



Child Protection & Safeguarding Policy

Policy Owner:	Designated Safeguarding Lead
Formally Endorsed By:	Board of Trustees
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Human connection in all we do

1 KEY CONTACTS

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Designated Teacher for Looked after Children	Rebecca Lidert	Rebecca.Lidert@michaelhall.co.uk
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Chair of Trustees	Tali Michaels	Tali.michaels@michaelhall.co.uk
Local Authority Designated Officer (LADO): Consultation via the online portal		Local Authority Designated Officer (LADO): Consultation via the online portal here
Referrals into Early Help and Social Care Single Point of Access:	SPOA	01323 464222 or Contacting the Single Point of Access (SPoA) East Sussex County Council
Emergency Duty Service (after hours, weekends and public holidays)		01273 335905

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CHILD PROTECTION AND SAFEGUARDING POLICY

2 INTRODUCTION

- 2.1 Our whole school approach to safeguarding is based upon an understanding of the local context and an attitude of '*it could happen here*'. At Michael Hall we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment and join us in creating a culture of vigilance. Our school is a community and all those directly connected, staff, volunteers, Trustees, parents, families, and pupils, have an essential role to play in making it safe and secure. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them and feel confident that they will be listened to and taken seriously. **We will always act in the best interests of the child.**
- 2.2 Our pupils' welfare is our paramount concern. The Board of Trustees will ensure that our school will safeguard and promote the welfare of children and work together with other agencies to ensure that our school has robust arrangements to identify, assess and support those children who are experiencing or likely to experience harm.
- 2.3 Safeguarding is not an isolated activity which is undertaken by a select few within only certain areas of school practice. Safeguarding children is everyone's responsibility and everyone at our school who has contact with children and families must play an active role in keeping children safe from harm. In that respect we take a whole school approach to safeguarding, ensuring that it is at the forefront of all our work, that it underpins all of our policies and processes and that everything we do is always with the best interests of the children at heart.
- 2.4 Our school will provide a caring, positive, and stimulating environment that promotes the social, physical, emotional, and moral development of the individual child, and where children feel safe and secure.
- 2.5 We will promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.
- 2.6 We always take a child centred approach to our work and ensure that we listen to the voice of the child so that all children feel heard and understood. When children talk to an adult about a concern, they will always be taken seriously, they will always be supported and kept safe, they will never be given the impression that they are creating a problem or have anything to feel ashamed about.
- 2.7 We understand that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This will not prevent staff from having professional curiosity and speaking to the DSL or the DDSL if they have concerns about a child.
- 2.8. So that children are able and confident to raise concerns with adults, we ensure that our safeguarding systems are well promoted, easily understood and easily accessible. Alongside this we expect all staff to develop positive relationships with children, which build trust and facilitate communication.
- 2.9. To support children who may not wish to directly speak with an adult in the school, we have anonymous posting boxes throughout the school and a dedicated 'Student Concerns' email address which are monitored by key staff in the safeguarding team.

2.10 To support children who may wish to seek help from beyond the school we have posters and signposting to agencies such as Child Line and the NSPCC. Additionally, there are signposting leaflets in the pastoral room and students periodically receive handouts containing useful /supportive numbers/websites

2.11. As well as systems for individual children to raise concerns, we gather pupil voice to understand pupils' experiences, inform the development of safeguarding practice and identify focus areas to address within PSHE lessons. We aim to capture the full breadth of the pupil demographic, including pupils with SEND and those known to be vulnerable.

2.12. So that children are supported to identify and manage risk in their lives we teach a range of knowledge through specific topics related to safeguarding as part of our broad and balanced preventive curriculum.

2.13. Teachers recognise that there are opportunities to reinforce the learning around these topics within all subject areas and will plan to do so. Non-teaching members of staff recognise that they too can support learning in these areas through broader modelling of behaviours or messages.

2.14. We know that the use of technology is a significant component of many safeguarding issues so as part of our whole school approach to safeguarding we have a separate [Online Safety Policy](#) which covers this area of work.

2.15. ^(OBJ)

We recognise that abuse may occur in a range of situations: within families or households, within the community, or online or face to face. We also recognise that it is not only adults who may abuse children but also that children can abuse other children as well.

2.16. All staff have an awareness of safeguarding issues that often overlap and they will look for behaviours and indicators that could be signs that children are at risk.

2.17 We recognise that just because children are not raising concerns, that is not to say that there are no concerns. This is why we listen to children, teach them about risk and safety, and raise awareness around how to seek support.

2.18. We take a zero-tolerance approach to child-on-child abuse. **Further information on this area of practice is within [Appendix B](#) of this policy.** This should also be read alongside the [Anti-Social Behaviour and Bullying Policy](#)

2.19. We understand that children may also cause harm to other family members, including parents/carers and siblings. We will respond to concerns of child to parent/carer and/or sibling abuse to ensure the child and parent/carer and/or sibling is supported and protected, including considering a referral or signposting to [Capa First Response](#).

2.20. We will work with parents to build an understanding of the School's responsibilities to ensure the welfare of all children, including the need to make referrals to other agencies in some situations.

3 SCOPE

3.1 This policy applies to children under the age of 18 years. In line with the law, this policy defines a child as anyone who has not yet reached their 18th birthday.

3.2 This policy explains how the school will fulfil its safeguarding responsibilities and promote the welfare of children.

3.3. Safeguarding 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
- Taking action to enable children to have the best outcomes

3.4. This policy explains how the school will carry out its child protection responsibilities.

3.5. Child protection is the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

3.6. This policy applies to all adults engaged in any activity at the school, including all permanent, temporary and support staff, Trustees, trainee teachers, volunteers, contractors and external service or activity providers. Within this document the term 'staff' will be used to denote those adults, specified within the previous sentence.

3.7. Students aged 18 and above are supported and given the same level of care and safeguarding provision as the students under 18. s

4 ROLES AND RESPONSIBILITIES

4.1 The Board of Trustees will ensure:

- Compliance with safeguarding legislation.
- Safeguarding policies are reviewed annually.
- Safeguarding is appropriately resourced.
- A DSL and DDSL are appointed.
- A specific Trustee is appointed to take leadership responsibility for safeguarding arrangements.
- Staff and Trustees receive safeguarding training and training for specific safeguarding related roles.
- Appropriate filtering and monitoring systems are in place for the school computer system and internet connection.
- Safer recruitment procedures are followed.
- Safeguarding is a standing governance priority.
- Safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice.

4.2 The School Principal will:

- Promote safeguarding culture.
- Ensure policies are implemented.
- Support the DSL and DDSL.
- Ensure staff training takes place.
- Ensure safeguarding concerns are addressed effectively.
- Ensure concerns about adults' conduct/behaviour are addressed effectively and in line with statutory guidance.

4.3 The DSL will fulfil their role as outlined in Annex B of Keeping Children Safe in Education 2026 and, as such, will:

- Provide safeguarding leadership.
- Ensure the DSL or a DDSL is available during school hours and out of hours when an arranged school activity is taking place, such as a school trip.
- Manage referrals.
- Liaise with other safeguarding agencies and professionals.
- Contribute to safeguarding assessments, including Children's Social Care assessments.
- Attend strategy meetings and conferences.
- Manage safeguarding records.
- Ensure appropriate information sharing.
- Support staff.
- Lead safeguarding training.
- Understand the views of children.
- Support transitions and the transfer of safeguarding records.

4.4 The DDSL will:

- Support the DSL in their role.
- Deputise in the absence of the DSL.

4.5 The Designated Teacher will:

- Champion educational achievement and promote high aspirations for looked-after and previously looked-after children (known in East Sussex as children we care for and children we cared for).
- Act as the school's lead professional and main point of contact for these pupils.

- Oversee and monitor Personal Education Plans.
- Monitor attendance, progress and attainment and ensure appropriate interventions are in place for children we care for and cared for.
- Work collaboratively with social workers, carers, parents, the Virtual School Head and other professionals.
- Ensure staff understand the impact of trauma, attachment and care experience.
- Promote pupil voice and involve children in decisions about their education.
- Support successful transitions between schools and into further education or employment.
- Work closely with the DSL and DDSL to address welfare and safeguarding concerns promptly.

4.6. All staff will:

- Read Part One of KCSIE 2026 in full. School leaders and staff who work directly with children will also read Annex A of KCSIE 2026.
- Complete safeguarding training.
- Know the identity of the DSL and DDSL.
- Understand safeguarding procedures.
- Report concerns immediately.
- Maintain professional curiosity.
- Contribute to safeguarding assessments where requested.
- Understand their safeguarding responsibilities.

5 SUPPORTING CHILDREN

5.1 Our school will support all pupils by:

- Taking a child centred approach to all aspects of our work.
- Providing a preventive curriculum which includes social and emotional aspects of learning.
- Ensuring that safeguarding is included across the curriculum to help children stay safe, recognise when they do not feel safe and identify who they might or can talk to.
- Ensuring a comprehensive response across the curriculum to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly at school and at home.

- Recognising that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- Filtering and monitoring internet use, to safeguard from potentially harmful and inappropriate online material.
- Ensuring that our safeguarding systems are well promoted, easily understood and easily accessible to children.
- Providing pupils with appropriate adults to approach if they are in difficulties and ensuring that when children talk to an adult about a concern they may have, they will always be taken seriously, they will always be supported and kept safe, they will never be given the impression that they are creating a problem or have anything to feel ashamed about.
- Ensuring that our systems of gathering pupil voice capture the full breadth of the pupil demographic, including pupils with SEND and those who are vulnerable or have experienced challenges in their lives, to understand the experience of pupils at the school, so that this can inform the development of safeguarding practice.
- Supporting the child's development in ways that will foster security, confidence, and independence and encourage development of self-esteem and self-assertiveness while not condoning aggression or bullying.
- Liaising and working together with other support services and those agencies involved in safeguarding children.
- Monitoring children who have been identified as having welfare or safeguarding concerns and providing appropriate support.
- Ensuring that all staff are aware of the early help process, and understand their role in it, including acting as the lead professional where appropriate.
- Ensuring that all staff have a clear understanding of the needs of the children they are working with and understand that whilst all children need to be protected, some groups of children are potentially at greater risk of harm through additional vulnerabilities or circumstances.

5.2 Additional vulnerabilities and circumstances can include:

- Looked-after children (known in East Sussex as children we care for)
- Previously looked-after children (known in East Sussex as children we cared for)
- Children who are disabled or have certain health or medical conditions (including allergies) and have specific additional needs

- Children who have special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Children who have a mental health need
- Children who are young carers
- Children who are pregnant and/or are parents themselves.
- Children who have exhibited early signs of abusive, violent, and/or harmful behaviours.
- Children showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Children frequently going missing from education, care or from home
- Children who have been repeatedly removed from the classroom, experienced multiple suspensions, are on a reduced timetable, are at risk of being permanently excluded from the school.
- Children at risk of exploitation, modern slavery, trafficking, sexual exploitation (by an individual or an organised network) or criminal exploitation (including financial exploitation).
- Children at risk of being radicalised into terrorism.
- Children with a parent or carer in custody or who are affected by parental offending
- Children in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- Children misusing drugs or alcohol themselves.
- Children at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- Children who have returned home to their family from care
- Children showing early signs of abuse and/or neglect
- Privately fostered children
- Children or young people who are lesbian, gay, bisexual or questioning their gender or who are perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not)

5.3 Whilst being lesbian, gay, bisexual, or gender questioning, or perceived to be, is not in itself an inherent risk factor for harm, we acknowledge that this group can be targeted by other children. Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open, so as a school we endeavour to reduce any additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. We will follow the guidance in Keeping Children Safe in Education 2026 regarding children who are questioning their gender, including but not limited

to matters relating to social transition requests, understanding children's thoughts and feelings, promoting welfare, working with parents/carers, and discussing constraints.

5.4 Children with special educational needs or disabilities (SEND) or certain health conditions (including allergies) can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect and exploitation in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Being more prone to peer group isolation or bullying/cyberbullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges, including a risk that some children may not understand that what is happening to them is abuse.
- The need for intimate care or that these children are isolated from others.
- That these children are more likely to be dependent on adults for care.
- These children may have issues with cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content and or behaviours in school without understanding the consequences of doing so.

5.5 We understand the additional vulnerabilities for young children, and we follow the guidance for safeguarding children up to the age of five set out in Section 3 of the [Statutory Framework for the Early Years Foundation Stage 2026](#)

5.6 Children who have a social worker due to safeguarding or welfare needs may be vulnerable to further harm due to experiences of adversity and trauma, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and positive mental health. Our school will identify the additional needs of these children and provide extra monitoring and pastoral/academic support to mitigate these additional barriers. We recognise that even when social care intervention has ended, these additional barriers may persist, therefore so too will our additional monitoring and support.

5.7 Staff are aware that mental health problems can, in some cases, develop into safeguarding concerns, including self-harm, suicidal ideation or risk of suicide. Mental health problems can also be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Where it is known that children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can impact on their mental health, behaviour, and education. Our school will identify the additional needs of these children and provide extra monitoring and pastoral support to mitigate these additional barriers. Where necessary, referrals will be made to mental health professionals for further support.

5.8 Our School is part of Sussex Police Operation Encompass and we will support individual children as necessary when we receive a notification of an incident of domestic abuse.

5.9 Children may be susceptible to radicalisation into terrorism. As with protecting children from other forms of harm and abuse, protecting children from this risk forms part of our whole-school approach to safeguarding. The School fulfils its responsibilities under the Prevent Duty through the arrangements set out in [Appendix E: Preventing Radicalisation into Terrorism - The Prevent Duty](#).

5.10 Our school takes a trauma informed approach to supporting children, considering their lived experience, and factoring this into how we can best support them with their welfare and engage them with their learning.

6 THE USE OF RESTRICTIVE INTERVENTIONS INCLUDING THE USE OF REASONABLE FORCE

6.1 There are circumstances in which staff may need to use restrictive interventions, including reasonable force, to safeguard pupils or others. Any intervention will be necessary, reasonable and proportionate and will be used in accordance with the Department for Education guidance Restrictive interventions, including the use of reasonable force, in schools (2026), relevant Local Authority guidance and the arrangements set out in [Appendix F](#) of this policy.

6.2 When managing incidents where restrictive interventions or reasonable force have been used, the School will consider whether to liaise with the LADO where it is thought that the physical intervention may lead to an allegation.

7 PROCEDURE FOR REPORTING AND RESPONDING TO CONCERNS ABOUT CHILDREN

7.1 We have developed a structured procedure in line with Pan-Sussex Child Protection and Safeguarding Procedures and Keeping Children Safe in Education 2026, which will be followed by all members of the school community in cases where there are welfare or safeguarding concerns for a child. This procedure is detailed in [Appendix A](#) of this policy.

7.2 In line with the procedures, the Children's Social Care Single Point of Access (SPoA) will be contacted as soon as there is a significant concern, or where level 3 support is required, or level 2 Early Help Keywork Service support is required for children who are severely absent from school.

7.3 Where a crime may have been committed, the police will be informed as necessary, using the NPCC When to call the police guidance to inform this decision.

7.4 Where police seek to interview a child at school, the School will comply with PACE Code C 2023, including the requirement for an Appropriate Adult where applicable. The fuller operational procedure is set out in [Appendix A](#) of this policy.

7.5 At Michael Hall we have a Safeguarding Team. Posters with photographs and the email address of each team member are displayed around the School in classrooms and on notice boards in communal areas. Through PSHE lessons, classroom visits by the DSL and pupil voice sessions, pupils are made aware of the role of the DSL and Safeguarding Team and how to contact members of the team.

7.6 We will ensure that all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children and act in the best interests of children by publishing the policy and procedures on our website and by referring to them in our introductory school materials.

8 RECORD KEEPING

- 8.1 Accurate and timely record keeping is an important part of the school's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children
- 8.2 All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Information will be kept confidential and stored securely.
- 8.3 Records will 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 the outcome
- 8.4 Records will be factual, accurate, relevant, up to date and auditable. They will support monitoring, risk assessment and planning for children and enable informed and timely decisions about appropriate action to take.
- 8.5 All staff members (including supply staff and trainee teachers), Trustees, volunteers, contractors and activity providers will record and report safeguarding concerns in line with the East Sussex Safeguarding Children Partnership (ESSCP) Keeping Records of Child Protection and Welfare Concerns Guidance. At Michael Hall, we use an encrypted and secure web-based database called CPOMS, to which staff have appropriate access for the purpose of recording concerns about children.
- 8.6 The DSL will ensure that records are maintained accurately for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of this policy, ESCC guidance, and Keeping Children Safe in Education 2026.
- 8.7 The DSL will ensure that files are only accessed by those who need to see them and where files or content are shared, this will happen in line with information sharing advice and guidance.
- 8.8 We will continue to support any pupil leaving the school about whom there have been concerns by ensuring that all appropriate information, including welfare and safeguarding concerns, is forwarded under confidential cover to the pupil's new school as a matter of priority, and within 5 working days.
- 8.9 When a pupil is due to transfer to another school the DSL will consider if it would be appropriate to share any information with the new school or college in advance of the pupil leaving. For example, information (such as children who have or have had a social worker and have been victims of abuse) that would allow the new school or college to put support in place for when the child arrives, ensuring appropriate support is maintained.
- 8.10 When a new pupil joins our school, and there is a record of safeguarding or welfare concerns, we will ensure that this information is shared appropriately with the DSL, the Head of Inclusion and the Designated Teacher, as necessary.

9 THE MANAGEMENT OF SAFEGUARDING

- 9.1 We recognise that safeguarding is not a discrete area of work: there is a safeguarding dimension to almost every area of school practice. As part of our whole school approach, and to ensure a holistic view of all children, we have structures and systems in place, such as scheduled meetings and shared databases, to ensure that the DSL has oversight of areas of school organisation which may not fall directly within their remit but may impact upon effective safeguarding. These areas

include behaviour, attendance, medical needs/first aid, SEND and bullying. Information from these areas will be factored into safeguarding decision making for individual children so that their needs are considered holistically.

- 9.2 We will ensure that the DSL is kept informed of incidents involving restrictive intervention, including reasonable force, and is aware of relevant behaviour or support plans for individual children. The DSL regularly meets with the Head of Inclusion and Pastoral Lead to keep up to date with students' plans. See **Appendix F** of this policy and the Anti-Social Behaviour and Bullying Policy for further information.
- 9.3 We will ensure that the DSL is kept informed of attendance patterns, and where there are concerns for individual children the response to this will be considered within the context of safeguarding. (See [Attendance Policy](#) for further information).
- 9.4 We will ensure that the DSL is kept informed of arrangements for first aid and for children with medical conditions or allergies, and is alerted where a concern arises, such as an error in administering medicine or treatment, repeated medical appointments being missed, or guidance or treatment not being followed by a parent/carer or child. (See First Aid Policy for further information).
- 9.5 Systems are in place to ensure that hate incidents, e.g., racist, homophobic, transphobic gender or disability-based bullying/cyberbullying, are reported, recorded and considered under safeguarding arrangements by the DSL. (See [Anti-Social Behaviour and Bullying Policy](#) and [Online Safety Policy](#) for further information).
- 9.6 The DSL links with curriculum leads, such as PSHE and ICT, to ensure that the curriculum supports the wellbeing and resilience of pupils and teaches them about risk assessment and safeguarding issues, such as healthy relationships and online safety. (See RSE and Health Education Policy and Online Safety Policy for further information).

10 SAFER WORKFORCE AND MANAGING CONCERNS AND ALLEGATIONS ABOUT ADULTS

- 10.1 Our school operates robust safer recruitment procedures to help prevent unsuitable individuals from working with children, in accordance with Part Three of Keeping Children Safe in Education 2026 and Section Three of the Early Years Foundation Stage Statutory Framework 2026. **Please see the Employee Handbook for further details. (needs hyper link)**
- 10.2 All individuals working in any capacity at our school will be subjected to safeguarding and pre-employment checks in line with statutory guidance. This includes identity verification, enhanced DBS checks (and barred list checks where appropriate), prohibition checks, and ongoing safeguarding vigilance.
- 10.3 We will ensure that agencies and third parties supplying staff provide written confirmation that appropriate safeguarding checks have been completed. The school will verify the identity of all agency workers on arrival.
- 10.4 Professional visitors, such as Educational Psychologists, Social Workers, or Local Authority Officers, will be expected to provide a professional proof of identity. Where necessary, further safeguarding assurances will be sought from their employer.
- 10.5 External organisations and speakers will be subject to appropriate vetting and risk assessment, including consideration of:
- Educational value

- Age appropriateness
- Safeguarding assurances and DBS requirements

- 10.6 Parents or other relatives of children or other visitors attending activities such as a parents' evening or sports day will not be expected to provide any DBS or barred list checks. The Principal and DSL will decide case by case or event by event the level of supervision, if any, required for such persons.
- 10.7 All job descriptions and person specifications will clearly set out safeguarding responsibilities.
- 10.8 We will ensure that at least one member of every interview panel has completed up-to-date safer recruitment training.
- 10.9 The Principal and DSL are responsible for ensuring that our single central record is accurate and up to date.

Managing allegations, low-level concerns and professional boundaries

10.10 The School will manage all concerns and allegations about adults working in or on behalf of the School in accordance with Part Four of Keeping Children Safe in Education 2026, the Pan-Sussex Child Protection and Safeguarding Procedures and [Appendix C](#) of this policy.

10.11 All concerns about an adult's conduct or behaviour, however small or uncertain, must be shared promptly. Low-level concerns will be reported to the Principal, who is the case manager for concerns about adults. If a concern is first shared with the DSL, it will be passed promptly to the Principal. Concerns about the Principal must be reported to the Chair of Trustees. Where information also raises a concern about a child's safety or wellbeing, the DSL must be informed immediately and the child-protection procedure followed. Adults are encouraged to self-report where their own conduct may have been misinterpreted or may have crossed a professional boundary.

10.12 Where a concern may meet the harm threshold, or where there is doubt about the appropriate threshold, the Principal will consult the Local Authority Designated Officer (LADO) without delay. The School will not undertake an internal safeguarding investigation before appropriate external advice is received, although limited initial fact-finding may be necessary to determine the correct route.

10.13 The detailed procedure for managing allegations, low-level concerns and professional boundaries is set out in [Appendix C](#). The operational flowchart is in [Appendix D](#) and the Low-Level Concern Reporting Form is in [Appendix G](#).

11 STAFF INDUCTION, TRAINING AND DEVELOPMENT

- 11.1 All new members of staff, including newly qualified teachers and teaching assistants, will be given an induction which includes the following:
- Issue and explain the safeguarding and child protection policy
 - Issue and explain the behaviour policy
 - Issue and explain the staff behaviour policy/code of conduct

- Issue and explain the policy/guidance which includes the safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods.
- Explain the role of the DSL and share the identities of the DSL and all DDSLs
- Issue Part One of Keeping Children Safe in Education 2026 to all new members of staff. School leaders and staff who work directly with children will also read Annex A of KCSIE 2026.
- Explain professional boundaries, low-level concerns, self-reporting and the reporting routes for concerns about adults, including the Principal and Chair of Trustees routes.
- Child protection and safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring).
- All new members of staff are expected to read the above-mentioned documents and to sign an acknowledgement of this.

11.2 The safeguarding induction and ongoing safeguarding training of staff will be integrated into and aligned with the whole-school safeguarding approach, wider staff training and curriculum planning. It will include:

- Staff understand that low-level concerns are not insignificant; concerns should be reported rather than investigated by staff; self-reporting is encouraged; and patterns of adult behaviour are important safeguarding information.
- Staff understand the difference between a safeguarding concern and a child in immediate danger or at risk of significant harm.
- Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Staff understand that children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.
- Staff understand that children who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour and positive mental health and that these barriers may persist even when the social care intervention ceases.
- Staff understand that mental health issues for children may be an indicator of harm or abuse, or where it is known that a child has suffered harm or abuse this may impact on their mental health, behaviour and education.
- Staff understand that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation (including financial exploitation), sexual abuse, serious youth violence (including physical assault, carrying, threatening with, or using weapons), and county lines.
- Staff understand that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently via online channels and in daily life. Children can also abuse other children online. This can take the form of abusive, harassing, and misogynistic and misandrist messages, the sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

- Staff understand that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school and online.
- Staff understand that even if there are no reports in the schools of child-on-child abuse it does not mean it is not happening, it may be the case that it is just not being reported.
- Staff understand the importance of challenging inappropriate behaviours between peers, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter,” “just having a laugh,” “part of growing up,” or “boys being boys,” can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst-case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- Staff know how to respond to a child who makes a disclosure of abuse or harm.
- If staff are unsure, they should always speak to the DSL or DDSL.
- If staff have any concerns about a child’s welfare, they should act on them immediately.
- Staff should not assume a colleague or another professional will take action.
- The DSL or DDSL should always be available to discuss safeguarding concerns. If in exceptional circumstances the DSL and DDSL are not available this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from SPoA. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.
- Teaching staff in all subject areas understand that there will be numerous opportunities, planned and unplanned, to reference, reinforce or develop aspects of the safeguarding agenda within their lessons such as online safety, healthy relationships, challenging hate or prejudice and critical thinking.

- 11.3 The DSL will undergo updated safeguarding and child protection training every two years. In addition to this their knowledge and skills will be updated regularly, and at least annually, to keep up with developments relevant to the role.
- 11.4 All staff members of the school will receive appropriate safeguarding and child protection training (whole-school training) annually. The DSL will provide ongoing briefings to the school on any changes to safeguarding and child protection legislation and procedures and relevant learning from local and national serious practice reviews as required, throughout the year.
- 11.5 Staff members who miss whole school training will be required to undertake other relevant training to make up for it, e.g., by joining another school’s whole-school training or receiving 1:1 training from the DSL. The DSL will be responsible for arranging this.
- 11.6 The nominated Trustee for safeguarding and child protection will attend Governor Services training prior to or soon after appointment to the role; this training will be updated every two years.
- 11.7 We will ensure that staff members provided by other agencies and third parties, e.g., supply teachers and contractors, have received appropriate safeguarding and child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the school.
- 11.8 On the first occasion which staff members provided by other agencies and third parties, e.g., supply teachers and contractors come to our school to work; they will be provided with our Michael Hall ‘Important Information’ booklet which contains details of the safeguarding

arrangements at our school, including identifying the DSL and the process for reporting welfare concerns.

11.9 The School will maintain accurate records of staff induction and training.

12 CONFIDENTIALITY, CONSENT AND INFORMATION SHARING

12.1 We recognise that all matters relating to safeguarding and child protection are confidential and we will always be clear about the purpose of sharing confidential information and only share as much as we need to achieve the purpose.

12.2 All staff members are aware that they cannot promise a child they will keep secrets which might compromise the child's safety or wellbeing.

12.3 The Principal or the DSL will disclose information about a pupil to other members of staff on a need-to-know basis, and in the best interests of the child.

12.4 All staff members have a professional responsibility to share information with other practitioners and agencies in order to safeguard children and will be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children.

12.5 When deciding what information to share staff will consider:

- The relevancy of the information, including the current safeguarding risk.
- What is necessary for the practitioner, agency, or receiving setting to know.
- Whether it is clearly presented and appropriately contextualised.

12.6 The school may have to share information about parents or carers, such as their medical history, disability, or substance misuse issues, for investigations of child abuse carried out by Children's Social Care.

12.7 We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.

12.8 The Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025, together referred to here as the 'data protection laws', do not prevent the sharing of information for the purpose of keeping children safe and fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. The data protection laws are there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.

12.9 We should be sharing any concerns we have with parents at an early stage unless this would put a child at greater risk or compromise an investigation. Parents need to know what our

responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.

12.10 We will try to get consent from parents (or the child, if they have sufficient understanding) to share information, if possible. However, we do not need consent if we have concerns about a child's safety and well-being. If we decide to share information without consent, we will record this with a full explanation of the decision.

12.11 Consent will not be sought from parents or carers (or the child, if they have sufficient understanding), if:

- It would place a child at increased risk of harm.
- It would place an adult at risk of serious harm.
- It would prejudice a criminal investigation.
- It would lead to unjustified delay in making enquiries about reports of significant harm to a child.
- Required by law or a court order to share information.

12.12 Consent is not necessary in cases where Children's Social Care are making child protection enquiries under Section 47 of the Children Act 1989.

12.13 Consent is necessary, for:

- Children's Social Care investigations or assessments of concerns under Section 17 of the Children Act 1989. Children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in the Duty and Assessment Team (DAT).
- Early help (level 3) referrals and assessments. Assessments are undertaken with the agreement of the child and their parents or carers.
- Referrals to the Team Around the Family (TAF) Coordinator. Referrals must be made with the consent of the child and their parents or carers.

12.14 Where there is any doubt about the need for seeking consent, advice will be sought from the DSL or from the Children's Social Care SPoA.

12.15 A record will be made of the decision to share information, with or without consent, and the reasons for it. Equally a record will be made of any decision not to share information including the reason for this.

12.16 All our staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

12.17 We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

13 INTER-AGENCY WORKING

- 13.1 We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the Police, and Children's Social Care.
- 13.2 We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.
- 13.3 We will participate in safeguarding practice reviews, other reviews and file audits as and when required to do so by the ESSCP. We will ensure that we have a clear process for gathering the evidence required for reviews and audits, embedding recommendations into practice, and completing required actions within agreed timescales.

14 PROFESSIONAL CHALLENGE AND DISAGREEMENTS

14.1 Working with children and families, and in particular child protection work, is stressful and complex, as well as involving uncertainty and strong feelings. To ensure that the best decisions are made for children, we need to be able to challenge one another's practice.

14.2 We will promote a culture within our School that enables all staff members to raise, without fear of repercussions, any concerns they may have about the management of safeguarding in the School. This may include raising concerns about decisions, action and inaction by colleagues about individual children. If necessary, staff members will speak with the DSL, the Principal or the Chair of Trustees.

14.3 Cooperation across agencies is crucial; professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, conferences, and case management.

14.4 If there are any professional disagreements with practitioners from other agencies, the DSL or the Principal will raise concerns with the relevant agency's safeguarding lead in line with Section 5.2.2 [Resolving Professional Differences](#) guidance in the Pan-Sussex Child Protection and Safeguarding Procedures.

14.5 If the school disagrees with the child protection conference chair's decision, the DSL or the Principal will consider whether they wish to challenge it further and raise the matter with Children's Services Head of Safeguarding.

15 CONTRACTORS, SERVICE AND ACTIVITY PROVIDERS AND WORK PLACEMENT PROVIDERS

15.1 We will ensure that contractors and providers are aware of our school safeguarding and child protection policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns.

15.2 We will seek written confirmation that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding check in line with Keeping Children Safe in Education: September 2026. If assurance is not obtained, permission to work with our children or use our school premises may be refused.

15.3 When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

15.4 When sending pupils on a work placement, as part of work experience, we will seek reassurances about their policies and procedures to protect children from harm, as outlined in Keeping Children Safe in Education 2026. We will ensure relevant checks are completed for any children over the age of 16 years who will be engaging in regulated work, where appropriate, in line with Keeping Children Safe in Education 2026.

16 SITE SECURITY

16.1 The school site is surrounded by a continuous perimeter fence/wall to reduce the risk of unauthorised access/egress. Additionally, we have a site security risk assessment in place.

16.2 All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.

16.3 Reception is notified in advance of all expected visitors and volunteers. A visitor's form is filled out prior to their arrival, and they are asked to show identification on arrival. All visitors are

expected to report to the Reception on entry, sign in and out in the office visitors' log and to display a visitor's badge while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance. Blue lanyards are issued to those with DBS checks and red lanyards are issued to visitors who must be accompanied at all times whilst on site, for example prospective parents on a tour of the School. All visitors are issued with an 'Important Information' leaflet which explains our Safeguarding protocols.

- 16.4 The School will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

17 USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

- 17.1 When we 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) we always ensure that appropriate arrangements are in place to keep children safe.
- 17.2 When the services or activities being provided are under the direct supervision or management of the School, then arrangements for child protection outlined within this policy will apply.
- 17.3 Where services or activities are being provided separately by another body this will not necessarily be the case. The School will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) and that they follow the safeguarding arrangements in Keeping Children Safe in out-of-school Settings; and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.
- 17.4 The School 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 the premises; and that failure to comply with this would lead to termination of the agreement.

The School does not let or hire out any area of the premises during school hours.

18 WHISTLEBLOWING AND COMPLAINTS

18.1 We will ensure that all staff members are aware of their duty to raise concerns about the management of safeguarding and child protection, including concerns about the conduct, behaviour or professional boundaries of colleagues. Low-level concerns should be reported to the Principal; concerns about the Principal should be reported to the Chair of Trustees. If staff do not feel able to raise a concern through the normal management route, they should use the School's whistleblowing arrangements and may contact the NSPCC Whistleblowing Advice Line. The detailed procedure is in [Appendix C](#), the flowchart is in [Appendix D](#) and the Low-Level Concern Reporting Form is in [Appendix E](#). Please see Whistleblowing Policy (hyper Link missing)

18.2 We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice. This is outlined in our Complaints Policy.

19 QUALITY ASSURANCE

- 19.1 We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of welfare concern and safeguarding files and records by the DSL.

- 19.2 We will complete a self-assessment audit of the school's safeguarding arrangements at least annually (as specified by the ESSCP). The East Sussex Education Division provides an audit tool for this purpose which schools can use.
- 19.3 The School's senior management and the Board of Trustees will ensure that action is taken to remedy without delay any areas for development identified in safeguarding and child protection arrangements.

20 THE LEGAL FRAMEWORK

- 20.1 Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the School are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school. Section 157 of the same Act places a similar duty on non-maintained and independent educational establishments, including free schools and academies.
- 20.2 Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools, academies, and early years providers, are required to cooperate with the local authority to improve the well-being of children in the local authority area.
- 20.3 Under section 14B of the Children Act 2004, the East Sussex Safeguarding Children Partnership (ESSCP) can require a school, college, or early years provider to supply information in order to perform its functions. This must be complied with.
- 20.4 Under section 40 of the Childcare Act 2006, early years providers registered on the Early Years Register and schools providing early years childcare must comply with the welfare requirements of the Early Years Foundation Stage.
- 20.5 This policy and the accompanying procedures have been developed in accordance with the following statutory guidance and local safeguarding procedures:
- [Working Together to Safeguard Children 2026 statutory guidance, March 2026](#)
 - [Keeping Children Safe in Education statutory guidance for schools and colleges, September 2026](#)
 - [Pan-Sussex Child Protection and Safeguarding Procedures](#)
 - [Information Sharing advice for practitioners providing safeguarding services for children, young people, parents and carers, May 2024](#)
 - [What to do if you're worried a child is being abused, March 2015](#)
 - [Early Years Foundation Stage statutory framework for group and school-based providers, September 2026](#)

21 POLICY REVIEW

- 21.1 This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with that policy review cycle.

21.2 The DSL will ensure that staff members are made aware of any amendments to policies and procedures.

22 LINKED POLICIES AND PROCEDURES

22.1

- [Anti-Social Behaviour and Bullying Policy](#)
- [Attendance Policy](#) (including Children Missing from Education Procedures)
- [Complaints Policy](#)
- [Drugs, Alcohol and Substance Misuse](#)
- [Equality Information and Objectives Statement](#)
- Employee Handbook
- [First Aid Policy](#)
- [Health and Safety](#)
- [Radio Frequency and Radiation Policy](#)
- [Online Safety Policy](#)
- [Positive Relationships Policy](#)
- [RSE and Health Education Policy](#)
- [SEND policy](#)
- Staff Code of Conduct
- [Supporting Students with Medical Needs Health and Safety Policy](#)

APPENDIX A

PROCEDURE FOR REPORTING AND RESPONDING TO CONCERNS ABOUT CHILDREN

1. RECOGNITION - WHAT TO LOOK FOR

1.1 Staff members will understand what abuse, neglect, and exploitation are having read Part One of Keeping Children Safe in Education 2026. School leaders and staff who work directly with children will also read Annex A of KCSIE 2026. They will look for indicators of abuse, neglect, and exploitation and should refer to the detailed information about the categories of abuse and risk indicators in the Sussex Child Protection Procedures for further guidance.

1.2 In an abusive relationship, the child may:

- appear frightened of their parent(s)
- act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups
- however, they may also not exhibit any signs of stress or fear

1.3 In an abusive relationship, the parent or carer may:

- persistently avoid child health services and treatment of the child's illnesses
- have unrealistic expectations of the child
- frequently complain about or to the child and fail to provide attention or praise
- be absent
- be misusing substances
- persistently refuse to allow access on home visits by professionals
- be involved in domestic violence and abuse
- be socially isolated

1.4 Serious case reviews, now known as safeguarding practice reviews, have found that parental substance misuse, domestic abuse, and mental health problems, if they coexist in a family, could mean significant risks to children. Problems can be compounded by poverty, frequent house moves or eviction.

2. SAFEGUARDING CHILDREN CONTINUUM OF NEED

2.1 The Safeguarding Children Continuum of Need has been developed so that everyone working with children in East Sussex has a common language for understanding the needs and risks surrounding children and their families. It is important that all members of staff are familiar with it.

2.2 The Continuum of Need shows that a child's or family's additional needs can be on a range from one to four, and that needs can move between levels. The Continuum of Need will be used by

practitioners to identify the right level of support for the child in the least intrusive way while keeping the child safe.

The Continuum of Need is accessible on the East Sussex County Council website.

- 2.3 When assessing cases of possible neglect, the ESCC Neglect Matrix will be used. This tool mirrors the Continuum of Need, but with greater focus upon potential indicators of neglect mapped across each of the four levels of need.

3. WHAT ACTION TO TAKE IF YOU HAVE CONCERNS ABOUT A CHILD

- 3.1 When concerned about the welfare or safety of a child, staff should always act immediately and in the best interests of the child.
- 3.2 Staff should always speak to the DSL or DDSL about any concern with a child and should never assume a colleague, or another professional will take action.
- 3.3 The DSL or DDSL should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from SPoA. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible. At Michael Hall, staff record safeguarding concerns on CPOMS and inform the DSL or DDSL promptly.
- 3.4 In line with Pan-Sussex Child Protection and Safeguarding Procedures and Keeping Children Safe in Education 2026, we will consider:
- Providing community-based early help, which may involve managing support for the child internally through our own pastoral support processes, where doing so does not place the child at additional risk.
 - Seeking out support in the community and signposting families to support, making use of [East Sussex 1 Space](#) and [East Sussex Family Hubs](#).
 - Seeking advice or further signposting from the [ESCC Consultation Advice Line](#).
 - Engaging with the [Team Around the Family process](#) to coordinate support for the family.
 - Where targeted Early Help (under sections 10 & 11 of the Children Act 2004) may be required we will make a referral to SPoA.
 - If a concern is at level 4 of The Continuum of Need, we will make a referral to [SPoA](#).
 - Children's Social Care will consider whether this may be a Child in Need (Section 17 Children Act 1989) or Child Protection (Section 47 Children Act 1989). Further intervention to accommodate or remove a child from their home may be considered under sections 20 and 31 Children Act 1989.
 - Informing the police where a crime may have been committed, using the NPCC When to call the police guidance to inform this decision. Where police seek to interview a child at school about their suspected involvement in a criminal offence, the School will have regard to PACE Code C 2023. A child must not normally be interviewed without an

Appropriate Adult present, and an interview at school should take place only in exceptional circumstances and with the agreement of the Principal or their nominee.

APPENDIX B

CHILD-ON-CHILD ABUSE (INCLUDING HARASSMENT AND VIOLENCE)

At this school we take a zero-tolerance approach to child-on-child abuse (including harassment, violence, bullying, harmful sexual behaviour, sexual harassment, and sexual violence), recognising that all child-on-child abuse is unacceptable and will be taken seriously.

- 1.1 Throughout this appendix reference will be made to the terms perpetrator and victim. These terms appear within DfE guidance such as Keeping Children Safe in Education and are easily understood. These terms are being used within this document to aid the flow of sentences however when discussing incidents of child-on-child abuse with children, parents, or carers the term perpetrator will be replaced with 'child who has displayed X behaviour' and victim will be replaced with 'child who has experienced X behaviour'.
- 1.2 All staff will be aware that children can abuse other children and that it can happen both inside and outside of school and online.
- 1.3 Staff understand that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator and they will provide support and intervention to both children.
- 1.4 Staff will recognise that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys perpetrators.
- 1.5 It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
- 1.6 Child-on-child abuse is most likely to include, but may not be limited to:
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying).
 - discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents.
 - abuse in intimate personal relationships between children (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking).
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens, and/or encourages physical abuse).
 - 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, and may be standalone or part of a broader pattern of abuse.
 - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens, and/or encourages sexual violence).
 - consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI.

- 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 offence), 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.
- initiation and hazing type violence and rituals.

1.7 All staff understand the importance of challenging inappropriate behaviours between children that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, misogyny and an unsafe environment for children and, in worst-case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

1.8 All staff understand 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 will act on them immediately rather than wait to be told.

1.9 The initial response to a report of child-on-child abuse from a child is incredibly important. How we respond to a report can encourage or undermine the confidence of future victims of child-on-child abuse to report or come forward.

1.10 Staff understand that an initial report to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

1.11 Staff will be mindful that certain children may face additional barriers to telling someone. This could be for many different reasons including, but not limited to, their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

1.12 All staff will reassure victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

1.13 All staff understand that even if there are no reports in the school of child-on-child abuse it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important for staff to speak with the DSL or a DDSL if they have any concerns regarding child-on-child abuse.

1.14 If a report of child-on-child abuse is made:

- Staff will record the report on CPOMS and inform the DSL or DDSL promptly.

- The DSL will assess the information and identify appropriate outcomes to the incident, which may include school-based support or interventions, support from universal services and community-based early help, or referrals to other agencies, as necessary, such as to Family Help, CAMHS and the police (if the report involves a potential criminal offence).
- Where it is necessary to contact the police, we will explain to those children involved that the law is in place to protect children and young people rather than to necessarily criminalise them, and this will be explained in such a way that avoids alarming or distressing them.
- When responding to a report of child-on-child abuse the wishes of the victim, in terms of how they want to proceed, will be taken into account. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- A risk assessment will be completed and where necessary a written support plan created for all children involved, including the child or children who have experienced the abusive behaviour and the child or children who is reported to have displayed the abusive behaviour as well as any others affected, with a named person they can all talk to if needed.
- Any risk assessment will give consideration to potential intra-familial harms and any necessary support for siblings.
- Where an incident has occurred within the school then the time and location will be identified, and a risk assessment completed to make the location safer.
- Risk assessments and support plans will be completed in conjunction with parents or carers, the child (depending on their age) and with support from any other agencies involved such as Children's Social Care or the police.
- The format of any support plan will vary with the exact nature of the incident but will always be in line with processes outlined in the Positive Relationships Policy and the Anti-Social Behaviour and Bullying Policy.
- If the incident involves a Harmful Sexual Behaviour (HSB) then the guidance in the [East Sussex Protocol for Managing Peer on Peer Harmful Sexual Behaviour in Schools](#) will be followed and a Safeguarding Risk Reduction Plan created accordingly.
- Incidents involving consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, including where generated by AI, will require a safeguarding response and will be managed in line with guidance in Sharing nudes and semi-nudes: advice for education settings working with children and young people.
- Any risk assessments and support plans devised will be shared with staff within the school, as necessary, to ensure that staff are aware of the additional measures in place to safeguard those children.
- Alongside actions to provide protection and support to both victims and perpetrators of child-on-child abuse, where appropriate, they may also need to be managed through the Positive Relationships Policy and the Anti-Social Behaviour and Bullying Policy.

- All incidents of child-on-child abuse will be categorised and recorded by the nature of the incident i.e., bullying (including the type such as cyber, racial, biphobic, transphobic and homophobic etc), physical abuse (identifying the specifics: hitting, kicking, etc) or a Harmful Sexual Behaviour or other specifics such as sharing of nudes and semi-nudes or whether the incident was potentially criminal.

1.15 The school will minimise the risk of child-on-child abuse by:

- Challenging behaviours, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Addressing any inappropriate behaviour (even if it appears to be relatively innocuous) is an important intervention that helps prevent problematic, abusive, and/or violent behaviour in the future.
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending nudes or semi-nude images.
- Being vigilant to issues that particularly affect different genders - for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys, whilst at the same time recognising that any of these issues can affect any pupils regardless of their gender.
- Ensuring our whole school approach to safeguarding and preventive curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils are aware of the different ways in which they can speak with a trusted adult in the School, either directly or through the anonymous posting boxes and the dedicated Student Concerns email address, which are monitored by key staff in the safeguarding team.
- Ensuring pupils are aware of the different ways in which they can speak with an adult outside of the school through agencies such as Child Line or the NSPCC.
- Ensuring that staff are aware of child-on-child abuse and maintain an attitude of 'it could happen here', as they do with all areas of safeguarding.
- Ensuring that staff are trained to understand that a child harming another child could be a sign that the child is being abused themselves.

APPENDIX C: MANAGING ALLEGATIONS, LOW-LEVEL CONCERNS AND PROFESSIONAL BOUNDARIES

1. STATEMENT OF INTENT

At Michael Hall Waldorf School, safeguarding is everyone's responsibility. We are committed to creating a safe, supportive and nurturing environment in which every child is protected, seen, valued and able to thrive.

Safeguarding is inseparable from the quality of relationships, professional practice and culture within the School. Our relational approach, continuity of relationships and commitment to the whole child are strengths of our community; they must always operate within clear professional boundaries and the safeguarding responsibilities of adults.

Michael Hall therefore promotes openness, professional curiosity, respectful challenge and a willingness to speak up when something does not feel right. Reporting a low-level concern is a safeguarding action. It does not, by itself, mean that misconduct has occurred.

The purpose of this appendix is to enable concerns to be identified and shared early, considered fairly and in context, responded to proportionately, and reviewed for patterns so that children are protected and adults are supported to maintain safe professional practice.

At a glance: Notice it → Share it → Record it → Assess it → Respond proportionately → Review patterns. A low-level concern is not insignificant and is not an accusation. Adults should not investigate concerns themselves. If there is any doubt that the harm threshold may be met, the LADO must be consulted.

2. RELATIONSHIP TO THE CHILD PROTECTION AND SAFEGUARDING POLICY

This appendix forms part of the School's Child Protection and Safeguarding Policy. The main policy remains the overarching safeguarding policy and this appendix provides the detailed procedure for concerns about adults, including professional-boundary concerns and low-level concerns.

Where a concern may meet the harm threshold, appears to involve possible abuse or a criminal offence, indicates that a child may be at immediate risk, or there is uncertainty about the appropriate threshold, the School will follow the main Child Protection and Safeguarding Policy and LADO arrangements without delay.

Important: a concern must never be kept within the low-level concerns process merely because it was initially described as "low level". Threshold decisions can change as information becomes available.

3. SCOPE

This appendix applies to all adults who work in or on behalf of Michael Hall Waldorf School, whether paid or unpaid, permanent or temporary. This includes employees, teachers, Early Childhood practitioners, visiting teachers, supply staff, volunteers, contractors, agency staff, peripatetic staff, Trustees and adults providing services or activities on School premises.

For the purposes of this appendix, "adult" includes any person working in or on behalf of the School. "Child" means any person under the age of 18.

4. STATUTORY AND POLICY FRAMEWORK

This appendix should be read alongside Part Four of Keeping Children Safe in Education 2026, the Pan-Sussex Child Protection and Safeguarding Procedures, East Sussex LADO arrangements, and the School's Staff Code of Conduct, Employee Handbook/HR procedures, whistleblowing arrangements and data-protection arrangements.

5. DEFINITIONS AND SAFEGUARDING THRESHOLDS

5.1 Low-level concern

A low-level concern is any concern, no matter how small and even if it amounts only to 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 or expected professional boundaries, including inappropriate conduct outside work, but which does not meet the harm threshold or is otherwise not considered serious enough for a LADO referral at that time.

The term "low-level" does not mean insignificant. Low-level behaviour exists on a spectrum. It may be inadvertent, thoughtless, poorly judged, misunderstood in context or inappropriate. Apparently minor incidents may also form part of a pattern that becomes significantly more concerning.

5.2 Harm threshold

A concern is no longer low-level where there is reason to believe that an adult has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children, including relevant behaviour outside the School.

If there is any doubt about whether the harm threshold may be met, the Principal will consult the LADO. Where the threshold may be met, no internal safeguarding investigation will be undertaken before appropriate external advice is received.

6. MICHAEL HALL SCHOOL ETHOS AND SAFEGUARDING CULTURE

Michael Hall Waldorf School seeks to nurture the whole child through a balanced, high-quality education and a strong, supportive community. The School's values of Purpose, Balance, Connection and Imagination recognise the importance of meaningful relationships, personal development, creativity and belonging.

Those values are strengthened by clear safeguarding boundaries. Warmth, continuity, care and trust must never create ambiguity about the distinct responsibilities of adults and children. Adults hold positions of trust, authority and influence and must remain conscious of the inherent power imbalance in adult-child relationships.

A close community can make it difficult to raise a concern about a colleague. Professional loyalty must never prevent appropriate safeguarding action. Staff are expected to maintain a culture of vigilance in which concerns are shared responsibly and with the right person, without gossip, assumption or informal investigation.

Michael Hall principle: Connection is safest when boundaries are clear. Speaking up early protects children, supports colleagues and strengthens the culture of the School.

7. PROFESSIONAL BOUNDARIES AND EXAMPLES OF LOW-LEVEL CONCERNS

Adults are expected to understand and follow the Staff Code of Conduct and relevant School procedures. Behaviour should always be considered in context, but examples of matters that may constitute a low-level concern include:

- being overly friendly or familiar with a child in a way that blurs professional boundaries;
- having favourites, or behaviour that could reasonably be perceived as favouritism;
- taking photographs of children on a personal mobile phone or device contrary to School policy;
- communicating with pupils through personal social media, messaging or other non-approved channels;
- engaging with a child one-to-one in a secluded area or behind a closed door without appropriate reason, visibility or safeguards;
- using inappropriate sexualised, intimidating, humiliating, discriminatory or offensive language;
- sharing inappropriate personal information with a pupil or inviting a level of emotional intimacy that is inconsistent with the adult's professional role;
- giving gifts, using terms of endearment, or creating special arrangements in ways that may compromise or appear to compromise professional boundaries;
- unnecessary secrecy around contact with a child; or
- conduct outside the School that raises a safeguarding or suitability concern.

Context matters. Some close interaction may be an appropriate and necessary part of Early Childhood care, first aid, teaching, practical or artistic work, performances, educational visits, pastoral support, additional-needs provision or other authorised School activity. A legitimate educational or care context does not remove the need for professional boundaries, transparency, appropriate supervision and adherence to policy.

Where any adult is uncertain whether conduct is appropriate, they should seek advice from the Principal or DSL rather than relying on assumptions or local custom.

8. ROLES AND RESPONSIBILITIES

8.1 Board of Trustees

- ensure appropriate procedures exist for concerns and allegations about adults;
- ensure safeguarding arrangements are embedded in the ethos and day-to-day life of the School;
- ensure the School has an effective Staff Code of Conduct and appropriate training;
- provide oversight of patterns, themes and organisational learning without compromising confidentiality; and
- ensure concerns about the Principal are managed through the appropriate governance route.

8.2 Principal

- act as the case manager for concerns and allegations about adults, subject to the main Child Protection and Safeguarding Policy;
- receive low-level concerns and self-reports, assess the appropriate threshold and ensure decisions are recorded;
- consult the DSL and LADO as appropriate, especially where the threshold is uncertain;
- ensure concerns are addressed in a fair, child-centred and proportionate way;
- ensure patterns are reviewed and that learning informs policy, training, supervision and culture; and

- ensure HR advice is obtained where employment or conduct action may be required.

8.3 Designated Safeguarding Lead (DSL)

- support a strong whole-school safeguarding culture and advise on safeguarding implications;
- ensure child-welfare concerns arising from an adult-conduct concern are addressed through the main Child Protection and Safeguarding Policy;
- support appropriate record keeping, information sharing and review of patterns; and
- ensure any low-level concern first shared with the DSL is passed promptly to the Principal, unless the concern is about the Principal.

8.4 All adults working in or on behalf of the School

- read and follow the Staff Code of Conduct and safeguarding policies;
- maintain clear professional boundaries;
- report concerns promptly, including concerns that appear small or uncertain;
- self-report where their own conduct could have been misinterpreted or fallen below expected standards;
- avoid investigating concerns themselves or discussing them beyond those who need to know; and
- co-operate with any appropriate safeguarding, HR or disciplinary process.

9. REPORTING CONCERNS

All concerns about the behaviour of an adult working in or on behalf of the School must be shared promptly. Staff do not need to prove that something is wrong before reporting it.

9.1 Normal reporting route

Low-level concerns should be shared with the Principal as soon as possible. If a concern is first shared with the DSL, the DSL will ensure it is passed promptly to the Principal for threshold assessment and management. The Low-Level Concern Reporting Form in **Appendix G** may be used to record the concern.

9.2 Concern about the Principal

Where the concern relates to the Principal, it must be reported to the Chair of Trustees. If the Chair is unavailable, the concern should be reported through the alternative governance or whistleblowing route set out in the main policy.

9.3 Immediate risk or clear disclosure of harm

Where information suggests that a child is at immediate risk of harm or there has been a clear disclosure of abuse, staff must contact the DSL immediately and follow the main Child Protection and Safeguarding Policy. Emergency services and/or Children's Social Care should be contacted where required by that policy and local procedures.

9.4 Supply staff, contractors and externally employed adults

Where a low-level concern relates to supply staff, contractors or another externally employed adult, the School will also notify the employer or agency so that potential patterns of behaviour can be identified and appropriate action taken.

9.5 Whistleblowing

Any adult who does not feel able to raise a concern through the normal management route should follow the School's whistleblowing arrangements ([HYPER LINK NEEDED](#)) and the safeguarding escalation routes in the main policy.

10. SELF-REPORTING AND REFLECTIVE PRACTICE

Michael Hall actively encourages self-reporting. An adult should speak to the Principal where they recognise that something they have said or done:

- could have been misinterpreted;
- could appear compromising to another person;
- crossed or risked crossing an expected professional boundary; or
- on reflection, fell below the standards set out in the Staff Code of Conduct.

Self-reporting demonstrates professional awareness and responsible safeguarding practice. It does not automatically imply wrongdoing and will not, by itself, lead to disciplinary action. Any resulting concern will nevertheless be assessed fairly and consistently on its facts.

11. INITIAL ASSESSMENT AND EVALUATION

The Principal will make an initial threshold assessment promptly. The purpose is to establish enough information to determine the appropriate safeguarding route, not to prejudge the matter.

Where appropriate, and where doing so would not interfere with external safeguarding advice, the Principal may:

- speak with the person who raised the concern to clarify what was seen, heard, said or experienced;
- consider relevant context and available records;
- speak with the adult about whom the concern has been raised and provide an opportunity to respond;
- speak with relevant witnesses where necessary and proportionate;
- consider the concern alongside any previous low-level concerns about the same adult; and
- consult the DSL, HR and/or LADO as appropriate.

Threshold safeguard: If information suggests the harm threshold may be met, fact-finding must stop at the point necessary to preserve the safeguarding process and the LADO should be consulted before any further internal investigation.

12. RESPONDING TO CONCERNS

The School will respond in a child-centred, fair, transparent and proportionate manner.

12.1 No safeguarding or conduct concern identified

Where behaviour is found to be consistent with the Staff Code of Conduct and expected professional practice, the rationale will be recorded. Where useful, the Principal may offer clarification, advice or wider learning to reduce the risk of future misunderstanding. The person who raised the concern should be responded to in a way that does not discourage future reporting.

12.2 Low-level concern

Where the concern is low-level, the School will record it and respond proportionately. Depending on circumstances, actions may include:

- a reflective and non-accusatory professional discussion;
- clarification of the expected standard or professional boundary;

- rereading relevant policies or the Staff Code of Conduct;
- guidance, mentoring, supervision or additional training;
- an agreed professional-boundaries or action plan;
- closer management oversight for a defined period; and
- review for recurrence, escalation or patterns.

A single low-level concern does not automatically result in disciplinary action. However, the underlying conduct may justify formal employment action, and repeated concerns, failure to respond to advice, escalation in behaviour or an emerging pattern may alter the threshold and require formal safeguarding or disciplinary procedures.

12.3 Concern may meet the harm threshold

Where the concern may meet the harm threshold, the Principal will consult the LADO and follow the School's procedure for managing allegations against adults. Internal investigation, suspension, HR action or other measures will be considered only in accordance with safeguarding advice and employment procedures.

12.4 Separate concern about the welfare of a child

Where the information also raises a concern about a child's safety or wellbeing, the DSL will ensure the main Child Protection and Safeguarding Policy is followed. The adult-conduct process and the child-protection response may need to proceed in parallel.

12.5 Procedure where the harm threshold may be met

- The Principal (or Chair of Trustees where the concern is about the Principal) will follow **Appendix D** and LADO advice. No member of staff or the Board of Trustees will undertake a safeguarding investigation before receiving appropriate advice. The School will take immediate steps to safeguard the child and manage any ongoing risk.
- The School, together with Children's Social Care and the police where involved, will consider the impact on the child and provide support as appropriate. The child and family will be kept appropriately informed, subject to safeguarding and investigative requirements.
- The adult who is the subject of an allegation will be treated fairly and supported appropriately. HR advice will be obtained where required and the adult may seek support from their union, professional association or another appropriate source. A named representative may be appointed to keep the adult updated, subject to any restrictions imposed by external agencies.
- The School will observe legal restrictions on publication of material that may lead to identification of a teacher who is the subject of an allegation where those restrictions apply.
- The School will make referrals to the Disclosure and Barring Service where the legal referral criteria are met. In the case of teaching staff, the School will also consider whether referral to the Teaching Regulation Agency is required.
- Where an allegation concerns a supply teacher or other externally employed adult, the School will not cease to use that person solely as a means of avoiding the safeguarding process. The relevant employer or agency will be involved and the School will co-operate with LADO, police and Children's Social Care enquiries.
- Where an allegation relates to an individual or organisation using School premises for activities involving children, the School will respond in the same way as to any other safeguarding allegation, including informing the LADO as appropriate.

13. RECORDING, CONFIDENTIALITY AND INFORMATION SHARING

All low-level concerns, decisions and actions will be recorded clearly, accurately and securely. Records should include:

- a clear summary of the concern;
- the context in which it arose;
- the name of the person sharing the concern, unless anonymity is requested and can reasonably be maintained;
- relevant information gathered during initial assessment;
- the threshold decision and reasons for it;
- details of any advice sought, including LADO advice where applicable;
- actions taken, decisions reached and the outcome; and
- any review, support, monitoring or follow-up arrangements.

Records will be held confidentially and securely in accordance with the School's safeguarding recording arrangements, data-protection requirements and records-retention arrangements. Access will be restricted to those who need the information for safeguarding, management, HR, regulatory or legal purposes.

Information will be shared on a need-to-know basis where it is necessary and proportionate to safeguard children or fulfil the School's legal duties. Confidentiality must not be used as a reason to withhold information where sharing is required to protect a child.

Employment references and personnel records will be handled in accordance with Keeping Children Safe in Education, employment law and School procedures. The mere existence of a low-level concern will not automatically determine what is included in a reference.

14. PATTERNS, MONITORING AND ORGANISATIONAL LEARNING

Low-level concerns must be considered individually and collectively. The Principal and DSL will periodically review records to identify possible patterns relating to an individual adult, team, department, phase of the School or the wider culture.

Where a pattern becomes sufficiently concerning, the threshold will be reconsidered and the LADO consulted where appropriate. The School will also consider whether aspects of culture, working practices, traditions, supervision, physical environment, communications, role expectations or policy may have contributed to uncertainty or blurred boundaries.

Learning may result in changes to policy, induction, training, supervision, physical arrangements, communication or management practice. The aim is not simply to respond to individual events but to strengthen the safeguarding culture of the School.

15. SUPPORT, FAIRNESS AND WELLBEING

The welfare of children is the paramount consideration. At the same time, adults who raise concerns, adults who self-report and adults who are the subject of concerns should be treated with dignity, procedural fairness and appropriate confidentiality.

Where a child has been made uncomfortable, distressed or otherwise affected by an adult's behaviour, the School will consider appropriate pastoral and safeguarding support. Where an adult is the subject of a concern, the School will consider appropriate management, HR, union/professional-association and wellbeing support, consistent with the needs of the safeguarding process.

The School will not tolerate victimisation of a person who raises a genuine concern in good faith. Deliberately false or malicious allegations may be addressed separately under appropriate School procedures.

16. TRAINING AND INDUCTION

All staff and relevant adults will receive information about professional boundaries, low-level concerns and reporting arrangements as part of induction and ongoing safeguarding training. Training will reinforce that:

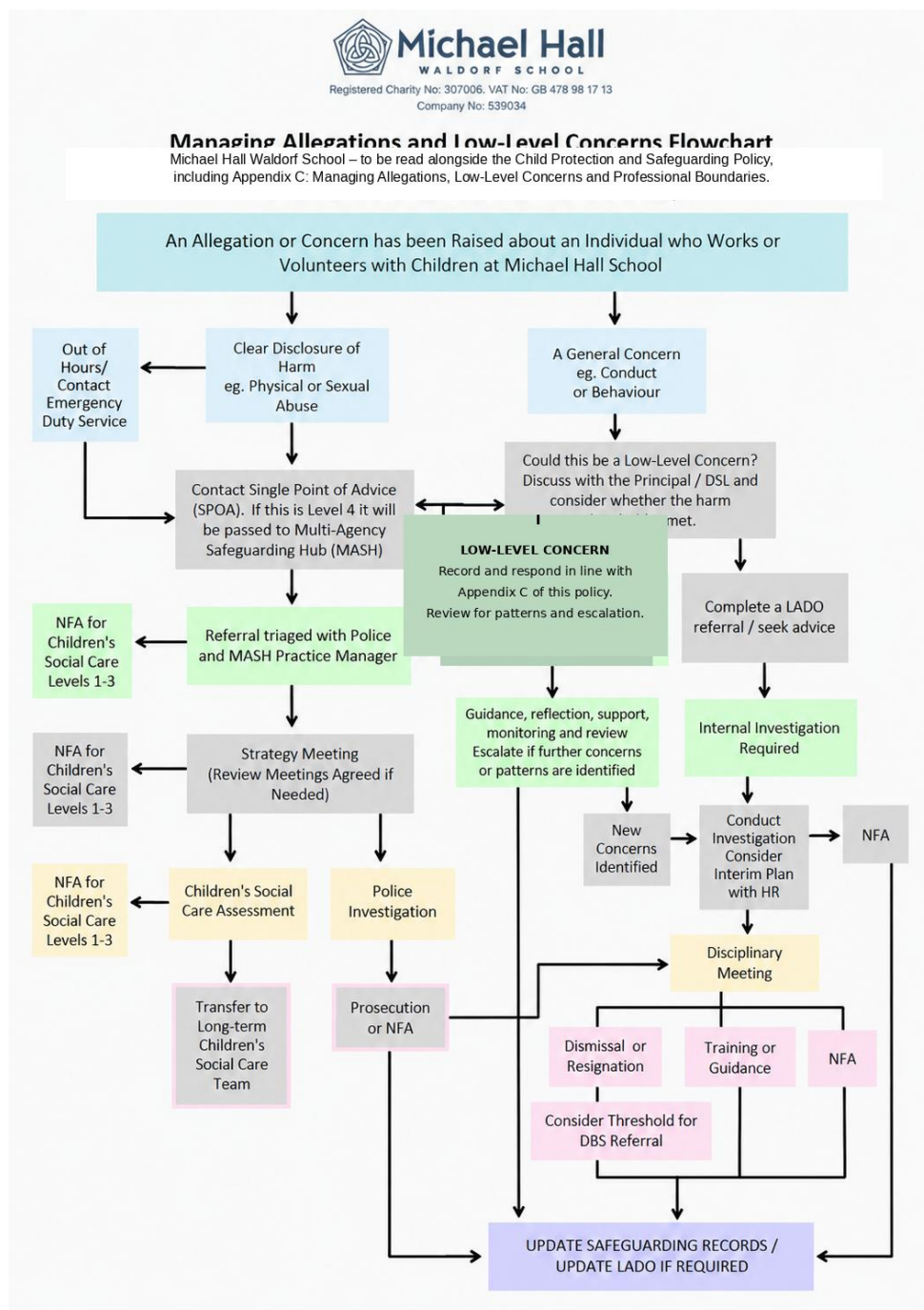
- safeguarding is everyone's responsibility;
- a low-level concern is not insignificant;
- adults should report concerns rather than investigate them;
- self-reporting is encouraged;
- professional boundaries apply across all phases and all forms of School activity; and
- patterns and cultural learning are important safeguarding information.

17. MONITORING AND REVIEW

This appendix will be reviewed as part of the annual review of the Child Protection and Safeguarding Policy, and sooner where there is a change to statutory guidance, local safeguarding procedures, or learning from a concern indicates that amendment is required.

APPENDIX D: MANAGING ALLEGATIONS AND LOW-LEVEL CONCERNS FLOWCHART

This flowchart should be read alongside [Appendix C](#) and the main Child Protection and Safeguarding Policy. For the purposes of this policy, the Principal is the case manager for concerns about adults. If a low-level concern is first shared with the DSL, it must be passed promptly to the Principal. SPoA refers to the East Sussex Single Point of Access.



Accessible text summary of the flowchart

- If there is a clear disclosure of harm, contact SPoA (or the Emergency Duty Service out of hours) and follow advice; Level 4 concerns may be passed to MASH.

- If the concern is about conduct or behaviour, report it to the Principal. If it is first shared with the DSL, the DSL will pass it promptly to the Principal. If the harm threshold may be met, or there is doubt about the threshold, seek LADO advice before an internal safeguarding investigation proceeds.
- Low-level concerns are recorded and managed under [Appendix C](#), with guidance, reflection, support, monitoring and review of any emerging pattern.
- Where the harm threshold may be met, seek LADO advice/referral before an internal safeguarding investigation proceeds.
- HR advice and an interim safeguarding plan should be considered where an internal investigation is advised.
- Possible outcomes include no further action, training/guidance, disciplinary action, dismissal/resignation and consideration of DBS referral where the threshold is met.
- Safeguarding records must be updated and the LADO updated where required.

APPENDIX E

PREVENTING RADICALISATION INTO TERRORISM - THE PREVENT DUTY

1. Purpose

Michael Hall School recognises that safeguarding children from radicalisation into terrorism forms part of its wider safeguarding responsibilities.

Children may be susceptible to radicalisation into terrorism. As with other safeguarding risks, staff should maintain an attitude of “it could happen here”, remain professionally curious and act promptly where concerns arise.

The school will take a child-centred, proportionate and safeguarding-led approach. Concerns about radicalisation will be considered within the wider circumstances of the individual child and will not be based on assumptions about religion, ethnicity, culture, nationality, political views or other protected characteristics.

This appendix forms part of the School’s Child Protection and Safeguarding Policy and should be read alongside the procedures within that policy for identifying, recording, reporting and responding to safeguarding concerns.

2. The Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015, specified authorities, including schools, must have due regard to the need to prevent people from being drawn into terrorism.

The Prevent Duty forms part of the School’s existing safeguarding responsibilities. It is not treated as a separate safeguarding system.

The School will take a proportionate approach to Prevent which reflects the age and needs of pupils, the nature and size of the School, the School’s local context, local and national risks, online risks, the needs and vulnerabilities of individual children, and information provided by the Local Authority, police, safeguarding partners and Prevent partners.

3. Definitions

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

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

Terrorism involves the use or threat of serious violence, serious damage to property, or serious disruption to electronic systems, designed to influence government or intimidate the public for a political, religious or ideological cause.

The School recognises that there is no single route or profile through which a person may become susceptible to radicalisation.

A child holding strong views, criticising government policy, taking an interest in national or international affairs, showing an interest in a political ideology or religion, expressing a lawful political or religious belief, or adopting visible signs of identity does not, by itself, mean that the child is susceptible to radicalisation.

Concerns will therefore be considered in context and based on evidence rather than stereotypes or assumptions.

4. Prevent Risk Assessment

The School will maintain an appropriate Prevent risk assessment as part of its wider safeguarding arrangements.

The assessment will consider, where relevant: the local context and known local risks; national or international developments where these could have implications for pupils; online radicalisation and access to terrorist or extremist material; pupils' age and developmental stage; particular vulnerabilities or contextual factors; curriculum provision; online filtering and monitoring; staff knowledge and training; visiting speakers and external organisations; use of School premises; safeguarding reporting and referral arrangements; and arrangements for responding to individual concerns.

Where risks are identified, the School will record appropriate actions to reduce or manage those risks.

The DSL will have oversight of the Prevent risk assessment and will ensure that it is reviewed regularly and when circumstances or relevant guidance change.

The School's Prevent arrangements are supported by existing safeguarding controls including its Visiting Speakers Register, Visiting Speaker Form, online filtering and monitoring arrangements, safeguarding training, record-keeping and referral procedures.

The School's assessment will also take account of local contextual safeguarding risks, including any known risks relating to criminal exploitation, county lines, serious youth violence or gang activity, while recognising that these are distinct from radicalisation into terrorism.

5. Understanding and recognising concerns

Staff should be alert to changes or patterns of behaviour that may indicate that a child requires further safeguarding support.

There is no single checklist or profile for radicalisation. Individual indicators should not normally be considered in isolation.

Concerns requiring further consideration may include accessing, possessing or repeatedly sharing terrorist or extremist material; expressing support for terrorist violence or terrorist organisations; seeking to justify or legitimise violence in furtherance of an ideological cause; expressing a desire or intention to participate in terrorist activity; concerning communication or contact with individuals or groups promoting terrorism; significant engagement with online networks or material associated with terrorism; attempts to recruit, influence or encourage others towards terrorist activity; fixation on terrorist attacks, perpetrators or ideologically motivated violence where other concerning factors are present; expressing an intention to travel for purposes connected with terrorism; significant behavioural changes alongside other information indicating susceptibility to radicalisation; or information received from another child, a parent, professional or agency which gives rise to concern.

These examples are not exhaustive and are not a diagnostic checklist.

Staff are not expected to decide whether a child has been radicalised or whether a criminal offence has taken place. Their role is to identify and report concerns so that they can be appropriately assessed.

6. Online radicalisation

The School recognises that children can encounter harmful terrorist and extremist material online and that online environments may be used to influence, groom, manipulate or radicalise individuals.

Prevent therefore forms part of the School's wider approach to online safety.

The School will maintain appropriate filtering and monitoring systems; consider Prevent risks when reviewing filtering and monitoring arrangements; provide pupils with age-appropriate online safety education; help pupils develop digital and media literacy; support pupils to recognise manipulation, misinformation, disinformation and harmful online narratives; encourage pupils to question the reliability and purpose of online material; provide pupils with clear routes for reporting concerning online content; respond appropriately to concerns about access to or sharing of terrorist or extremist material; and ensure relevant concerns are reported to the DSL or DDSL.

7. Responsibilities of all staff

All staff must understand that preventing radicalisation is part of safeguarding; remain alert to possible concerns; maintain professional curiosity; consider behaviour within the wider context of the child; avoid stereotyping or assumptions based on religion, ethnicity, culture, nationality, identity or political views; listen to children and take concerns seriously; record concerns factually and accurately; report concerns promptly to the DSL or DDSL; follow the procedures contained within the Child Protection and Safeguarding Policy; and undertake safeguarding and Prevent training appropriate to their role.

Staff must not investigate concerns themselves.

Where staff are unsure whether something constitutes a Prevent concern, they should discuss it with the DSL or DDSL.

A concern does not need to amount to proof that a child is being radicalised before it is shared with the DSL.

8. Role of the Designated Safeguarding Lead

The DSL has lead responsibility for safeguarding concerns relating to radicalisation and Prevent.

The DSL, supported by the DDSLs, will maintain appropriate knowledge and understanding of the Prevent Duty; understand local Prevent arrangements and referral pathways; provide advice and support to staff; ensure concerns are considered promptly and proportionately; consider the child's circumstances holistically; consider relevant vulnerability and protective factors; ensure the child's voice is appropriately considered; seek advice from Prevent partners or other safeguarding agencies when necessary; determine whether a Prevent referral or other safeguarding referral is appropriate; liaise with Children's Social Care, police, Local Authority Prevent colleagues and other agencies where appropriate; contribute to relevant multi-agency processes; maintain appropriate safeguarding records; oversee the School's Prevent risk assessment; ensure identified mitigating actions are implemented; ensure appropriate staff training and updates are provided; and keep the School's Prevent arrangements under review.

9. Notice, Check, Share

Where there is a concern that a child may be at risk of radicalisation, the School will follow the current Notice, Check, Share approach.

Notice: Staff may notice a change, behaviour, disclosure, online activity, communication or other information which causes concern. Staff should record what they have actually seen, heard or been told and avoid making assumptions or attempting to diagnose the concern.

Check: The concern should be shared with the DSL or DDSL. The DSL will consider available information and context to establish whether further action may be needed. Checking does not mean conducting an investigation.

Share: Where concerns remain, information will be shared with the appropriate agency or professional in accordance with the School's safeguarding and information-sharing procedures. This may include seeking Prevent advice, making a Prevent referral, making another safeguarding referral, or contacting the police where necessary.

10. Responding to concerns

The response to a concern will be proportionate to the circumstances.

Following consideration by the DSL, actions may include no further safeguarding action where the concern is satisfactorily resolved; continued monitoring; discussion with the child; pastoral support; appropriate educational support; discussion with parents or carers where this is safe and appropriate; seeking advice from the Local Authority Prevent team or another Prevent partner; Early Help; a referral to Children's Social Care; a Prevent referral; consultation with or referral to the police; or emergency action where there is an immediate risk.

All decisions, actions and the reasons for them will be recorded.

11. Prevent referrals

A Prevent referral should be considered where there is a concern that an individual may be at risk of becoming involved in terrorism or supporting terrorism.

Where a Prevent referral is required, the School will use the current national or locally agreed referral arrangements.

The DSL may seek advice from Prevent partners before making a referral where appropriate.

A Prevent referral is intended to enable an appropriate assessment of the concern and potential support. It should not be treated by staff as a finding that a child has committed an offence.

The School will continue to provide appropriate safeguarding and pastoral support to the child while any external assessment takes place.

12. Immediate or serious risk

Where information indicates that a child or another person may be in immediate danger, the School will act immediately.

The police should be contacted without delay where there is an immediate threat to life or safety or where information indicates that a person may be preparing to commit a terrorism-related or other serious criminal offence.

A Prevent referral must never delay necessary emergency action.

Where there are concurrent child protection concerns, Children's Social Care will also be contacted in accordance with the procedures contained within this Child Protection and Safeguarding Policy.

13. Channel

Channel is a voluntary and confidential support programme which provides early support to people identified as susceptible to being drawn into terrorism.

Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel to consider risk and appropriate support. An individual's consent is required before support through Channel is provided.

Where appropriate, the School will cooperate with Channel processes; provide relevant safeguarding information; attend meetings when required; contribute to assessments; contribute to support plans where appropriate; and continue to support the child's education, welfare and safeguarding needs.

Information will be shared in accordance with safeguarding, information-sharing and data-protection requirements.

14. Parents and carers

The School recognises that parents and carers are important safeguarding partners.

Where appropriate and safe, parents or carers will be involved when concerns arise and will be supported to understand the nature of those concerns.

However, parents or carers will not be informed before information is shared where doing so could place the child or another person at increased risk; increase the risk of harm; prejudice a police or other statutory investigation; result in evidence being destroyed or concealed; or otherwise be contrary to the child's best interests.

The DSL will determine whether and when parents or carers should be contacted and may seek advice from statutory agencies where necessary.

15. Information sharing and record keeping

Concerns relating to radicalisation will be managed in accordance with the information-sharing and record-keeping requirements within the main Child Protection and Safeguarding Policy.

Records will be factual, clear and proportionate and should include, where applicable: the nature of the concern; what was observed, heard or disclosed; the child's own words where appropriate; relevant contextual information; discussions with the child; discussions with parents or carers; discussions with members of staff or other professionals; advice received; decisions made; actions taken; reasons for decisions; and outcomes.

Information will be shared where necessary and proportionate to safeguard the child or another person.

16. Curriculum, critical thinking and resilience

The School will help pupils develop the knowledge, skills and confidence required to recognise and resist harmful influence.

Through an age-appropriate curriculum and the wider life of the School, pupils will be supported to develop critical thinking; digital and media literacy; the ability to assess the reliability of information; understanding of misinformation, disinformation and manipulation; respectful discussion and disagreement; understanding of different beliefs and perspectives; respect for the rights of others;

resilience to harmful influence; confidence to question harmful narratives; and confidence to seek help when something concerns them.

Pupils should be able to discuss difficult, sensitive and controversial matters within a safe and appropriately supported educational environment.

17. Political impartiality and lawful expression

The School recognises the importance of distinguishing between lawful expression and a safeguarding concern.

Prevent does not prohibit pupils from holding or expressing lawful political views; discussing controversial issues; criticising government policy; taking an interest in political movements; practising or exploring religion; questioning established views; or participating in lawful campaigning or debate.

Such matters will not, in themselves, be treated as evidence that a child is being radicalised.

Where political issues are taught, the School will comply with its legal responsibilities concerning political impartiality and the balanced presentation of opposing views.

Safeguarding action will be based on the child's behaviour, circumstances and risk, rather than disagreement with the child's lawful beliefs or opinions.

18. Visiting speakers and external organisations

The School recognises that visiting speakers and external organisations can make a valuable contribution to pupils' education. Appropriate safeguards are nevertheless required to ensure that pupils are not exposed to material which presents a safeguarding risk or encourages support for terrorism or terrorist violence.

The School maintains a Visiting Speakers Register.

Any member of staff wishing to invite a visiting speaker is required to complete the School's Visiting Speaker Form in advance of the visit and follow the School's approval procedure.

Appropriate consideration will be given to the identity of the speaker and any organisation represented; the purpose of the visit; its educational value; the proposed subject matter and content; age appropriateness; publicly available information where relevant to safeguarding; whether any Prevent or other safeguarding concerns arise; the arrangements for supervision; the audience and setting; any materials which will be presented or distributed; and any other measures required to ensure the visit can proceed safely.

Approved visiting speakers will be recorded on the Visiting Speakers Register.

Visiting speakers will be appropriately supervised in accordance with the School's procedures.

Where information identified before a visit gives rise to a safeguarding concern, approval may be withheld or appropriate additional controls put in place.

Where a concern arises during or following a visit, this must be reported to the DSL or DDSL immediately and dealt with under the School's safeguarding procedures.

19. Contextual safeguarding and overlapping risks

The School recognises that safeguarding risks do not always occur in isolation. A child who is vulnerable to radicalisation may also be vulnerable to other forms of exploitation or harm, including child criminal exploitation, county lines, gang involvement, serious youth violence, sexual exploitation, trafficking or online exploitation.

Where concerns arise, staff and the DSL will consider the child's circumstances holistically and will not assume that one safeguarding concern explains all aspects of the child's experience.

Where indicators suggest child criminal exploitation or county lines, the School will follow its child protection and safeguarding procedures and relevant local referral pathways. A Prevent referral should only be considered where there is also a concern relating to susceptibility to radicalisation into terrorism.

20. Staff training

The School will ensure that staff receive appropriate Prevent awareness as part of safeguarding induction and ongoing safeguarding training.

Training and updates will enable staff to understand the purpose of the Prevent Duty; how radicalisation into terrorism may occur; the importance of context and avoiding stereotypes; potential online and offline risks; how to recognise and report concerns; Notice, Check, Share; the role of the DSL and DDSL; Prevent referral arrangements; the purpose of Channel; and how Prevent relates to the School's wider safeguarding responsibilities.

The DSL and DDSLs will maintain appropriate knowledge of current Prevent guidance, local risk and referral arrangements.

21. Equality, inclusion and avoiding discrimination

The School will implement its Prevent responsibilities in a way that respects equality, inclusion and the rights of pupils.

A child's religion, race, ethnicity, nationality, culture, political views or other protected characteristic will not in itself be considered an indicator of radicalisation.

Staff will avoid stereotyping and will ensure that professional judgements are based on relevant information, behaviour, context and safeguarding risk.

The School recognises that inappropriate assumptions or discriminatory responses may cause harm, undermine trust and create barriers to children seeking help.

22. Transfer to another education setting

Where a pupil who has been the subject of relevant Prevent or Channel involvement transfers to another school or college, the DSL will consider what safeguarding information should be shared with the receiving setting in accordance with the information-sharing and transfer provisions contained within the main Child Protection and Safeguarding Policy.

Information will be shared securely and, on a need-to-know basis so that necessary safeguarding or pastoral support can continue.

23. Governance, monitoring and review

The Board of Trustees will ensure that the school has appropriate arrangements in place to meet its responsibilities under the Prevent Duty as part of its wider safeguarding responsibilities.

The DSL will monitor the implementation of this appendix and the School's Prevent arrangements.

This will include oversight of the Prevent risk assessment; identified actions; Prevent-related safeguarding concerns and referrals; staff training; online filtering and monitoring; visiting speaker arrangements; the curriculum and preventive education; and relevant developments in statutory guidance or local risk.

This appendix will be reviewed as part of the annual review of the Child Protection and Safeguarding Policy, and earlier where statutory guidance changes; local risks materially change; learning from an incident or referral indicates that arrangements should be amended; or safeguarding partners advise that changes are required.

APPENDIX F

RESTRICTIVE INTERVENTIONS, INCLUDING THE USE OF REASONABLE FORCE

1. Principles

The School is committed to creating a safe, supportive and respectful environment in which the need to use restrictive interventions is minimised.

Restrictive interventions, including reasonable force, will only be used where necessary and will always be reasonable, proportionate and for the shortest time necessary.

Staff will seek to prevent situations from escalating through appropriate planning, positive relationships, early intervention and de-escalation wherever practicable.

The School will have regard to the Department for Education guidance Restrictive interventions, including the use of reasonable force, in schools (2026) and relevant Local Authority guidance.

2. When reasonable force may be used

Members of staff may use reasonable force where it is necessary to prevent a pupil from committing an offence, injuring themselves or another person, damaging property, or causing disorder.

Any force used must be proportionate to the circumstances and the seriousness of the behaviour or risk.

Restrictive intervention must never be used as a punishment or for the purpose of causing pain, humiliation or distress.

3. Prevention and de-escalation

Wherever possible, staff will use preventative and de-escalation strategies before considering physical intervention.

These may include calm verbal communication; reducing demands or stimulation; offering space or time; changing the environment; seeking assistance from colleagues; using known strategies contained within an individual pupil's support or behaviour plan; and considering the pupil's communication, sensory, SEND, medical or emotional needs.

4. SEND and individual needs

Staff will take account of a pupil's age, SEND, communication needs, medical needs, trauma history and other relevant vulnerabilities when considering whether and how to intervene.

Where a pupil is known to be at increased risk of requiring physical intervention, appropriate strategies should be identified through an individual support, behaviour or risk-management plan.

5. Recording and reporting

All significant incidents involving the use of reasonable force will be recorded in accordance with statutory requirements and the School's safeguarding procedures.

Records will include, where applicable: the circumstances leading to the intervention; the reason intervention was considered necessary; the nature and duration of the intervention; the staff involved; any injury or medical attention required; the pupil's views where appropriate; actions taken following the incident; and any learning or changes required to reduce the likelihood of recurrence.

Parents or carers will be informed of significant incidents in accordance with statutory requirements. The DSL will be informed of incidents involving restrictive intervention where there are safeguarding implications or concerns.

6. Seclusion

Seclusion will only be used in accordance with the 2026 Department for Education guidance and statutory requirements.

Any use of seclusion will be appropriately supervised, recorded and reported and will be for no longer than is necessary to manage the immediate risk.

7. Following an incident

Following an incident, the School will consider the welfare and wellbeing of the pupil; whether medical attention is required; whether staff involved require support; the pupil's views; whether the incident indicates an unmet safeguarding, SEND or pastoral need; whether an existing support or behaviour plan needs to be reviewed; whether further risk assessment is required; and whether the incident raises concerns about the conduct of a member of staff.

Where an incident may give rise to an allegation that a member of staff has harmed a child, the School will consider whether consultation with the Local Authority Designated Officer (LADO) is required, in accordance with the procedures within the Child Protection and Safeguarding Policy.

8. Monitoring and review

The School will monitor incidents involving restrictive intervention to identify patterns, evaluate whether preventative strategies are effective and identify any changes required to individual plans, staff training or wider school practice.

The Board of Trustees will maintain oversight of the School's arrangements for the use of restrictive interventions and reasonable force.

APPENDIX G: LOW-LEVEL CONCERN REPORTING FORM

Thank you for sharing a concern. Reporting early helps the School protect children, support safe professional practice and identify patterns. Complete as much factual information as you can. Do not investigate the matter yourself or discuss it with people who do not need to know.

Return this form promptly to the Principal. If the concern is about the Principal, report it to the Chair of Trustees. If a child may be at immediate risk of harm, contact the DSL immediately and follow child-protection procedures.

Your details	
Name (optional)	
Role	
Date and time of completing this form	
Type of report	☐ Concern about another adult ☐ Self-report ☐ Third-party concern
Details of the adult the concern is about	
Name	
Role / relationship to the School	
Relationship to person reporting (if relevant)	
Details of concern	
What happened? Please record factual detail, including date, time, location, words/actions and context.	
Why does this concern you or appear inconsistent with the Staff Code of Conduct / professional boundaries?	
Who else witnessed, heard or may have relevant information?	
Children / young people involved	
Name(s) / class(es) if known	
Do you believe there is an immediate or future risk of harm? Explain what leads you to that view.	
Has the DSL already been informed about any child-welfare concern? If yes, when and by whom?	
Additional information and declaration	

Any other relevant information	
Are you willing to meet with the Principal / safeguarding lead to discuss this concern?	☐ Yes ☐ No
Signature / name	
Date	
Safeguarding / management record	
Date and time received	
Received by	
Immediate child-protection action required?	
Initial threshold decision	
Rationale for threshold decision	
LADO advice sought? Date / outcome / reference	
Adult's response (where appropriate)	
Actions agreed	
Support / training / supervision / monitoring arrangements	
Pattern review completed	
Outcome and date closed / escalated	
Record location / safeguarding system reference	
Principal / case manager signature and date	
Record securely	

This form contains confidential safeguarding and personnel information. Store and share it only in accordance with the Child Protection and Safeguarding Policy, data protection requirements and the School's records-management arrangements.