Procedures;

(b) Behaviour and Discipline;

(c) Physical Restraint;

(d) Email and Internet Acceptable Use Policy;

(e) Social Media Policy.

Appendix 5

Foundation Stage Mobile digital devices

This policy applies to our EYFS setting.

Tranby is fully committed to ensuring that the application of this Foundation Stage Mobile digital devices policy is non-discriminatory in line with the UK Equality Act (2010).

The School seeks to implement this policy through adherence to the procedures set out in the rest of this document.

This document is available to all interested parties on request from the main school office and should be read in conjunction with the following documents:

- Acceptable Use ICT
- Assessment, Recording and Reporting
- Bring Your Own Device
- Child Protection (Safeguarding)
- Health and Safety Management
- Mobile Phones
- Non-Residential Visits
- Pupil and Parent Privacy Notice
- United Learning Data Protection Policies
- Whistleblowing
- Equal Opportunities Policy

Foundation Stage Mobile digital devices	
Reviewed by:	Mrs K Hannah Head of the Croft
Date of last review:	September 2026
Approved by:	Mr Paul Grimwood Chair of LGB
Date of approval:	September 2026
Reason for changes:	Annual update
Next scheduled date for review:	September 2027

Contents

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Acceptable Use Policy: Cameras/Devices	page 69

Policy Statement

It is our intention to provide an environment in which staff can work without distraction, and in which children, parents and staff are safe from images being inappropriately recorded and used.

We therefore operate the following:

Acceptable Use Policy

Mobile Phones / Smart Watches / Personal Devices

The setting allows staff to bring in personal mobile telephones and devices for their own use, in their own time, away from the children. These are not used to contact current pupils. Contact with parents/carers is made using the school phone system or a school mobile telephone. The use of personal mobile phones or digital devices, in school, to digitally record images or sound is strictly prohibited. Staff bringing personal devices into school must ensure there is no inappropriate or illegal content on the device.

All teaching staff and students must ensure that their mobile telephones/devices are kept securely in a bag, locker or cupboard throughout contact time with children. Staff working in The Croft classroom areas store mobile phones or devices in a locked cupboard. Mobile phone calls or texts are only made and taken at staff breaks or in staff members' own time and in the designated staff areas. Just as staff are not allowed to use their phones whilst working in The Croft, they are not allowed to use the phone capabilities on their smart watches.

In case of a staff emergency, they can use the School's landline phone or make a personal call from their mobile in designated staff areas of the building. If any staff member considers that an emergency requires them to keep their mobile phone to hand, prior permission must be sought from the Head of The Croft and the mobile phone should be placed in an agreed appropriate place.

The School ensures that it has up-to-date personal and emergency contact information of all staff, and staff make their families, children's schools etc. aware of the School's telephone numbers in case of an emergency. This is the responsibility of the individual staff member.

During educational visits and group outings, nominated staff will have access to the School's nominated mobile phone/s, which is to be used for emergency purposes only.

It is the responsibility of all members of staff to be vigilant and report any concerns to a the Prep Head or Prep Safeguarding Lead. Concerns will be taken seriously, logged and investigated appropriately and may lead to dismissal. The School reserves the right to check the image contents of a member of staff or student's mobile phone or digital device, should there be any cause for concern over its appropriate use.

Cameras/Devices

Photographs on school devices are taken as an effective form of recording their progression and achievements; with parental consent (on joining the school and updated annually), they can also be used on the School and company websites, newsletters or for marketing purposes. All photographs are taken and stored appropriately to safeguard the children in our care. The setting is registered with the Information Commissioners Office (ICO) and adheres to Data Protection Legislation.

Ownership:

Tranby is fully committed to ensuring that the application of this policy is in line with Human Rights legislation and the Data Protection Act 2018 and The Copyright, Designs and Patent Acts 1988. All Tranby devices are password-protected; photographs or digital images taken on school premises, by a member of staff, will be wholly owned by the School and must not leave the premises either physically or digitally without the consent of the School and the parents of the child or children concerned.

When a parent has not consented to their child's image being used, staff will comply sensitively, but the child will be not be used in a group photograph unless permission has been sought – in these instances, an emoji is used to fully cover the child's face.

All images taken on devices must be appropriate and never put the child/children in any compromising positions that could cause embarrassment or distress. Under no circumstances are cameras or digital devices of any kind taken into toilets or photographs taken whilst children are changing clothes in a classroom. Children must be appropriately dressed in all photos.

Images taken and stored on digital devices are downloaded as soon as possible onto to the School's intranet, or Tapestry, the School's secure on-line journal. Printed images used for display, publicity and recording activities and progress are disposed in confidential waste bags.

Concerts, Performances, Events, Presentations and Visits

Parents are informed at the beginning of each event that photographs are not permitted. Staff may take photographs/videos as appropriate but will:

- ensure that children are appropriately dressed
- check the returned consent forms
- be aware of any child who should not be photographed

Teacher Training and Portfolios

During teacher /apprentice training and with newly qualified staff, colleagues may need to compile portfolios with photographs of children. Staff will act responsibly in compiling these images. The Mentor will oversee the compiled images as part of the management process and consider their appropriateness.

Children photographing each other using school cameras

Staff maintain appropriate supervision and management control.

Failure to adhere to the contents of this policy will lead to disciplinary procedures being followed.