EATON HOUSE SCHOOLS

SAFEGUARDING AND CHILD

PROTECTION POLICY AND

PROCEDURES

This policy applies to Eaton House Schools (Eaton House The Manor & Eaton House Belgravia) including EYFS

Responsibility:	Mrs Roosha Sue (DSL, EHTM Nursery) Mrs Bethany Pike (DSL, EHTM Girls') Mrs Fiona Bellamy-Loughton (DSL, EHTM Pre-Prep) Mr Paul Russell (DSL, EHTM Prep) Miss Mariam Asadi (DSL, EHB) Mrs Alison Fleming (DSL, Eaton House Schools)
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Introduction

There is a whole School commitment to safeguarding of all our children and young people. This extends from our board of governors, senior leadership team and everyone who works and volunteers at the Schools. All staff have a duty to maximise the welfare, health, and safety of anyone in our care and to take immediate action to protect them from harm or any risk of harm. This also includes being aware of and / or recognise potential scenarios where children might be at greatest risk of harm e.g. at the end of the school day or out of normal school hours.

All staff understand that safeguarding is "everyone's responsibility" and must act swiftly when any concerns are disclosed, or events witnessed.

Safeguarding is defined as protecting children from the maltreatment inside or outside the home, including online. KCSIE 2026.

All children, without exception, have the right to protection from abuse regardless of disability, sex, gender reassignment, race, religion or belief, or sexual orientation (Equality Act 2010). At Eaton House Schools we recognise that these groups (including those who identify as LGBTQ+) may lack trusted adults with whom they can be open, and works to reduce any additional barriers they may face and provide a safe space for them to share any concerns with staff.

We recognise our duty to children in need of additional support and to children at risk or harm, including the additional vulnerability of pupils with SEND or certain health conditions. We recognise that children with SEND can be more prone to peer group isolation than other children and provide extra pastoral support for those children, if appropriate.

The School recognise their responsibilities for all aspects of safeguarding and child protection and the safety of pupils is always accorded the highest priority. Every child and young person should feel safe and protected from any form of abuse, neglect or exploitation including from using technology. Everyone who encounters children, and their families (or carers) has a role to play in safeguarding and should ensure their approach is child centered: this means considering at all times what is in the best interests of the child.

Eaton House Schools will operate safeguarding procedures in line with our locally agreed multi-agency safeguarding arrangements put in place by our safeguarding partners.

This Policy is the responsibility of the Principal, Heads, Designated Safeguarding Leads (DSLs) and their deputies, Bursar, Compliance Manager and is reviewed annually by the Board of Governors as part of Eaton House Schools Annual Safeguarding Review or when legislation or government guidance dictates.

It has been updated with having due regard to *Keeping Children Safe in Education* (KCSIE) September 2026, the governments' statutory guidance "working together to safeguard children" as well as requirements from our local Councils' Safeguarding Children's Partnership.

This policy is available on Eaton House Schools website:

https://www.eatonhouseschools.com/ and it is also available on request from

Eaton House The Manor office on 02079246000 Eaton

House Belgravia office on 0207730 9343

or by email admin@eatonhouseschools.com

The policy is available in large print or another accessible format if required.

The procedures as outlined in this policy apply wherever our Eaton House Schools staff, volunteers or contractors are working with or near our pupils even when this is away from our organisation, for example on an educational visit or residential trip.

This policy applies to all children in the Eaton House Schools including those in the EYFS.

Relevant Statutory and Non-Statutory Advice

This policy is written with regards to both the advice below and in Appendix 1, section 28 of this policy:

Keeping Children Safe in Education (KCSIE) September 2026	Keeping Children Safe in Education
The SEN Code of Practice 2015	SEND_Code_of_Practice_January_2015.pdf
Disqualification Under the Childcare Act 2006 – updated August 2018	https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006
Working Together to Safeguarding Children, DfE (March 2026)	Working Together to Safeguard Children
Working Together to Improve School Attendance, DfE (July 2026)	https://www.gov.uk/government/publications/working-together-to-improve-school-attendance
DfE statutory guidance 'Children missing education' (August 2024)	https://www.gov.uk/government/publications/children-missing-education
The Independent School Standards (England) Regulations, DfE, 2014. (April 2026)	https://assets.publishing.service.gov.uk/media/5cd3fc2fe5274a3fd6ee74b0/Independent_School_Standards-_Guidance_070519.pdf
EYFS Framework, (July 2026) 1st Sept 2026 implementation	Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)
DfE Guidance What to do if you're worried a child is being abused (March 2015)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

RSE and Health Education (July 2025, 1st Sept 2026 implementation)	https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education
Prevent Duty 2015 (March 2024) Safeguarding Learners Vulnerable to Radicalisation Sept 2023	Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk) **DfE Guidance** https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty
Martyn's Law – Terrorism (Protection of Buildings) Act 2025 Martyn's Law – Home Office Fact Sheet	Martyn's Law: the SIA's new regulatory role - GOV.UK Terrorism (Protection of Premises) Act 2025: factsheets - GOV.UK Terrorism (Protection of Premises) Act 2025: factsheets - GOV.UK
DfE Meeting the Digital Standards 2026	Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK
Allergy Safety in Schools Statutory Guidance – July 2026	Allergy safety in schools statutory guidance
Teaching online safety in Schools guidance 2023	Teaching online safety in schools - GOV.UK
Plan technology for your school – Nov 2025	https://www.gov.uk/guidance/plan-technology-for-your-school
Meeting Digital and Technology Standards in Schools and Colleges – Cyber-Security Standard – June 2026	Meeting digital and technology standards in schools and colleges - Cyber security: core standard - Guidance - GOV.UK
NSPCC E-Safety Guidance for Schools (April 2026)	Online safety (e-safety) and schools | NSPCC Learning
Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024) (Non-statutory advice)	Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)
Guidance that any child investigated by the police whether in or out of School should have an appropriate adult with them. (December 2023)	https://cscp.org.uk/training/pace-child-sexual-exploitation-free-online-awareness-tool/ https://www.gov.uk/government/publications/pace-code-c-2019
DfE Guidance – Teachers Misconduct - The prohibition of Teachers – Feb 2022 Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession Website for reporting a teacher	Teacher misconduct: the prohibition of teachers (publishing.service.gov.uk) Report serious teacher misconduct - GOV.UK
DfE Guidance - After-school clubs, community activities, and tuition Safeguarding guidance for providers (February 2026)	After-school clubs, community activities, and tuition - safeguarding guidance for providers (publishing.service.gov.uk)

Alternative Provision – Guide for Local Authorities and schools Feb 2025	Arranging Alternative Provision - guide for LAs and schools
Countering online conspiracies in schools	**https://pearsfoundation.org.uk/partners/the-commission-into-countering-online-conspiracy-in-schools/**
Education Against Hate Guidance Documents	https://www.educateagainsthate.com/category/school-leaders/
HM Government Enough Campaign (Violence against Women and Girls)	https://enough.campaign.gov.uk/guidance-and-resources-for-teachers
The Lucy Faithfull Foundation – ShoreSpace A confidential website service for teenagers worried about theirs or someone else's sexual thoughts and behaviours.	https://shorespace.org.uk/
The Children's Society – Preventing Child Sexual Exploitation Guidance	Preventing Child Sexual Exploitation | The Children's Society
Centre of Expertise on Child Sexual Abuse – Guidance	Resources for education settings | CSA Centre
Children Act 1989	Children Act 1989 (legislation.gov.uk)
Children Act 2004	Children Act 2004 (legislation.gov.uk)
Childcare Act 2006	https://www.legislation.gov.uk/ukpga/2006/21
NSPCC advice on protecting children with SEN and disabled children and young people (July 2026))	https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#risk-and-vulnerability-factors

Relevant Policies

This safeguarding and child protection policy and procedure has also been developed by taking account of the following Eaton House Schools policies below and should be read in conjunction with them.

ICT Acceptable Usage Policy
Anti-Bullying Policy (Pupils)
Pupil Behaviour, Discipline and Exclusions Policy EHTM-Nursery, EHTM Girls, EHTM Pre-Prep, EHTM-Prep, EHB EYFS and Pre-Prep
Missing Child Policy
Staff Behaviour Safeguarding (Code of Conduct) Policy
Cyberbullying Policy
Health and Safety Policy
Lone Worker Policy
Child on Child Abuse Policy
Low Level Concerns Policy
Selection, Recruitment and Disclosure Policy
Trips and Visits Policy
Sharing of Concerns (Whistleblowing) Policy
Attendance Policy
Online Safety Policy

Any questions regarding this policy should be directed towards the Designated Safeguarding Leads in the first instance.

Key Personnel for Safeguarding and Child Protection

Designated Safeguarding Leads (DSLs) Eaton House the Manor

Eaton House the Manor Nursery Mrs Roosha Sue (Head) During School Hours:02079246000 Ext:1400 E-mail: RSue@eatonhouseschools.com	**Eaton House the Manor Girls'** Mrs Bethany Pike (Form Teacher) During School Hours: 020 7924 6000 E-mail:bpike@eatonhouseschools.com
Eaton House the Manor Pre-Prep Mrs Fiona Bellamy-Laughton (Deputy Head) During School Hours: 020 7924 600 Ext: 1230 E-mail: flaughton@eatonhouseschools.com	**Eaton House the Manor Prep** Mr. Paul Russell (Assistant Head Pastoral) During School Hours: 020 7924 6000 Ext: 1268 E-mail: prussell@eatonhouseschools.com

Deputy Designated Safeguarding Leads (DDSLs) Eaton House the Manor

Eaton House the Manor Nursery Mireia Sanchez (Nursery Teacher) During School Hours: 020 7924 6000 E-mail: msanchezberbegal@eatonhouseschools.com	**Eaton House the Manor Girls'** Hillary Howard, Assist Head During School Hours: 020 7924 6000 E-mail: hhoward@eatonhouseschools.com Mrs Claire Fildes, Head During School Hours: 020 7924 6000 Ext:1500 E-mail: cfildes@eatonhouseschools.com
Eaton House the Manor Pre-Prep Mrs Kirsten Bond (Head) During School Hours: 020 7924 6000 Ext:1300 E-mail: kbond@eatonhouseschools.com	**Eaton House the Manor Prep** Mrs David Wingfield (Head) During School Hours: 020 7924 6000 Ext:1203 E-mail: dwingfield@eatonhouseschools.com

Eaton House Belgravia

Designated Safeguarding Lead (DSL) Eaton House Belgravia	Mariam Asadi (Deputy Head) During School Hours 020 7730 9343 Ext: 2021 E-mail: masadi@eatonhouseschools.com Lisa McNeill (Nursery Manager) During School Hours 020 7730 9343 E-mail: lmcneill@eatonhouseschools.com
Deputy Designated Safeguarding Lead (DDSL) Eaton House Belgravia	Christopher Halls (Head) During School Hours 020 7730 9343 Ext: 2022 E-mail: challs@eatonhouseschools.com

Designated Safeguarding Leads (DSLs) Eaton House School

Alison Fleming (Principal) 020 7924 6000 Ext: 1601 Email: afleming@eatonhouseschools.com	Sophie Boella 07523685 221 Email: nurse@eatonhouseschools.com

Designated Safeguarding Leads can be contacted by phone during school hours.

Outside school hours please email the Designated Safeguarding Lead, however if someone is at serious risk, please contact the police on 999.

Nominated Safeguarding Governor

Name:	Rachael Friend
Telephone:	020 3696 5300
Email:	rachael.friend@dukeseducation.com
Registered Address:	Dukes Education, Dukes House, 58 Buckingham Gate, London, SW1E 6AJ
Photo:	

Chair of Governors and Founder and Chairman of Dukes Education

Name:	Mr Aatif Hassan
Telephone:	020 3696 5300
Email:	aatif.hassan@dukeseducation.com
Registered Address:	Dukes Education, Dukes House, 58 Buckingham Gate, London, SW1E 6AJ
Photo:	

Key External Agencies, Services and Professionals' Contact Details

The telephone numbers of the local agencies responsible for child protection are listed below. They must be contacted within 24 hours of a disclosure or suspicion of abuse.

There is also an online tool Report child abuse to local council directs to the relevant local children's social care contact number. Please follow this link.

PLEASE NOTE YOU MUST REPORT TO THE LOCAL CHILDREN'S SOCIAL CARE IN WHICH THE CHILD LIVES.

Full local procedures are available from the Local Safeguarding Children Partnership at https://londonsafeguardingchildrenprocedures.co.uk/

The Department for Education – telephone helpline non-emergency advice for staff and governors for extremism	020 7340 7264

Advice Lines for Parents / Carers / Pupils

Childline	0800 1111
NSPCC	0808 800 5000
Ofsted's Whistle-blower Hotline	0300 123 3155
Forced Marriage Unit	020 7008 0151 fmu@fco.gov.uk

Please also see Appendix 3 for further contact details.

Our organisation does work with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

Please remember anyone can make a referral directly to children's social care or the Local Authority Designated Officer if they believe that a child is at risk or may be at risk of significant harm.

Eaton House Schools staff do not require parental consent to make such a referral to external statutory agencies.

If a direct referral is made by a member of staff, the DSL should also be informed as soon as possible or in their absence the Principal or our safeguarding governor.

Safeguarding
Kensington & Chelsea and Westminster

Worried about a child or young person?

WESTMINSTER
accesstochildrensservices@westminster.gov.uk
020 7641 4000 / Out of hours 020 7641 6000

KENSINGTON & CHELSEA
socialservices@rbkc.gov.uk
020 7361 3013

YES

Children Social Care

Children and families who are at high risk of harm based on the London Continuum of Need will receive intervention and ongoing support.

UNSURE

MASH

Where the level of risk is not clear, MASH will gather further information to determine next steps for support.

NO

Early Help Hub

Children and families who are a lower risk of harm based on the London Continuum of Need will receive early intervention support through the Early Help Hub.

LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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

Westminster
LADO@westminster.gov.uk **020 7641 7668**

Kensington and Chelsea
kclado.enquiries@rbkc.gov.uk **020 7361 3013**

If a child is at immediate risk, call 999

Other Key Contacts

Prevent Duty Hammersmith & Fulham and Kensington and Chelsea:
020 8753 5727 prevent@lbhf.gov.uk / prevent3@rbkc.gov.uk

Prevent Westminster:
020 7641 5071 prevent@westminster.gov.uk

LSCP Team
07739 315388

Ofsted:
0300 123 1231 enquiries@ofsted.gov.uk

Safeguarding Wandsworth

One MASH Contact Number

Online Multi-Agency Referral Form

020 8871 6622 (mash@wandsworth.gov.uk)
Out of hours (evenings/wkd/Bank Holidays 020 8871 6000

THE MASH

REPLY IN ONE WORKING DAY

Initial Screening

Child Already Open to Children Services

Allocated Social Worker/ Team Manager

New case (child may have been previously known)

Immediate Safeguarding Concern

CIN C&F Assessment

Referral is Complex/ Unclear and requires Multi-agency information sharing (as per info sharing policy)

MASH ENQUIRY/ MASH

Early Help Pathway

Request for Information 72hour Response

Assessment Team on Duty

Strategy Discussion

CIN C&F Allocation

Assessment Team on Duty

Early Help

Universal Services

LADO
Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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

LADO@wandsworth.gov.uk

If a child is at immediate risk, call 999

Other Key Contacts

Prevent Duty: 020 8871 6622

https://www.gov.uk/government/publications/pace-code-c-2019

Wandsworth Safeguarding Children Partnership: 020 8871 7401 wscp@wandsworth.gov.uk

Safeguarding Lambeth

First Response Team

If you think a child is at risk of being abused or neglected please contact Lambeth Children's Social Care.

helpandprotection@lambeth.gov.uk **020 7926 5555**

YES

Children Social Care

Children and families who are at high risk of harm based on the London Continuum of Need will receive intervention and ongoing support from the Referral and Assessment Team and Children in Need Teams.

UNSURE

MASH

Where the level of risk is not clear, MASH will gather further information to determine next steps for support.

NO

Early Help Hub

Children and families who are a lower risk of harm based on the London Continuum of Need will receive early intervention support through the Early Help Hub.

The Hub will undertake the initial contact, arrange the first TAC and determine community and targeted services which are best for the family.

LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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

LADO@lambeth.gov.uk
020 7926 4679 or 077 2082 8700

All referrals must also be e-mailed to the LADO.

If a child is at immediate risk, call 999

Other Key Contacts

Prevent Duty contact the Integrated Referral Hub: 020 7926 5555 helpandprotection@lambeth.gov.uk

Safeguarding Reporting Summary

In all circumstances, no investigation will take place by anyone at the Eaton House Schools until advice has been sought from the Children's Social Care Team or the LADO, who will advise Eaton House Schools on next steps to take.

If You suspect or know that a Child is or may be at risk of Harm
Immediate referral to Children's Social Care through the DSL as below – or direct referral if needed.

↓

Designated Safeguarding Lead
DSL

If the DSL unavailable

↓

Deputy Designated Safeguarding Lead
DDSL

If DDSL is unavailable

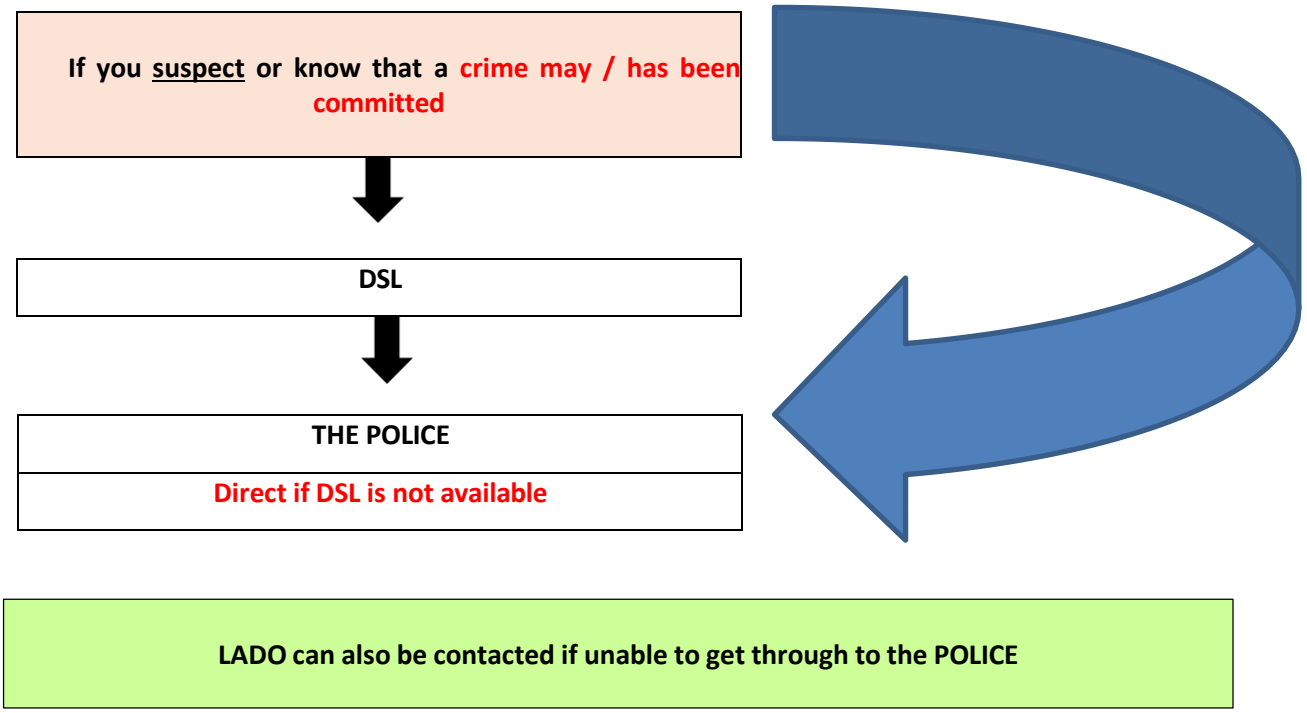
↓

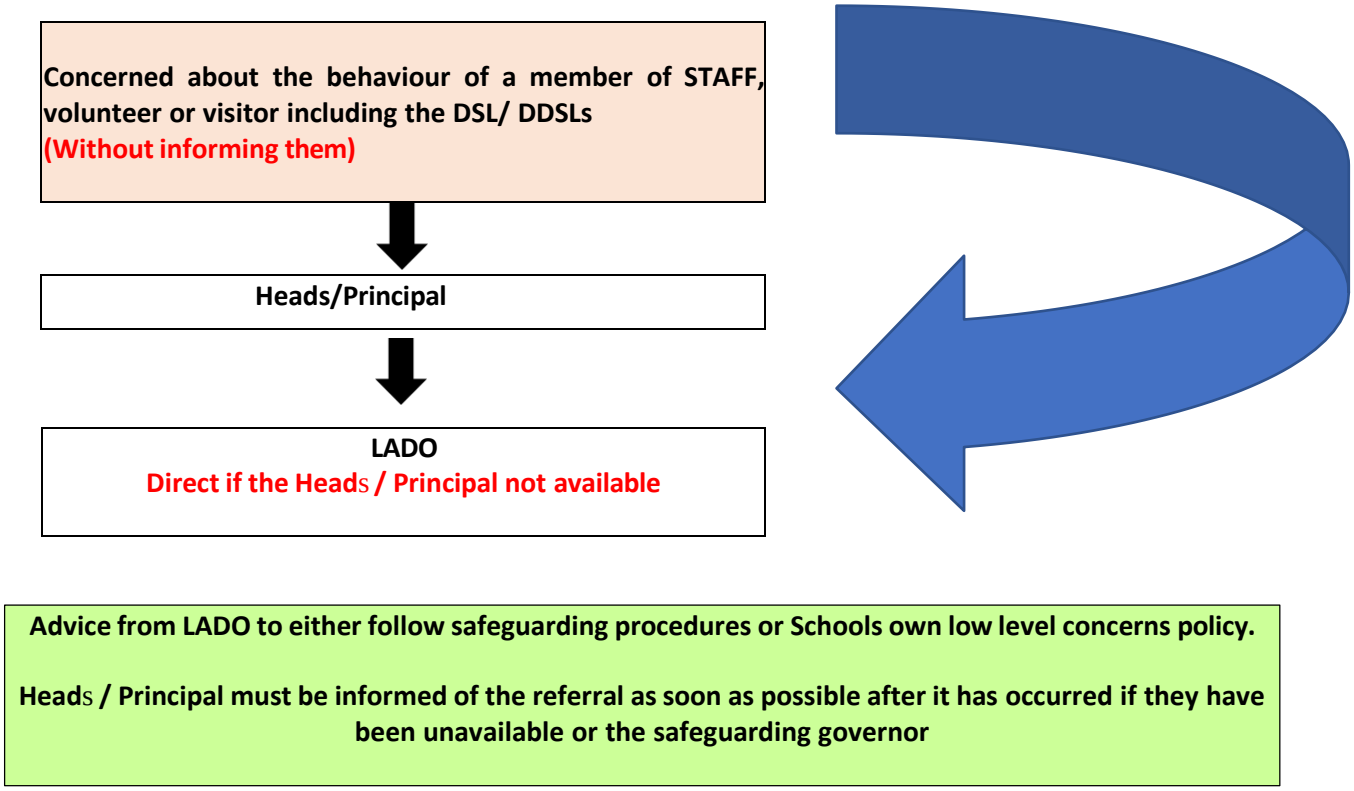
Principal
DSL

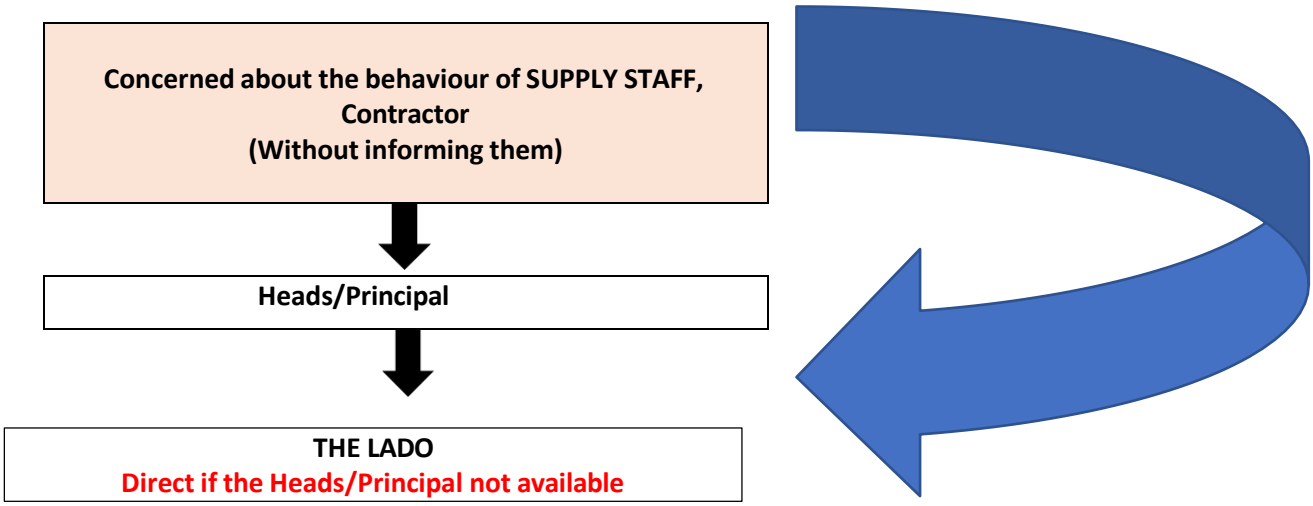
IF DSL, DDSL and Principal are ALL unavailable
Direct Referral without delay

↓

Please refer to appropriate Council's Safeguarding Contacts as per diagrams above

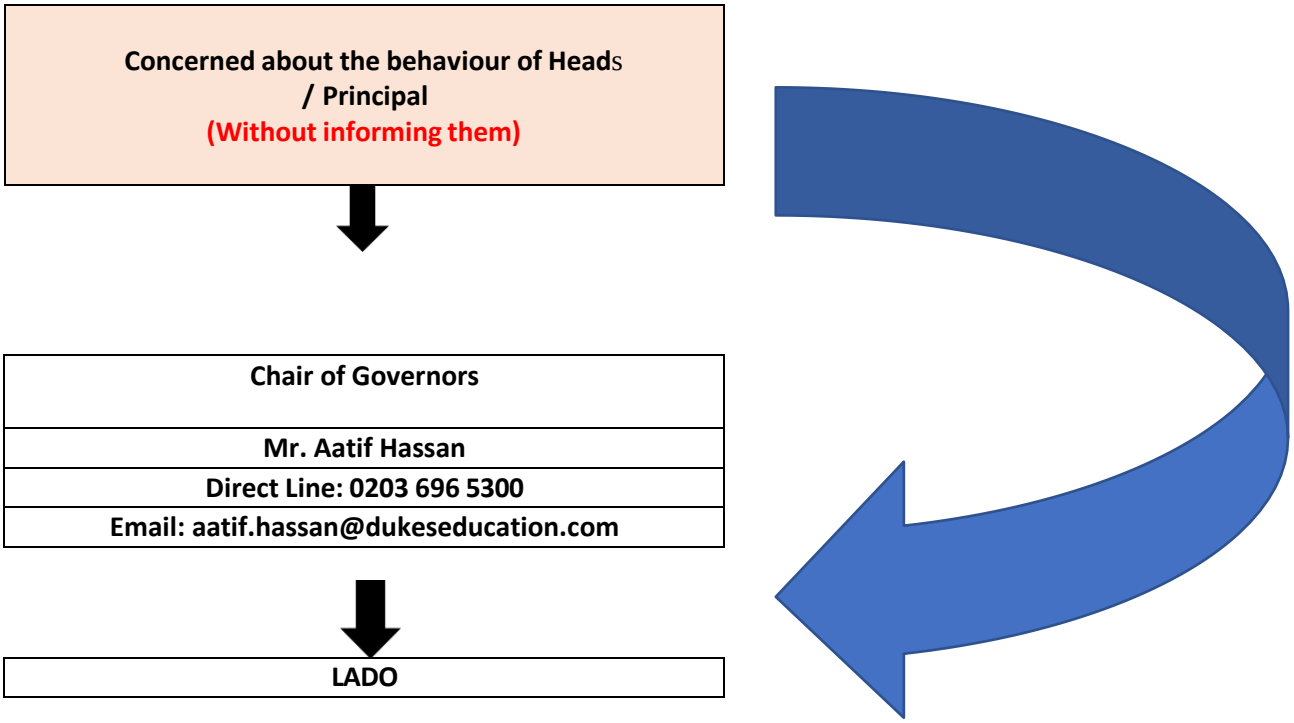

If you suspect or know that a crime may / has been committed
DSL
THE POLICE
Direct if DSL is not available
LADO can also be contacted if unable to get through to the POLICE


Concerned about the behaviour of a member of STAFF, volunteer or visitor including the DSL/ DDSLs
(Without informing them)
Heads/Principal
LADO
Direct if the Heads / Principal not available
Advice from LADO to either follow safeguarding procedures or Schools own low level concerns policy.
Heads / Principal must be informed of the referral as soon as possible after it has occurred if they have been unavailable or the safeguarding governor

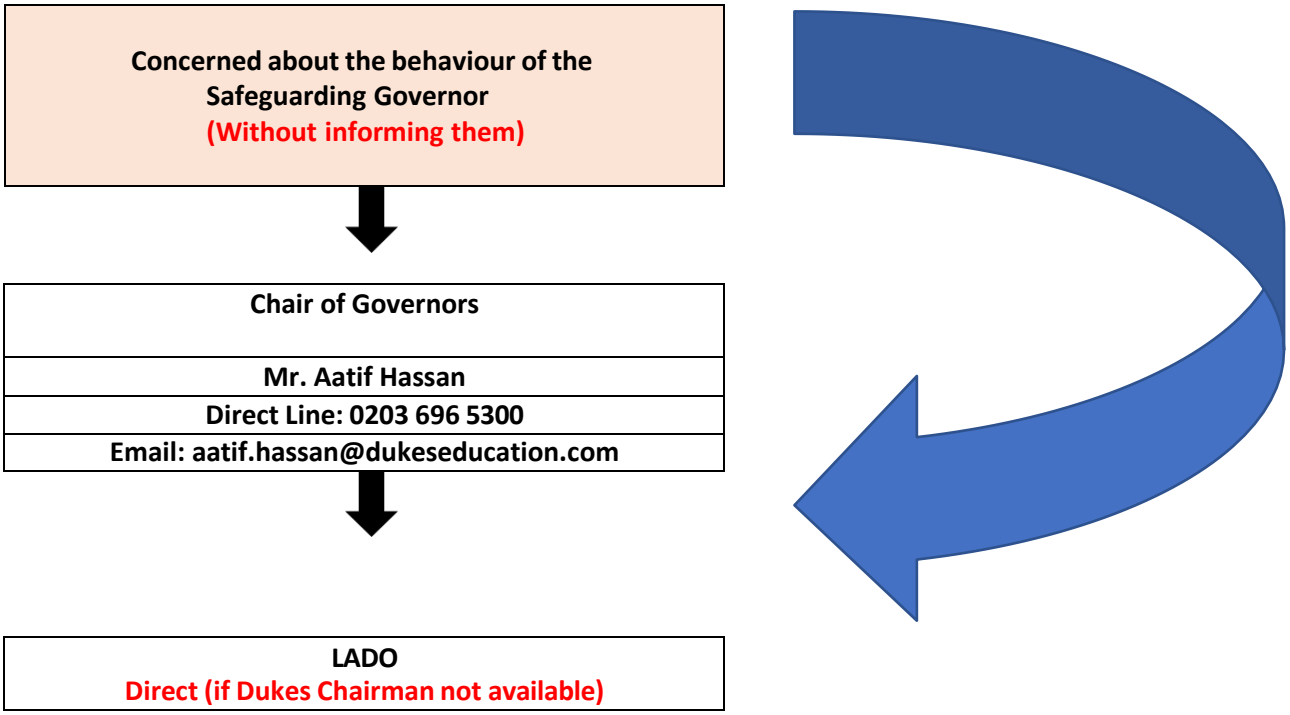


The Heads/Principal will also contact the proprietor of the Supply Agency or Contractor, after advice from the LADO

Advice from LADO to either follow safeguarding procedures or Eaton House Schools own low-level concerns policy



If the Chair of Governors is not available then Suzie Longstaff, Managing Director can be contacted in their role as Deputy Vice Chair of Governors.



In all cases, staff and parents are advised that phone contact will be the first point of communication to report any concerns.

Email communication is only to provide further detail if required and will not be used to believe any concern has been passed on.

If the person is not directly contacted and is unable to be found, then staff / parents will need to make further contact with key personnel on the flow charts or Children's Social Care Team and / or LADO directly.

Aims

The aims of this policy are:

- To ensure that effective safeguarding procedures are in place and are followed by all staff in accordance with national guidance and the locally agreed inter-agency procedures of Wandsworth Safeguarding Children's Partnership (WSCP) for Eaton House Manor Schools and Westminster's Access and Assessment Services team for Eaton House Belgravia.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, as well as support for those children.
- To identify, monitor and support those children who may be in need of Early Help including support from other agencies apart from Children's Services e.g., Child and Adolescent Mental Health Services (CAMHS)
- For all staff to be fully aware and confident of their role in safeguarding and child protection and of their responsibilities to identify and report possible concerns about the welfare of children, including possible harm or abuse
- For all staff to be fully aware of the need to report any concerns about the actions of members of staff, volunteers, visitors or contractors.
- To support children's development in ways that will foster security, confidence, and independence
- To be alert to the risks to young people online and to ensure, through appropriate filtering and monitoring systems, that they are safeguarded in the Eaton House Schools from potentially harmful and inappropriate online material. Also see ICT Acceptable Usage Policy
- To emphasise the need for good levels of communication between all members of staff
- To promote effective working relationships with other agencies
- To ensure that all staff are recruited in accordance with the Schools Recruitment Policy and in accordance with guidance in Keeping Children Safe in Education (September 2026) ("KCSIE") and Disqualification under the Childcare Act 2006 (September 2018)

Eaton House Schools will also create a positive ethos to:

- Establish and maintain an environment where all pupils feel secure, are encouraged to talk and are listened to
- Ensure staff are confident to report any concerns and to deal with any disclosures
- Provide early help to children and their families
- Have methods in place which make it easy for children to report concerns as well as ensuring that all children know they can talk to any adult in Eaton House Schools if they are worried
- Include opportunities in the curriculum for age appropriate personal, social, health and citizenship education (PSHCE) and Relationships & Sex and Health Education (RSHE) for pupils to develop the skills they need to recognise and stay safe from abuse, including abuse or exploitation through technology of all kinds

The Designated Safeguarding Lead

Eaton House Schools have appointed Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs), Some are members of the Senior Leadership Team and have the necessary status, training and authority to be responsible for matters relating to the welfare of pupils, including child protection.

In accordance with the Early Years Foundation Stage ("EYFS") statutory framework, the DSL is also responsible for safeguarding in relation to pupils within the EYFS.

Responsibilities of the DSL

The main responsibilities of the DSL are as detailed in KCSIE 2026 **Annex B**, but are also detailed below:

- To promote a culture of safeguarding so the welfare and best interests of children is embedded within all the Schools processes and procedures.
- To co-ordinate and monitor safeguarding, being the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies.
- The designated safeguarding lead should take lead responsibility for safeguarding and child protection.
- Immediately upon the receipt of any concerns, to act upon the report.
- To liaise with Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team, for Eaton House Belgravia and other neighbouring Children's Services departments.
- To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To ensure the safeguarding governor is informed about safeguarding concerns including any referrals.
- To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
- To be responsible for safeguarding and child protection procedures in the Eaton House Schools and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service.
- To provide a systematic means of monitoring and supporting children known or thought to be at risk of harm or where there are ongoing concerns.
- To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked after children.
- To maintain a regular training programme for all members of the Eaton House Schools staff and volunteers in line with advice from Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team for Eaton House Belgravia.
- To ensure all new staff (whether or not they work directly with children or not) receive induction training in safeguarding, understand their responsibilities and have received and read a copy of KCSIE Part 1.

- To ensure that all staff (whether or not they work directly with children or not) and governors have confirmed that they have been provided with, read and understood a copy of the Safeguarding Policy (i.e., this document) and KCSIE Part 1.
- To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- To ensure that when children or young people leave the Eaton House Schools that any child protection information is copied for the new educational provider within 5 days and transferred securely and separately from the main file.
- To have an understanding the importance of information sharing, both within the School and with other Schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.
- To ensure that a record of any safeguarding information is obtained from any previous school or nursery for a new pupil joining the schools.
- To monitor the confidentiality, keeping and storage of records in relation to safeguarding. The Eaton House Schools hard copy records on child protection are kept locked in the Head's/Principal's office and are separated from routine pupil records. Access is restricted to the Heads/Principal, DSL, and Deputy DSLs.
- To ensure the Safeguarding Policy is reviewed annually in conjunction with the Heads/Principal, and the Board of Governors/Proprietor, such review to include its effectiveness in practice
- To ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
- To be responsible for overseeing online safety in the school with the support of the Eaton House Schools IT manager. The DSL will have responsibility for child protection processes (including online safety and understanding the filtering and monitoring systems and processes in place). *This should be explicit in the role holder's job description*.
- To ensure the Safeguarding Policy is available to parents / carers, published on the Eaton House Schools website.
- To ensure that "Safeguarding" is a standing item on the agenda for, and minutes of, staff meetings. This is to ensure that all members of staff will be aware that there is a safeguarding concern about that child or young person, with detailed information only shared on a 'need to know' basis. It also provides those present with an opportunity to raise any general Schools safeguarding issues.
- To ensure a termly report is sent to the Safeguarding Governor and the annual Safeguarding Audit is presented to the Governing Board.
- Be aware of the requirement so that children investigated by the police whether the police are attending in School or interviewing the child at a police station, that an appropriate adult is present. www.safeguarding.link/pace. (Annexe B, KCSIE 2026).

- To act on promptly any information or reports from the police through Operation Encompass to ensure the right support processes are in place for any child / young person on roll at the Eaton House Schools, maintaining confidentiality throughout.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- Be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

The Deputy DSLs

The Deputy DSLs are trained to the same level as the DSL and in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

The ultimate lead responsibility for safeguarding and child protection rests with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

During term time, the DSL and/or the Deputy DSLs are available during School hours, either on site, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns.

The DSL and Deputy DSL(s) will undertake formal role-specific training at least every two years. This will include up-to-date information about local safeguarding partner arrangements, assessment and referral processes, Family Help, statutory intervention and relevant multi-agency procedures.

Responsibilities of the Staff

- To provide a safe and supportive learning environment.
- To read and understand, Part 1 of Keeping Children Safe in Education.
- To read and understand the Schools Safeguarding Policy and Procedures i.e. this document.
- To adhere to the Eaton House Schools Staff Code of Conduct.
- To undertake regular safeguarding training, at least annually.
- To be alert to the signs of abuse and neglect, including child-on-child abuse, and to report any concerns to the DSL immediately.
- To be aware that that even if there are no reports of child-on-child, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To help pupils understand how to keep themselves safe and manage risk.
- To be alert to absenteeism of any children and inform the DSL of any concerns.
- To consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding).

- To report to the Heads/Principal any concerns about the conduct of adults, including low level concerns (this includes behaviour outside Eaton House Schools that might indicate an individual is unsuitable to work with children)

Responsibilities of the Heads/Principal

To promote an overarching culture of safeguarding so the welfare of children is embedded within all the Eaton House Schools processes and procedures operating with the best interests of the child at their heart.

- To have read and understood all parts of Keeping Children Safe in Education thereby ensuring that the Eaton House Schools policy and procedures follow statutory guidance.
- To ensure that KCSIE Part 1 and the Eaton House Schools Safeguarding Policy are understood and implemented effectively by all staff, whether or not they directly work with children.
- To allocate sufficient time, training and resources to enable the DSL and Deputies to carry out their roles effectively.
- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the Eaton House Schools Whistleblowing procedures.
- To ensure pupils are taught about keeping safe, including online
- To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- To deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns.
- To seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults.
- To undertake training on safer recruitment processes at regular intervals
- To monitor the effectiveness of this policy and its procedures in liaison with the Safeguarding Governor and SLT and to remedy any deficiencies immediately.

Responsibilities of the Board of Governors and Proprietor

- To ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of pupils at their heart.
- To ensure they have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.
- To create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.
- To ensure policies, procedures and training in the schools are effective and comply with the law at all times.
- To ensure there is a nominated governor for safeguarding, who takes leadership responsibility at Board level for all safeguarding matters.
- To ensure the nominated governor has the required knowledge, skills and expertise to take leadership responsibility for the Eaton House Schools safeguarding arrangements.
- To ensure an appropriate senior member of staff, from the Eaton House Schools leadership team, is appointed to the role of designated safeguarding lead.
- To ensure there is an effective Safeguarding Policy in place, which is consistent with KCSIE (2026), Working together to safeguard children (2026) and the requirements of Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House The Manor Schools and Westminster's Access and Assessment Services team for Eaton House Belgravia.
- To ensure the policy is available publicly on the Schools website.
- To ensure child protection files are maintained (as detailed in Annex B of KCSIE 2026) , which show a clear chronology and the reason for decisions taken.
- To ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to, a Staff Code of Conduct, Anti-bullying Policy, Relationships & Sex Education Policy.
- To ensure that each Dukes organisation has a written behaviour policy and that is it made available to parents through a website or on request. The behaviour policy should take into account the guidance provided below:

Behaviour in Schools - Advice for headteachers and school staff Feb 2024

- To ensure there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout the Schools.
- To ensure that Eaton House Schools holds at least two emergency contact numbers for each child.
- To ensure that safer recruitment procedures are in place, embedded and effective followed in accordance with Part 3 of KCSIE and that all relevant checks are carried out on all staff before starting their employment and recorded in the Schools Single Central Record (SCR).
- To ensure IT systems have appropriate filters installed without unduly restricting access for educational purposes.
- As part of this process, the Board of Governors will ensure that Eaton House Schools undertakes regular monitoring of filtering systems in place (and formally reviewed at least once per academic

year by an SLT member, supported by the DSL and IT support on their effectiveness. This review will cover all internet-connected devices in relevant locations with clear records retained.

- The Board of Governors will be aware of their obligations under the data protection laws placed on our organisation and individuals to process personal information fairly and lawfully and to keep information held safe and secure. This will also include how external persons can or cannot access official information when requested to reduce the likelihood of data breaches and maintain adequate cyber-security systems in place.
- The Board of Governors should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The Governing Body will ensure there are policies and procedures in place regarding pupils accessing the internet in school. The Governing Body will be doing all that it reasonably can to limit children's exposure to the above risks from the Schools IT system. As part of this process, the Governing Body will ensure their school has appropriate filtering and monitoring systems in place and regularly review their effectiveness. The Governing body will consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
- To have policies and procedures in place relating to the use of cameras and technology within the EYFS.
- A review of the Safeguarding Policy at least annually (and in the case of a serious incident), including an update and review of the effectiveness of procedures and their implementation. The annual review of safeguarding forms part of the summer term Governors' Review Meeting. A termly report is sent to the Safeguarding Governor and the annual Safeguarding Audit is presented to the Governing Board by the DSL or the Head.
- Governing Bodies and proprietors should ensure that ALL governors and proprietors receive appropriate safeguarding and child protection (including online) training at induction. This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole Eaton House Schools approach to safeguarding. Their training should be regularly updated.
- Governing bodies and proprietors should ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to *filtering and monitoring* at induction. The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners.
- The Proprietor and the Board of Governors will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their multi-agency safeguarding arrangements.

Governors of independent schools as non-public entities however do not have to follow requirement as laid down in the Public Sector Equality Duty (PSED). (KCSIE 2026)

Children with Special Educational Needs and Disabilities (SEND), or Pupil with Certain Health Conditions

Staff are made aware that children with special educational needs and/or disabilities as well as other vulnerable groups may be especially at risk of abuse including those with physical health issues. Such children are also more prone to peer group isolation or bullying.

Staff will be aware that:

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

Any reports of abuse involving children with SEND will require close liaison with the DSL (or deputy) and the SENCO or the named person with oversight for SEND in our schools.

We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

SEND children who are placed with alternative provision providers will be regularly monitored to ensure their whereabouts and levels of attendance are known. The suitability checks of staff and premises will be undertaken before any placement commences.

Half-termly reviews will be undertaken to ensure suitable academic progress is being made, the quality of education delivery is maintained, and acceptable levels of attendance are met.

What to do when there are concerns or if a child makes a disclosure

It is important that children receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- Identify and refer any concerns about a child
- Keep clear written records
- Listen to the views of the child
- Reassess concerns if the child's situation does not improve
- Share information quickly and challenge inaction

Staff see children regularly and know them well, so are in a unique position to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive.

Staff should be aware that younger pupils may also talk about, or demonstrate behaviour, through their play which may give rise to safeguarding concerns.

Concerns may also be raised about a parent/carers interaction with a pupil or issues such as parental alcohol misuse, domestic abuse, or mental health. If there is any concern at all the incidents must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.

Appendix 1 of this policy give details of some of the types of abuse and safeguarding issues with which staff should be familiar.

Procedures if staff have a concern about a pupil

- If a member of staff is concerned about a pupil the matter should be referred immediately to the DSL, or the Deputy in the DSLs absence.
- Staff may speak directly to the DSL or Deputy DSL first to discuss their concerns about a pupil or may enter their concern straight on to CPOMS (the Schools management system for safeguarding) for attention by the DSL.
- In either case, reporting a concern must not be delayed and must be reported as soon as possible and no later than the same working day. (also see later section on recording concerns
- The Heads and Principal will ensure cover arrangements would be in place if the DSL or DDSLs were absent for any reason such as illness, holiday or any other circumstance.)
- In all instances, a written record must be made by the member of staff on CPOMS, which all staff have access to.
- Any member of staff who cannot access CPOMS for any reason must always contact the DSL directly, and without delay.

Procedures for staff if a pupil discloses information

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

The member of staff should:

- Listen carefully and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. When the pupil has finished talking, make sure that he/she feels secure and, if appropriate, explain what you are going to do next.
- Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim will never be given the impression by our staff that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Our staff will explain that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them. (KCSIE 2026).
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. (KCSIE 2026).
- Do not promise confidentiality. Explain that you have to make sure that the pupil is safe, and you will need to ask other adults to help you to do this.
- Do not cross question the pupil. You must not ask leading questions, that is, a question which suggests its own answer. Let the pupil tell you what he or she wants to and no more. The pupil may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- Be prepared to follow up with the pupil, but only in conjunction with advice from the DSL.
- Be aware that younger pupils may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury, even if requested by a parent / carer so they can show to their child's doctor. It may be possible to observe the pupil during the normal school routine, for example in a physical education (PE) class.
- If a pupil wants to show you his or her injuries, please try and insist that this must wait for a health professional to make an assessment. No child or pupil should be asked to undress to show their injuries to a member of staff.
- Do not attempt to investigate matters further; your role is to listen, record and report your concerns to the DSL.

If a concern or disclosure involves technology or online images staff must follow the specific advice in this policy.

Mechanisms for Pupils to Report Concerns

The School has a strong pastoral system and promotes an ethos where pupils feel safe to share information about anything that is worrying them.

The DSL should consider informing parents or carers to also support the child's wellbeing, provided doing so would not expose the child to additional risk.

The School Council provides a 'pupil voice' and encourages pupils to develop the rules and boundaries of acceptable behaviour.

Pupils are encouraged to use the 'worry boxes', tell someone and have emotional check ins during class to share any concerns that they may have. The boxes are checked at least weekly, and well-being lead teachers address these concerns with the children.

There is an annual pupil survey conducted and results carefully considered.

There are posters around school saying who pupils can talk to and children are reminded regularly in assemblies and PSHE lessons on who they can speak to and that we are all here to help.

Support for Staff

Eaton House Schools recognises that staff who have become involved with a pupil who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

Eaton House Schools will support such staff by providing an opportunity to talk through their anxieties with the DSL and will seek further support as appropriate.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school. Staff can call 0800 028 0285 or email help@nspcc.org

Recording Safeguarding Concerns

Abuse and neglect are complex issues and are rarely standalone events; therefore, they require a culture of vigilance, professional insight, and respectful challenge, as well as effective recording, reporting and monitoring systems.

- All staff have an appropriate level of access to CPOMS which enables them to record concerns. The DSL and Deputy DSL have full access to enable them to record actions and store all safeguarding records securely.
- All safeguarding concerns must be recorded on CPOMS, the Schools management system for safeguarding.
- If the DSL is not available for any reason the Deputy DSLs must be contacted to deal with the concern initially.
- With regard to any conversations directly with a pupil or overheard, staff must keep a written record of the conversation and concerns arising.
- The record should include the date, time, and place of the conversation, who was present and

what was said by the pupil. The record should use names, not initials, for all references to people.

- The record should be specific. Record actual behaviour and language used by a pupil rather than more vague terms such as inappropriate language/behaviour.
- Staff should make the record as soon as possible after speaking to the pupil so the pupil is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the pupil's own words.
- The record should contain facts and information only, taking care to avoid personal opinion.
- Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.
- If more than one member of staff is present when a pupil discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report on CPOMS.
- The report must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.
- It is important to record all concerns regarding the welfare of pupils, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.
- Staff must not investigate further or speak to parents or other staff. They must contact the DSL who will then determine the next course of action.

DSL Action on Receipt of a Concern About a Child

On receipt of the safeguarding report, the DSL must record the decisions made and action taken.

Action will depend on the nature of the concern. It may include one or more of

the following:

- monitoring the pupil in school
- a discussion with parents
- early help intervention from the school and/or another agency
- referral to Children's Services
- referral to the LADO
- report to the police

The member(s) of staff making the report will be informed by the DSL of the action taken.

If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

Preserving Evidence

- All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.

- If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as to do so is a criminal offence.
- If the imagery has already been viewed by accident (e.g., if a pupil has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- Do not delete the imagery or ask the pupil to delete it.
- Do not ask the pupil(s) involved in the incident to disclose information regarding the imagery.
- Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any pupil(s) involved.
- Do explain that you need to report it and reassure them that they will receive support and help.
- Report the matter to the DSL immediately

Also see DfE Searching Screening and Confiscation Advice for schools and the UKCIS Education Group Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of nudes and semi-nudes being shared.

Child Protection Records

- Safeguarding records are kept securely on **CPOMS.**
- Written records are kept of all concerns, whether or not there is a need to refer the matter to Children's Services or another agency.
- There is a clear, detailed chronological summary for each pupil where concerns have been raised and a detail note of any action taken, decisions reached, outcome and how the concerns was followed up.
- If a referral to Children's Services is thought to be required, the DSL will usually contact the local authority for advice prior to notifying parents.
- All discussions with the local authority along with the decisions made and the reasons for those decisions are recorded in writing on **CPOMS.**
- The Wandsworth and Westminster's Social Communication Pathway (SCP) have their own referral forms which must be completed if a formal referral is made by the DSL. A copy of the referral form sent to the local authority must be retained.
- Minutes of any case conferences or discussions with social workers or other professionals involved with the pupil will be stored on **CPOMS**.
- Any new concern or information about a pupil who has active involvement with Children's Services must be passed to the pupil's allocated social worker without delay.
- Any new concern or information about a pupil who has had previous involvement with Children's Services must be passed to Children's Services without delay.
- If a pupil moves to another school, all child protection records are transferred securely, as soon as possible (within 5 days for an in-year transfer or within first 5 days of the start of a new term) to the DSL at the new school and a receipt is obtained confirming they have been received.
- Parental permission is not required for records to be shared with the new school.

- On a case-by-case basis the DSL will also consider sharing information proactively with the new school to ensure key staff are aware of the pupil's needs and can have any support in place when the pupil arrives.
- Safeguarding records will be requested from previous schools/nurseries for any new pupils joining the school.

Information Sharing

Information will be shared according to Information Sharing Duty: Statutory guidance for safeguarding organisations and their practitioners.

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

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. 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. (KCSIE 2026).

The guidance states that practitioners should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.

When deciding what information to share, staff should consider:

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

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

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

and, gaining consent would place a child at risk

- not providing pupils' personal data where the serious harm test is met.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services supports staff who have to make decisions about sharing information.

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

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

All information-sharing decisions will be recorded, including:

- what information was shared or withheld;
- with whom it was shared;
- the reason for the decision;
- the lawful basis relied upon, where relevant; and
- the outcome or action agreed.

This includes recording the rationale where a referral to another agency was considered but not made.

Where information indicates a risk to the child or others, including previous knife or weapon concerns, we will advise the receiving school to assess the risk of that child and put a safety and support plan in place for them.

Further information and guidance on data protection can be found at:

Data protection in schools - Guidance - GOV.UK

Practitioners may share information, without consent when there is a good reason to do so, and the sharing of that information will enhance the safeguarding of that child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent and if to gain consent would place a child at risk. (KCSIE 2026).

Communication with Parents/Carers

- All parents are aware from the Schools Parents' Handbook and publication of this policy on the Schools website that the school has a safeguarding policy and is required to follow statutory guidance in respect of reporting to Children's Services any case of suspected abuse.
- From this policy and from notices in the school buildings, parents are made aware of the identities of the DSL and Deputy DSL with whom they may discuss concerns.
- Eaton House Schools will work with parents and outside agencies to help support pupils and their families; however, it will always put the duty of care to the child as its priority and will refer concerns if it considers a pupil is or may be at risk of harm or has suffered harm.
- The DSL will normally request a meeting with the parents of the pupil about whom there are concerns to discuss the matter. They will explain the reasons for the Schools concerns and the course of action the school intends to take.
- Referrals to Children's Services or the LADO (or initial advice from either service) do not require prior parental consent. The DSL must act in in the best interests of the pupil, even if this results in making a referral against the parents' wishes.
- If the DSL believes that notifying parents might in any way exacerbate the problem, increase the risk to the pupil or if there are any other extenuating circumstances, initial advice will be sought from Children's Services prior to notifying the parents. This may result in an immediate referral to Children's Services without parents being notified.
- If there is an allegation which involves a member of staff, parents will only be informed after the school has consulted with the LADO and has obtained the LADO's consent.
- If a parent has any safeguarding concerns, he/she should contact the Schools DSL as soon as possible.

Referrals to Children's Services and/or Other Agencies

Referrals about an individual pupil must be made to the borough in which the pupil resides. However, advice may always be obtained from the Children's Services department of the Schools local authority, regardless of the where the pupil resides.

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

The DSL follows the Levels of Need thresholds (sometimes named as the continuum of need threshold document) from Wandsworth Safeguarding Children's Partnership (WSCP) for Eaton House Manor Schools, and Westminster's Access and Assessment Services team for Eaton House Belgravia when decisions are made about making referrals.

Available here:

Wandsworth: Levels of Need Framework 2023 (wscp.org.uk)

(Neighbouring London authorities also use these London wide thresholds, should a pupil not reside within Wandsworth.)

There are 4 levels.

1. Universal services
2. Child in need of Early Help/Targeted Support (Early Help Assessment)
3. Child in need (Referral to MASH)
4. Child at risk of significant harm, Child Protection and Specialist Support (Urgent referral to MASH)

Eaton House Schools will ensure as a relevant agency that it should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as a part of "local arrangements".

Local authorities and partners are required to develop and publish protocols identifying who may lead assessments and how cases will be managed following referral.

Our DSL / DDSLs will be familiar with Wandsworth Council's local threshold document and Chelsea and Westminster Council's local threshold document.

Universal Services and Community Based Early Help

Providing help and support as soon as problems emerge is an important part of safeguarding children and promoting their welfare at any point in a child's life.

Where a child would benefit from coordinated early help, an early help inter-agency assessment will be arranged. Chapter 1 of DfE Working Together to Safeguard Children (March 2026) provides detailed guidance on the early help process.

Universal services and community-based Early Help provide support at an early stage, before statutory intervention is required. Support may be delivered through education, health services, family hubs, youth services, housing services and voluntary or community organisations.

Additional support systems in school may form part of early help strategies and should feed into Local Authority early help measures as required. This may be from the pastoral team, school mentors or support from a school counsellor.

Evidence MUST be kept of all early help interventions.

The DSL and Deputy DSL(s) will understand the local Early Help arrangements, threshold document and referral pathways and will ensure that staff know how to identify children and families who may benefit from additional support.

Where appropriate, Eaton House School will work with the child, their parents or carers and relevant agencies

to:

a. identify the child's needs and any emerging safeguarding concerns;
b. consider the child's wishes and feelings;
c. agree the support required and the outcomes to be achieved;
d. coordinate services through an identified lead practitioner where appropriate; and
e. regularly review whether the support is improving the child's circumstances.

Some children and families may require more targeted support than that available through universal or community-based Early Help. Family Help includes:

a. targeted early help coordinated by the local authority and its partners; and
b. statutory support and services for children in need under ***section 17 of the Children Act 1989.***

Targeted early help is a voluntary arrangement and will ordinarily require the consent and participation of the child and their family.

An appropriately qualified practitioner may lead the assessment and coordinate the Family Help plan. Where local arrangements permit, the same practitioner or a qualified non -social work lead practitioner may continue to work with the family, where locally agreed, if the child is subsequently assessed as a child in need under section 17.

Where a child or family does not consent to targeted early help, or does not engage with the support offered, the DSL will consider whether the child's needs are likely to increase or whether there is a safeguarding risk that requires referral to local authority children's social care.

Family Help and Early Help cases will be kept under regular review. Where the child's circumstances do not improve, the support is not meeting their needs or concerns increase, the DSL will consider whether the matter should be escalated or referred for statutory assessment.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral will be made immediately to local authority children's social care under section 47 of the Children Act 1989 and, where appropriate, to the police.

The School will also understand and follow the local criteria and procedures relating to:

- Section 20 of the Children Act 1989, concerning the local authority's duty to accommodate / provide safe accommodation for a child. This can also be used for short breaks care.
- Section 31 of the Children Act 1989, concerning care and supervision orders;
- disabled children;
- children managed within the **youth secure estate**; and
- children affected by abuse, neglect, exploitation, trafficking or modern slavery.

We will support children's social care and other agencies with assessments and multi-agency plans. All concerns, discussions, decisions and the reasons for those decisions will be clearly recorded.

Any pupil may benefit from early help, but KCSIE recommends that all staff should be particularly alert to the potential need for early help for a pupil who:

a. is disabled and has specific additional needs
b. has special educational needs (whether or not they have a statutory education, health and care plan)
c. is a young carer
d. is frequently missing/goes missing from care or home
e. is misusing drugs or alcohol

f. is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
g. has returned home to their family from care.
h. are pregnant or parents themselves.
i. exhibit early abusive, violent or harmful behaviour.
j. have been repeatedly removed from classrooms.
k. are on part-time timetables.
l. face financial exploitation.
m. are at risk of faith-based as well as honour-based abuse; or
n. are otherwise experiencing disrupted education.

Form teachers through PSHE and form periods ensure that pupils are aware that staff are available to listen and provide additional in-school support if necessary.

Our **organisation** also has access to other counselling and support services if needed.

Staff will be trained to be able to identify children who:

(i) Would benefit from early help.
(ii) Have unexplained or persistent absence from education.

Wandsworth Council (and other London boroughs) Threshold Levels 3 and 4

- Pupils who meet the threshold of Level 3 or Level 4 will be referred to MASH immediately by the DSL.
- If there is ever any doubt about whether a referral should be made advice will be sought from the Wandsworth and Westminster Safeguarding Advisors or from the MASH team.
- The DSL may also take initial advice and discuss matters with other services such as the Education Welfare Officer, CAMHS or the police. Under no circumstances will the situation be left beyond the day that the concern is first raised.
- If a referral is made or advice is obtained from Children's Services, the safeguarding governor will be informed of the case by the DSL as soon as possible.
- All telephone conversations with Children's Services, the LADO or other local authority officers are recorded by the DSL on CPOMS.
- The DSL will discuss the concerns with the pupil's parents/carers at the earliest appropriate opportunity.
- The DSL will assist other agencies to make enquiries into concerns about a pupil's welfare. This will include ensuring that the school is represented at multi-agency meetings, including child protection conferences, and that reports/information about the pupil are provided as required.
- In cases of extreme emergency or if a serious criminal offence appears to have been committed **the police will be contacted immediately.**
- The referral process outlined is also followed when there are concerns about a pupil who may be at risk of radicalisation. The level of risk will identify the most appropriate referral, which could include Children's Services and/or **Channel.**

(Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.)

The policy of the school requires that all referrals are made by the Schools DSL; however, **anybody can make a referral** and in exceptional circumstances staff may raise concerns directly with Children's Services.

If, at any point, there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services or the police on 999 immediately.

Safer Recruitment

The school follows statutory guidance for the safer recruitment and employment of staff who work with children as set out in Part Three of KCSIE and Disqualification under the Childcare Act 2006. Please also see our *Selection, recruitment and Disclosure Policy*.

All staff are checked as to their suitability. These checks include

a) The taking up of references
b) Verification of identity
c) Verification of right to work in the UK
d) Where appropriate, verification of qualifications
e) Where appropriate, overseas police checks
f) (A satisfactory enhanced check with the Disclosure & Barring Service (DBS), including a Barred List check for staff engaged in regulated activity
g) A self-declaration to ensure compliance with disqualification regulations made under the Childcare Act 2006
h) For teachers, verification of Qualified Teacher Status (QTS), and the completion of teacher induction or probation.
i) For staff engaged in teaching duties, a check that the teacher is not subject to a prohibition order issued by the Secretary of State.
   Checks for h) and I) can be completed at: Check a teacher's record - GOV.UK
j) Where appropriate, a check that there is no teacher prohibition order issued by any overseas professional authority
   Further guidance can be found at: Criminal records checks for overseas applicants - GOV.UK
k) Where appropriate, an overseas criminal record check(s)
l) Where appropriate, a check to ensure the person is not barred from taking part in the management of an independent school – also known as a Section 128 / S128, using the link: Individuals prohibited from managing or governing schools - GOV.UK
m) A medical fitness questionnaire and / or medical self-declaration.

Staff involved in recruitment receive appropriate training in safer recruitment.

In addition, as part of the shortlisting process our schools **will carry out** an **online search** as part of their due diligence on any shortlisted candidates.

This may help identify any incidents or issues that have happened, and are publicly available online, which the schools might want to explore with the applicant at interview.

Our human resources department will make known of this due diligence by placing this intention to research publicly available online material within the advert, candidate pack and application from so that it is well known before any short-listing takes place that this will occur.

Safer recruitment – Contractors and Self-Employed Staff

Our organisation will always ensure a service level agreement is in place to ensure expectations on both sides are known including the requirement for undertaking safer recruitment checks.

We will ensure that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check so long as it is compliant with KCSIE 2026.

Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).

For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required.

Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children. Where contractors attend the site outside of term time and no young people are present then supervision may be deemed as not required.

Self-Employed Persons

HR team will decide either to obtain the DBS check, or request to see the certificate if the self-employed person has obtained their own check and ensure that the DBS check is at the level required by the school.

Where using a third party / employment agency, the HR team will ensure a DBS with barred list information is obtained for those engaging in regulated activity.

We will still check the identity of contractors on arrival at the school.

Safer recruitment – Governors

The majority of our governors are also serving Managing Directors or Directors employed centrally by Dukes Education and therefore operate a model of "professional governance".

Appropriate recruitment checks will be undertaken as standard for anyone appointed to the management role with Dukes Education to ensure that they are fit and proper to be part of the leadership and management. Dukes Education will provide a letter of assurance to our organisation that all suitability checks have been carried out prior to commencement of their governor role. Our organisation will further check Identity and DBS (enhanced with barred if applicable) prior to their first governor meeting.

Safer Recruitment: Visitors and Visiting Speakers

There are a range of visitors who attend our establishment at different times during the academic year.

These include professionals such as educational psychologists, social workers, and other

education-related practitioners, as well as educational visitors like guest speakers

or performers.

Eaton House School may host individuals connected to the site, including contractors working on the

building or grounds, children's family members, or others attending school events such as sports days.

Will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day.

The Heads/Principal will use their professional judgement about the need to escort or supervise such visitors and will inform relevant staff accordingly.

For visitors who are there in a professional capacity, it is required that their identity is checked and gain assurance that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks).

We are not ask to see the certificate in these circumstances but if required under a service level agreement then details will be logged. Where a visitor will have no contact with children, it is unlikely that a DBS check will be required.

Staff Recruitment: Volunteers

All volunteer roles will be assessed before the individual begins work. The Head in liaison with the HR team and DSL will determine whether the role amounts to regulated activity and what checks are required.

From 1st September 2026, a volunteer who teaches, trains, instructs or supervises children frequently, on more than three days in any 30-day period, or overnight, will be regarded as engaging in regulated activity, even where they are supervised (KCSIE 2026).

In these circumstances, an enhanced DBS check with Children's Barred-List information will be obtained before the volunteer begins the role.

A volunteer will not undertake regulated activity until their Children's Barred-List status has been confirmed this includes volunteers who are moving from non-regulated to regulated activity roles.

Our organisation will review the roles of existing volunteers to identify any individual who becomes engaged in regulated activity because of the changes introduced from 1 September 2026. Where this applies, we will check the individual's Children's Barred-List status and obtain the appropriate DBS check.

Where a volunteer is not engaged in regulated activity (less than 3 days in any 30-day period) we will undertake and record a written risk assessment to determine what checks, if any, are appropriate.

The assessment will take account of:

- the nature of the work with children.
- the level and frequency of contact with children.
- what is known about the volunteer, including information provided by staff, parents, referees or other volunteers.
- whether the individual undertakes other paid or voluntary work where a referee can comment on their suitability; and
- whether an enhanced DBS check without barred-list information, or another level of check, is appropriate.

Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or permitted to undertake regulated activity.

Where the statutory criteria are met and there are safeguarding concerns, the Heads/Principal will

make a referral to the Disclosure and Barring Service as soon as possible in relation to a volunteer who is removed from regulated activity (dismissal, redeployment outside regulated activity or suspension), or who ceases volunteering before they can be removed or resignation.

Visiting Speakers

Visiting speakers are always vetted and staff must obtain permission from the Heads/Principal for any speakers to visit the schools.

On arrival, photographic evidence will be asked to check their identification and they will be asked to sign in the signing in book in reception. As they will be always supervised, a DBS or barred list check will not be required, unless it is deemed, they may be undertaking regulated activity.

Information on any online research undertaken, references received (written or verbal on their suitability) etc. must be collated in the Eaton House Schools visitor log which must be a separate document from the signing in book at reception.

This log will contain date of visit, company name, person's name, purpose of visit, visit approved by and risk assessment checked if activity being undertaken requires a review.

Suitable online research might include a review of the visiting speaker's website or company information held at companies house, news articles of their visits to other organisations, comments made on www.mums.net and should be limited to the suitability of them to present / undertaken tasks to children / pupils in the nursery / school.

Verbal references from other educational establishments or persons known to the visiting speaker will also be recorded in the visiting speaker's log / file.

A review of the presentation or workshop material planned to be delivered will be undertaken to ensure it is stage and age appropriate and does not contain any disinformation or misinformation (including Fake news and conspiracy theories).

Staff Induction

The DSL is responsible for ensuring that all new members of staff working in the schools, and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training will take place prior to the new member of staff starting work with the children.

All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:

- Keeping Children Safe in Education, Part 1
- The identities and roles of the DSL and DDSL safeguarding team, including safeguarding governor.
- Safeguarding Policy and a copy of KCSIE 2026 Part one
- Staff Code of Conduct
- ICT Acceptable Usage Policy.
- Sharing of Concerns (Whistleblowing) Policy
- Low Level Concerns Policy

- Allergy Management Policy
- Pupil Behaviour, Discipline and Exclusions Policy
- Anti-bullying Policy
- Prevent training
- Procedures on managing children who are absent from education / go missing from education (in Attendance Policy)
- How to report concerns through CPOMS

Eaton House Schools takes a risk-based approach to the level of information provided when training other temporary staff, staff running clubs, contractors and volunteers.

Staff Training

- All staff are required to read, at least annually, the Safeguarding Policy (i.e. this policy) and the Staff Code of Conduct and must confirm that they have done so.
- All staff (whether directly working with young people or not) are required to read and understood the guidance for staff in Part 1 of KCSIE and confirm that they have done so.
- Every member of staff receives comprehensive level 2 training in safeguarding (including on-line safety) at least **every two years**. Refresher training is provided annually at the start of the academic year and on specific issues through the year as required.
- Staff will also receive regular informal updates on safeguarding and child protection (including online safety) / related issues as and when required through bulletins, INSET training and staff meeting announcements from the DSL or if local circumstances warrant. This could also include updates via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff are trained in how to listen, respond to and report any disclosures including those which involve **child-on-child** sexual violence or sexual harassment misogyny serious violence and those incidences involving weapons.
- All staff will have training on child protection (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This training should be regularly updated and will ensure that staff understand the current IT provision in place, manage them effectively and know how to escalate concerns when identified.
- Induction training for staff will be in line with any advice from the organisations safeguarding partners.

DSL and DDSLs Training

The DSL and Deputy DSL(s) will undertake formal role-specific training at least every two years. This will include up-to-date information about local safeguarding partner arrangements, assessment and referral processes, Family Help, statutory intervention and relevant multi-agency procedures.

Governor Training

The Board of Governors will ensure that **all** governors and proprietors receive appropriate safeguarding and child protection (including online) training at induction.

This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole Eaton House Schools approach to safeguarding. Their training will be regularly updated.

The governor responsible for safeguarding has received safeguarding training specifically for governors and undertakes refresher training **every two years, as a minimum**.

Acceptable Use of Technology – (including in the EYFS)

(Also see ICT Acceptable Usage Policy)

- Staff must not take video footage or photographs of pupils except for Eaton House Schools purposes.
- Any such images must not be placed in the public domain without the permission of the Heads/Principal.
- Eaton House Schools devices should be used wherever possible.
- If a personal device is used, photographs or videos of pupils must not be stored or retained on personal cameras, mobile phones, or other electronic devices with imaging and sharing capabilities. Any images must be uploaded to the Eaton House Schools server as soon as possible and permanently deleted from the personal device.
- Permitted images are stored securely on a password-protected section of the school intranet. They are deleted when no longer required.
- Cameras, mobile phones, or other electronic devices with imaging and sharing capabilities and photographic devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause upset.
- Parents / carers are asked to restrict photography whether on cameras, mobile phones, or other electronic devices with imaging and sharing capabilities to major school events published in the school calendar only. General filming in the Eaton House Schools by parents / carers is never permitted.
- Parents / carers should be aware that other parents in the Eaton House Schools may object to photographs being taken which, inadvertently or otherwise, include their child; therefore, any images taken must be for personal use only and should not be shared on social media.
- Other visitors, volunteers and contractors in Eaton House Schools are not permitted to take photographs in any area of the school without specific permission from the Head.
- The general use of mobile telephones in all areas of Eaton House Schools (calls, texting and email) by parents is not permitted.
- Staff may only communicate with pupils through Eaton House Schools email system and the designated apps used by older pupils for homework.
- Staff must not use their mobile phones or other personal devises for calls or messaging when

engaged with pupils and all devices must be out of sight.

Filtering and Monitoring Systems

The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty (2023).

https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually by a member of the senior leadership team supported by the DSL and IT department across all internet-connected devices and relevant locations ensuring accurate records kept of the process.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs Governing bodies and proprietors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.
- Use the department's plan technology for your school service to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

Our organisation will ensure that our leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

Our Governing Body will consider the number of and age range of our children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

Further advice can be found at:

Appropriate Filtering and Monitoring - UK Safer Internet Centre

Reviewing online safety

Technology, and risks and harms related to it, evolve, and change rapidly. Our organisation will consider carrying out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our young people face including the use of Artificial Intelligence (AI).

Further guidance on the product safety expectations of AI in educational settings can be found at:

Generative AI: product safety expectations - GOV.UK

Information security and access management

Our organisation is directly responsible for ensuring we have the appropriate level of security protection procedures in place in order to safeguard our systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We take into account the guidance on e-security is from the National Education Network.

Where possible, we will consider meeting the Cyber security standards for schools and colleges.
Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK

Our named Governor for ICT is: Suzie Longstaff
Our Senior Leader Team member responsible for implementing the DFE Digital Standards is: Liam Corbett

Broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff:

https://NCSC.GOV.UK

Online Safety

Online safety policy (please also see our separate Online Safety Policy)

Our approach to online safety is reflected in this safeguarding policy, which includes appropriate filtering and monitoring on school devices and school networks.

Considering the 4Cs (below) provides the basis of an effective online policy for our organisation which covers:

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

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, fake pornographic images racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism misinformation, disinformation (including fake news) and conspiracy theories.

Further guidance can be found at:
https://pearsfoundation.org.uk/partners/the-commission-into-countering-online-conspiracy-in-schools/

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography/ fake pornographic images, sharing other explicit images and online

bullying, and spreading / publishing disinformation / misinformation to others online.

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our pupils, students or staff are at risk, then we will seek advice from the Anti-Phishing Working Group which can be found at: https://apwg.org/

Staff Code of Conduct

The Staff Code of Conduct gives comprehensive, clear guidance on the expected behaviour of **all adults** in the school. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by pupils or others and report any conduct by an adult which raises concern. Failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken.

Please refer to the separate Staff Behaviour Safeguarding (Code of Conduct) Policy.

Whistleblowing

It is recognised that pupils cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, which may include the attitude or actions of colleagues. All members of the school community have a duty to protect children and should they have concerns must make these concerns known to the Heads/Principal.

Please also see our Sharing Concerns (Whistleblowing) Policy as well as advice on low-level concerns.

Allegations Against Staff

As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in Eaton House Schools (including self-employed staff, supply teachers, trainee teachers, volunteers and contractors).

All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner at all times, both to ensure the safety of the pupils, and to reduce the risk of any allegation of improper behaviour.

If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, Eaton House Schools will follow the guidance in part four of KCSIE and the procedures of Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team for Eaton House Belgravia.

Allegations that might indicate that a person is unsuitable to work with children are where a person has:

- Behaved in a way that has harmed a child or may have harmed a child and/or:
- Possibly committed a criminal offence against or related to a child and/or:
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or:

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The following procedures relate to all members of all staff, (including the self-employed, supply staff and contractors) governors and volunteers or any other adults who are currently working in the schools, regardless of whether the schools, is where the abuse is alleged to have taken place and regardless of whether it involves pupils at these schools.

Please note that all other concerns about members of staff should be reported through the organisation's Sharing of Concerns (Whistleblowing) Policy and Low-Level Concerns Policy.

If in any doubt, please speak with the Heads/Principal in the first instance.

Reporting an Allegation or Concern

- Staff must never think that abuse by an adult is not possible in these schools, or immediately disbelieve an accusation against someone who is known well and trusted.
- A member of staff receiving an allegation of abuse by another member of staff, or with concerns about another member of staff, should report this immediately to the Heads/Principal, unless the Heads/Principal, is the one against whom the allegation is made.
- An allegation against the Heads/Principal, should be reported to the Chair of Governors, **Mr. Aatif Hassan**, without notifying the Heads/Principal, first.
- In the absence of Heads/Principal, an allegation against a member of staff must be reported to the Safeguarding Governor and in their absence the **Chair of Governor, Mr. Aatif Hassan.**
- In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head Teachers/Principal, or to the Safeguarding Governor, the Chair of Governor – Mr. Aatif Hassan should be contacted directly and without hesitation. He will then contact the LADO immediately for further advice. If Mr. Hassan is unavailable, then Suzie Longstaff, Managing Director can also be contacted.
- Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

Procedures & Informing the Local Authority Designated Officer (LADO)

- If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police **MUST** be made immediately.
- An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO of Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team for Eaton House Belgravia, who will advise on the next steps to be taken.
- Under no circumstances will Eaton House Schools conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken.

- Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.
- There are two aspects to consider when an allegation is made: -
- Look after the **welfare of the child** - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
- Investigate and support the person subject to the allegation - the case manager (usually the Heads/Principal, unless the Heads/Principal, is the subject of the allegation)

  should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- Eaton House Schools aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.
- The Heads/Principal will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation.
- The Heads/Principal will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.
- Any allegation against employed staff or volunteers, including those considered borderline, must be reported and discussed with the LADO without delay, and **within one working day**.
- An initial assessment of any allegation referred will be made by the LADO and the Heads/Principal. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the Eaton House Schools usual staff disciplinary or low-level concerns procedures.
- Where the initial discussion leads to no further action, the case manager and the LADO should:
- record the decision and justification for it; and
- agree on what information should be put in writing to the individual concerned and by whom.
- Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the Heads/Principal.
- If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.
- In the case of a referral and investigation, the Heads/Principal must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.
- Where there are no objections from the investigating agencies, the Heads/Principal will:
- inform the person making the allegation and explain the likely course of action
- ensure the parents of the pupil(s) who is the alleged victim have been informed about the allegation and the likely course of action
- inform the member of staff against whom the allegation is made and explain the likely course of action
- keep a written record of the above.
- The Heads/Principal, in consultation with the LADO, will make the decision whether or not to suspend the teacher / member of staff involved.
- If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. *The Education Act (2011)*

prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.

- The Heads/Principal, will take advice from the LADO, the Safeguarding Governor and other agencies to agree:
- Who needs to know and exactly what information can/cannot be shared
- How to manage speculation and gossip
- What, if any, information can be given to the wider community to reduce speculation
- If necessary, how to manage the press.
- The school has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.
- The following definitions will be used when determining the outcome of allegation investigations:
- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.
- Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.
- Both the DSL and Head will ensure that all staff should expect to support social workers and other agencies following any referral.

Allegations Relating to Supply Teachers/Employees of Third Party

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

In no circumstances will Eaton House Schools decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

The Eaton House Schools will discuss with the agency whether it is appropriate to suspend the supply teacher an investigation is carried out but this decision rests with the Heads/Principal, and the LADO.

Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

If the Eaton House Schools ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

Referrals will be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned.

This will also include anyone who would have been dismissed if they had not resigned first.

For teaching staff, the school also has a legal responsibility to report the matter to the to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in misconduct: the prohibition of teachers (October 2015).

The website landing page for reporting a teacher for misconduct can be found at: -
Report serious teacher misconduct - GOV.UK

Low-level Concerns

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A member of staff may have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted.

- Examples of such behaviour could include, but are not limited to:
    - being over friendly with children
    - having favourites
    - taking photographs of children on their mobile phone/other device
    - engaging with a child on a 1:1 basis in a secluded area or behind a closed door
    - using inappropriate sexualised, intimidating, or offensive language,

- Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols
- Any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.
- Staff must report any low-level concerns whatsoever to the Heads/Principal or Safeguarding Governor.
- The Heads/Principal will be the ultimate decision maker in respect of all low-level concerns. The Heads/Principal may wish to consult with the DSL and take a more collaborative decision-making approach if the need arises. (KCSIE 2026).
- Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- When a low-level concern has been raised by a third party, the Heads/Principal will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.
- The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.
- All low-level concerns will be recorded in writing. The record will include:
    - details of the concern.
    - the context in which it arose.
    - evidence collected by the Heads/Principal where the concern has been raised via a third party.
    - the decision categorising the type of behaviour.
    - action taken.
    - the rationale for decisions and action taken.
    - the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.
- The purpose of low-level reporting is to protect both pupils and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
- Low-level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
- A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the Eaton House

Schools Sharing of Concerns (Whistleblowing) Policy.

- If there is any doubt as to whether a low-level concern meets the harms threshold, then the Heads/Principal will consult with the LADO.

Non-recent / Historical allegations

Abuse can be reported no matter how long ago it happened.

Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police.

Non-recent / historical allegations made by a child, will be reported to the LADO in line with Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team, for Eaton House Belgravia**,** procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

Board of Governors and Proprietorial Oversight

Termly reports are sent to the Board of Governors where we discuss all safeguarding issues, and they will review the data breakdown logged on Eaton House Schools CPOMS system for each term.

In addition, the Heads/Principal speaks to the safeguarding governor about any concerns. Should the

school need to make a referral the governors will be immediately informed.

The SCR is checked by Heads and Principal as well as HR at Dukes House.

Use of School Premises by External Organisations

Our Board of Governors will ensure that when our schools hire or rent out our facilities to organisations or individuals (for example to community groups, sports associations, and/or service providers to run community or extra-curricular activities) that appropriate arrangements will be in place to keep children safe as per the DfE guidance [After-school clubs, community activities and tuition: safeguarding guidance for providers]

If these services or activities are under direct supervision or management of our staff, the Schools arrangements for child protection will apply.

Where services or activities are provided separately by another body our Board of Governors will seek assurance that the external organisation or person concerned has appropriate safeguarding and child protection policies and procedures in place. The external organisation will also agree to inspection of these arrangements and associated documentation when required.

This applies regardless of whether or not the children who attend any of these services or activities

are children on the Schools roll.

Our organisation may receive an allegation relating to an incident that happened when an individual or organisation was using our school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

As with any safeguarding allegation, our organisation will follow our safeguarding policies and procedures, including informing the LADO.

The Board of Governors will also ensure safeguarding requirements are included in any service level 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.

Keeping Children Safe outside of our Organisation

When services or activities are provided separately by another body, The governing body will seek assurances that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

Alternative Provision
Our organisation will seek written assurances from any alternative provider that the staff teaching or instructing our pupils have had appropriate safer recruitment checks completed on them as we would complete with our own staff.

This assurance does not remove our responsibility to undertake our own safeguarding due diligence and keep the placement under review even if has been approved by an external company, holds accreditation status or been approved by a local authority.

This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.
We will request a letter of assurance from any alternative provider that all safeguarding checks have been completed to the right standard including appropriate level of DBS certificate, barring information (if appropriate) and two satisfactory references obtained to evidence that they are deemed suitable and safe to work with children and young persons.

Our organisation will seek clarification that those same persons have self-declared that they know of no reason why they would not be deemed to work with children and young people and that they are also medically (physically and mentally fit) to work.

Records of any alternative providers will include all the address of the subcontracted provision and

satellite sites.

Any placements will be reviewed at least half-termly and any safeguarding concerns will trigger an immediate review and where necessary termination. In all cases where there is doubt about the risk of welfare or safety to any young person, we will immediately remove them from the setting

The governing body 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 our premises; and that failure to comply with this would lead to termination of the agreement.

The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that our organisations should expect these providers to have in place is as below:

https://www.gov.uk/government/publications/alternative-provision

Adults who supervise children on work experience

Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings' (Feb 2022) Our organisation will ensure that the placement provider has policies and procedures in place to protect children from harm.

Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement.

The School will consider the specific circumstances of the work experience. Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary.

These considerations would include whether the person providing the teaching / training / instruction / supervision to the child on work experience will be:

- unsupervised themselves, and
- providing the teaching/training/instruction frequently (more than three days in
- a 30-day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children.

If so, the School will ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.
Whilst it is acknowledged that Eaton House School is not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience, it will still make enquiries with that work placement provider to seek assurances on what checks are completed on their staff.

If the activity undertaken by the child on work experience takes place in a 'specified place, such as in a nursery, school or sixth form college environment, and gives the opportunity for unsupervised contact with children / young people, this may itself be considered to be regulated activity relating to children.
In these cases, and where the child doing the work experience is 16 years of age or over, the work

experience provider e.g. nursery, school or sixth form college should consider whether a DBS enhanced check should be requested for the child in question. DBS checks cannot be requested for children under the age of 16.

Will ensure that all health and safety considerations have been taken into account including appropriate risk assessments in place to reduce the risk of harm to our pupils with the activities they intend to carry out as well as appropriate training, instruction and supervision.

Advice on work experience can be found on the Health and Safety Executive website:
Young people at work: Work experience - HSE

Other Documents Informing the Policy

1. Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings'

https://saferrecruitmentconsortium.org/

2. NSPCC guidance 'Online safety and school'

https://www.gov.uk/government/publications/teaching-online-safety-in-schools

3. Mental health and behaviour in schools: departmental advice

https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges

4. *When to call the police*, non-statutory guidance from the National Police Chiefs' Council

https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20police%20guidance%20for%20schools%20and%20colleges.pdf

5. DfE advice 'Information Sharing to safeguard children and young people: Advice for practitioners providing safeguarding services

https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf

7. DfE Searching Screening and Confiscation Advice for schools

https://www.gov.uk/government/publications/searching-screening-and-confiscation

8. UKCIS Education Group: Sharing nudes and semi-nudes: advice for education settings working with children and young people

https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

9. Designated teacher for looked after children

https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children

10. Counselling in schools: *a blueprint for the future*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf

11. UK Council for Internet Safety (UKCIS) guidance: *Education for a connected World*

https://www.gov.uk/government/publications/education-for-a-connected-world

12. The UKCIS ***external visitors' guidance*** will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings

13. National Crime Agency's CEOP education programme: Thinkuknow

https://www.ceopeducation.co.uk/

14. Public Health England: ***Every Mind Matters***

https://www.gov.uk/government/news/public-health-england-launches-new-every-mind-matters-campaign

15. Harmful online challenges and online hoaxes - this includes advice on preparing

for any online challenges and hoaxes, sharing information with parents and carers

and where to get help and support.

https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes

16. London Grid for Learning – undressed guidance,

Undressed (lgfl.net)

17. Force Marriage Unit resources

https://www.gov.uk/guidance/forced-marriage

18. Forced Marriage – The Right to Choose

https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

19. County Lines – disruption toolkit

https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit

20. Operation Encompass

The helpline is available 8AM to 1PM, Monday to Friday on **0204 513 9990** (charged at local rate).

Home : Operation Encompass

Appendix 1: Categories of abuse and specific Safeguarding issues

Definitions of Abuse

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Some staff may feel that the content of this appendix does not apply to them due to the age -range and nature of activity described.

However, all staff must be prepared to act on disclosures from any child or parent / carer which may be occurring or witnessed outside of their organisation.

Adults or young people from within or outside of their organisation may also commit inappropriate acts which are or can cause risk of harm to young people. Therefore, information in this section is deemed relevant to be read and understood by all.

It is therefore essential that all staff are familiar with the rest of the information contained in this policy and assume it would never occur in their establishment and if any doubt refer anything reported to the DSL in the first instance.

KCSIE 2026 provides an updated definition of abuse as:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Safeguarding is also defined as protecting children from maltreatment inside or outside of the home including online.

Harm can include ill treatment that is not physical as well as the impact of children witnessing ill treatment of others, particularly when children see, hear or experience domestic abuse and its effects.

This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

KCSIE 2026 also states the following:

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

The DSL will ensure that all staff are aware of the signs of abuse. The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked.

The designated safeguarding lead (and deputies) will 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

Any concerns, whether they are listed below or not, should be brought to the attention of the DSL immediately. The following signs are not conclusive evidence but may be a warning, particularly if a pupil exhibits several signs or a pattern emerges. It is important to remember that there may also be explanations, other than abuse, for a pupil showing such signs.

Categories of Abuse

The main categories of abuse outlined in KCSIE, are

- Physical abuse
- Emotional abuse (including domestic abuse)
- Sexual abuse
- Neglect

Risk factors

In an abusive relationship the child may

- appear frightened or wary of the parent/s or other adult
- act in a way that is inappropriate to her/his age and development, although full account needs to be taken of different patterns of development and different ethnic groups.
- The parent or carer may
    - persistently avoid child health promotion services and treatment of the child's episodic illnesses
    - have unrealistic expectations of the child
    - frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
    - be absent or misusing substances
    - persistently refuse to allow access on home visits
    - be involved in domestic violence.

Staff should be alert to changes in a pupil's behaviour if there is a new carer (e.g., nanny or au pair) in the pupil's home.

Recognising signs of physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

The following are often regarded as indicators of concern:

- an explanation which is inconsistent with an injury
- several different explanations provided for an injury
- unexplained delay in seeking treatment
- the parents/carers are uninterested or undisturbed by an accident or injury
- parents are absent without good reason when their child is presented for treatment
- repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- family use of different doctors and A&E departments
- reluctance to give information or mention previous injuries
- two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- repeated or multiple bruising on the Head or on parts of the body unlikely to be injured accidentally
- variation in colour, possibly indicating injuries caused at different times
- the outline of an object used, e.g., marks from a belt or a hairbrush, or of a handprint
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- bruising around the face
- grasp marks on small children
- bruising on the arms, buttocks and thighs may be an indicator of sexual abuse
- bite marks
- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks)
- scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath
- medical attention is sought after a period of delay when a fracture has caused symptoms such as swelling, pain or loss of movement.

Recognising signs of emotional abuse

Another form of abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child that he or she is worthless or unloved, inadequate, persistent critism, belittling and name-calling or valued only insofar as meeting the needs of another person. It may include not giving the child opportunities to express his or her views, deliberately silencing the child or 'making fun' of what he or she says or how the child communicates. It may feature age or developmentally inappropriate expectations being imposed on the children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, including domestic violence.

It may involve serious bullying (including cyberbullying), causing the child frequently to feel frightened or in danger, or the exploitation or corruption of the child. Some level of emotional

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

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse may also indicate the presence of other forms of abuse.

The following may be indicators of emotional abuse:

- developmental delay
- abnormal attachment between a child and parent/carer, e.g.,
- excessive anxiety on the part of either
- indiscriminate attachment or failure to attach
- aggressive behaviour towards others
- scape-goateed within the family
- frozen watchfulness, particularly in pre-school children
- low self-esteem and lack of confidence
- withdrawn or seen as a "loner" – difficulty relating to others
- reverting to younger behaviour
- depression, withdrawal
- fear of academic failure or 'getting things wrong'.

For further information on bullying, including cyber bullying, please see Eaton House Schools Anti- bullying Policy.

Recognising signs of sexual abuse

Sexual abuse (KCSIE 2026) involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

It refers also to specific sexual offences under the Sexual Offences Act 2003, activities that involve physical contact, including assault by penetration with or without an object (to vagina, anus or mouth without consent such as rape) or non-penetrative acts such as masturbation, kissing, rubbing and touching the outside of clothing

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are

- inappropriate sexualised conduct
- sexually explicit behaviour, play or conversation, inappropriate to
- the pupil's age
- continual and inappropriate or excessive masturbation
- self-harm (including eating disorders), self-mutilation and suicide attempts
- involvement in prostitution or indiscriminate choice of sexual partners
- an anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties).
- Some physical indicators associated with this form of abuse are:
- pain or itching of genital area
- blood on underclothes
- pregnancy in a younger girl where the identity of the father is not disclosed
- physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Staff should also be aware of the possibility of sexual exploitation.

Harmful sexual behaviour (HSB)

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

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

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

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

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

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

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

Signs of neglect

Neglect may be defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to;

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.
- be responsive to a child's basic emotional needs.

The following may be indicative of neglect of a child:

- the child is dirty, smelly, poorly clothed or appears underfed
- the child has lingering illnesses which are not attended to
- there is a marked deterioration in schoolwork
- the child exhibits significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or a 'don't care' attitude
- overly compliant behaviour
- a child who is reluctant to go home or is kept away from school for no apparent reason
- 'tummy pains' with no medical reason
- running away from home, suicide attempts
- extreme anger, sadness or depression
- child left with adults who are intoxicated or violent
- child left alone for excessive periods
- child thrives away from home environment.

Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of

paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents.

Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing.

This can lead to increased risks with children who may spend long periods online or at an older age have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

Extensive guidance on a wide variety of specific issues can be found in **Annex B of KCSIE** and in other guidance listed at the end of this policy.

- Child abduction and community safety incidents
- Children missing from education – also see Attendance Policy
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE)domestic abuse
- Fabricated or induced illness
- Homelessness
- So-called 'honour based' abuse, female genital mutilation (FGM) and forced marriage
- Mental health
- **Child-on-child** abuse including: Nudes/semi-nudes, youth produced sexual imagery partially or wholly generated through artificial intelligence (AI) sometimes known as "deep fakes" or "deep nudes"
    - Child to parent or carer giver abuse; recognising that abuse can occur to other family members or carers in a household.
    - Sexual violence and sexual harassment
    - Up-skirting
    - Online behaviour and cybercrime
- Private fostering
- Preventing radicalisation (including Channel)

Guidance and practical support on specific safeguarding issues or concerns will be sought where necessary by the DSL.

The DSL will ensure that staff are aware of specific issues including, but not limited to: **child-on-child**

abuse; sexual violence and sexual harassment; harassment of any kind, serious violence including use of weapons, misogyny, online abuse, including imagery; domestic abuse; child to parent or care giver abuse, parents affected by drug or alcohol abuse; child sexual exploitation, female genital mutilation; fabricated or induced illness; children missing education; preventing radicalisation; mental health

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child.

Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

There are two age-appropriate guides to support children 5–11-year-olds and 12–17-year-olds available on the gov.uk website.

5–11-year-olds: https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds

12–17-year-olds: https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds

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

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

Children who are absent from education

At Eaton House Schools we adhere to statutory guidance of 'Working Together to Improve School Attendance' . All staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, or for prolonged periods, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

Our organisation's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support which our organisation draws upon, includes:

Working together to improve school attendance

https://assets.publishing.service.gov.uk/media/66bf300da44f1c4c23e5bd1b/Working_together_to_improve_school_attendance_-_August_2024.pdf

Early years foundation stage statutory framework (July 2026)

https://assets.publishing.service.gov.uk/media/687105a381dd8f70f5de3ea9/EYFS_framework_for_group_and_school_based_providers_.pdf

Children missing education - DfE statutory guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Child missing from home or care - DfE statutory guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care___3_.pdf

Children and adults missing strategy - Home Office strategy

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/117793/missing-persons-strategy.pdf

Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14- to 16-year-olds in Further Education and Sixth Form Colleges.

https://www.gov.uk/government/publications/full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges/full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges-2023-to-2024-academic-year

We adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are absent from education:

- All pupils are recorded on the Schools admission register and their attendance is recorded in the daily attendance register.
- Staff must be aware that repeated absence may be an indicator of can be a potential indicator of abuse or neglect and repeated absence must be brought to the attention of the DSL.
- All unexplained absences will be followed up in accordance with the Attendance and Truancy Policy for each of the schools.
- The local authority is informed of any child whose name is added to or deleted from the admission register at a non-standard transition point, in accordance with Working together to improve school attendance.
- If a pupil leaves the schools, whether there are any concerns about that child or not, the schools will seek to obtain, for inclusion in the return the name of the future school, the expected date of the child's first day there, and, if applicable, the family's new home address and the date on which the family will be moving to it.
- The schools will also follow up directly by phone call or email with any future school to

establish that the leaver has indeed turned up on day one at their intended destination

- If there are concerns about a pupil and a parent refuse to supply the information this may also result in a report to Children's Services.
- The school will inform the local authority of any pupil who fails to attend school regularly or who has been absent without the Schools permission for a continuous **period of ten days or more.**
- However, our organisation will endeavour to deal with any unexplained or unusual patterns of attendance or absence well before this statutory requirement and on most occasions before a **continuous period of 5 days.**
- If a pupil who has current involvement with Children's Services is absent from the school the normal procedure of a first day call to the home will be followed.
- The pupil's social worker must be informed of all absences promptly, and immediately, if no response is received or if no adequate or credible reason is given for the absence.
- When a pupil moves to another school, the DSL must inform the receiving school without delay that child protection records. Within 5 days the original records must be passed on either by hand or sent by Royal Mail Special Delivery Guaranteed or Royal Mail Signed For post and a receipt obtained at the post office at which the letter with the records is handed in. Duplicate records must be retained. Duplicate records should be kept securely until the pupil reaches the age of 25 years.
- The school holds contact details for both parents (unless a parent is deceased, or a parent has no contact with the child) and two emergency contact numbers.

Please also see the Attendance Policy.

Children with family members in prison

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

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Victims can be exploited even when the sexual activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Child Sexual Exploitation can be committed or facilitated by an organised network or gang, and victims may identify as part of this group. This may constitute modern slavery.

Child Sexual Exploitation can be committed by an individual or an organised network and most sexual abuse is committed by individuals known to the victim.

The schools are aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse.

Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

Inappropriate relationships:

Usually involves just one abuser who has inappropriate power –physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend:

Abuser grooms the victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

Organised exploitation and trafficking:

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

Further advice and guidance on child sexual abuse can be found at:
Resources for education settings | CSA Centre

Child Criminal Exploitation (CCE) including gangs and County Lines

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Staff will be aware that exploitation may be committed or facilitated by organised networks or gangs, that children may identify as belonging to those groups, and that exploitation may also constitute modern slavery.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Children may be forced or manipulated into transporting drugs or money, working in cannabis factories, shoplifting, pickpocketing, committing vehicle crime or threatening or committing serious violence.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile telephone lines or another form of “deal line”. This activity may

take place locally or across the UK. Children and vulnerable adults may be exploited to move, store or sell drugs and money.

Gangs may establish a base within the home of a vulnerable person through force or coercion. This is commonly referred to as “cuckooing”. Children may also be recruited and exploited online through social media and other digital platforms.

Children may become trapped through threats of violence, intimidation, manufactured drug debts or threats against their families. They may be coerced into carrying weapons or may begin carrying a weapon because they believe it will protect them from harm.

A child cannot consent to being exploited, abused or trafficked. Criminal exploitation may have occurred even where the activity appears voluntary or the child identifies as belonging to the group involved. Children who are criminally exploited must be recognised and treated as victims, including where they have committed offences as a result of coercion.

CCE may involve trafficking and constitute modern slavery. Where a potential victim is identified, the Academy will follow its child protection procedures and consider a referral through the National Referral Mechanism, alongside any referral to children’s social care or the police.

Staff will remain alert to indicators of CCE and county lines and must report any concerns immediately to the DSL.

Staff will ensure that any exploited children should be treated as victims and recognise that these children may be criminalised for actions undertaken under coercion.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- going missing for periods of time or regularly coming home late,
- regularly missing school or education or not taking part in education,
- appearing with unexplained gifts or new possessions,
- associating with other young people involved in exploitation,
- associating with or identifying as belonging to gangs or groups / networks intent on carrying out criminal activities.
- having older boyfriends or girlfriends,
- suffering from sexually transmitted infections,
- mood swings or changes in emotional wellbeing,
- drug and alcohol misuse,
- displaying inappropriate sexualised behaviour.

Domestic abuse

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

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

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

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

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

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

Extra-familial Harms

All our staff, but especially the designated safeguarding lead (and deputies) will 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (*teenage relationship abuse including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation***), criminal exploitation,

serious youth violence, county lines, and radicalisation. (KCSIE 2026)

Multi-agency practice principles for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice can be found at:

https://tce.researchinpractice.org.uk/

https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners

Operation Encompass

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

Operation Encompass **does not replace statutory safeguarding procedures**. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse.

The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate)

Eaton House School is part of Operation Encompass, information sharing scheme. Operation Encompass supports children who experience domestic abuse.

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

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

The School's DSL/DDSL have completed the National Online Operation Encompass Key Adult training.

We ensure our parents are fully aware that we are an Operation Encompass setting including when a new child joins the School.

The Safeguarding Governor reports on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

So called 'honour based' abuse (HBA)

HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour.

Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code this includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

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

There is a statutory duty on teachers to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the Schools local safeguarding procedures.

Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK. A pupil may have difficulty walking, sitting or standing and may even look uncomfortable. A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating. There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHCE
- visiting female elder from the country of origin

- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Mandatory Reporting of FGM

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure.

Under no circumstances should school staff physically examine pupils.

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialing 101.

The report should be made immediately.

The duty to report should not be transferred to the DSL, however the DSL **must be informed**. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including by dialing 999 if appropriate.

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into It. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. Staff will receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

The Forced Marriage Unit (FMU) has created: multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage -

GOV.UK (Welcome to GOV.UK (www.gov.uk))

School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk

In addition, **since February 2023** it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Mental health

Schools and colleges have an important role to play in supporting the mental health and wellbeing of pupils including promoting wellbeing; early identification; targeted support; and liaison and referral with local partners.

Mental health problems can also, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Mental health problems may themselves develop into safeguarding concerns, this could include self-harm, suicidal ideation or risk of suicide.

Early intervention to identify issues and provide effective support is crucial. The Schools role in supporting and promoting mental health and wellbeing can be summarised as:

- Prevention: the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively, this includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- Identification: recognising emerging issues as early and accurately as possible
- Early support: helping pupils to access early support and intervention
- Access to specialist support: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the schools suspect that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs.
2. a plan to set out how the pupil will be supported.
3. action to provide that support.
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils.

These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school• traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries.
- other traumatic incidents such as a natural disasters or terrorist attacks - Where children - experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.
- Mental health professionals have classified these as:
- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and antisocial behaviour
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive

developmental disorders

- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including self harm, eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder suicide, ideation and suicide risk.

Only appropriately trained professionals can make a diagnosis of a mental health problem.

School and college staff, however, still have an important role to play. Specifically, they can support the fulfilment of 4 key roles:

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

If staff have any concerns about the mental health of a child, they should report this to the DSL immediately following the procedures outlined in this policy.

More information can be found in the DfE 'Mental Health and Behaviour in Schools guidance.

Children who are lesbian, gay, bisexual, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, in line with 'Keeping Children Safe in Education', we recognise that these children and in some cases children who are perceived by other children to be lesbian, gay or bisexual can be just as vulnerable as children who are.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns whenever needed.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and staff will be made aware of the range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse from the statutory guidance available.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

Our staff will work with families of those young persons who may be questioning their own gender and encourage them to seek clinic help and advice from a clinical professional with relevant

experience.

Our staff, when supporting a gender questioning child, will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Children who are questioning their gender

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

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

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

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

Child-on-Child Abuse (formerly known as Peer-on-peer abuse)

Children are also vulnerable to abuse by their peers. The school has a zero-tolerance approach to such abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Staff will always challenge such behaviours. Any child can be vulnerable to **child-on-child** abuse and staff should be alert to signs of such abuse amongst all children. However, individual, andsituational factors can increase a child's vulnerability to abuse by their peers. For example; children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable as may pupils with SEND or certain medical conditions. Children who are LGBT can also be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

All children involved whether victim or perpetrator will be treated as "at risk" and supported. The school recognises the gendered nature of **child-on-child** abuse and that it is more likely that girls will be victims and that boys will be perpetrators, but all **child-on-child** abuse is unacceptable and will be taken seriously.

Staff are made aware that **child-on-child** abuse may happen inside or outside school or online and

that that even if there are no reports in the school it does not mean **child-on-child** abuse is not happening, it may be the case that it is just not being reported. A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the reporting procedures outlined above.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse which can include 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)
- Sexual violence and sexual harassment (see below and Part five of KCSIE)
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- 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
- Up-skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission
- Initiation/hazing type violence and rituals.

Where a child or young person may be asked to perform an act or series of inappropriate acts to gain membership to a group or partake in the wearing of a plastic bag over their head to allegedly heighten sexual experience before they pass out.

Through safeguarding training and anti-bullying training, staff will be made aware of Schools Pupil Behaviour, Discipline and Exclusions Policy, Anti-bullying Policy and safeguarding procedures as appropriate.

- It may be appropriate to regard a young person's behaviour as abusive if:
- There is a large difference in power (for example age, size, ability, development) between the young people concerned.
- The perpetrator has repeatedly tried to harm one or more other children.
- There are concerns about the intention of the alleged perpetrator.
- There is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm

Responding and Reporting Child-on-Child Abuse (non -sexual in nature)

The DSL will not undertake any enquiry or investigation where a case is referred to Children's Services or the police.

The initial assessment of any allegation will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved, whether the allegation is demonstrably false or whether there has been inappropriate behaviour that can be dealt with through the Schools usual disciplinary procedures.

The DSL will lead enquiries at the Schools level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the pupil making the allegation and explain the likely course of

action. If Children's Services or the police have been informed the schools will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will ensure the parents of the pupil who is the alleged perpetrator are informed about the allegation and the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The necessary support and any required sanctions following **child-on-child** abuse will be determined on a case-by-case basis.

The Heads/Principal will make the decision whether or not to suspend or exclude the pupil(s) involved.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The schools will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Appropriate support from within our own pastoral team, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

If pupils are found to have made malicious allegations, appropriate sanctions will be applied, which could include temporary or permanent exclusion.

Strategies to reduce the risk of child-on-child abuse

Preventative strategies for child-on-child abuse are regularly considered. Eaton House School has an ethos where pupils feel safe to share information about anything that is upsetting them and any derogatory language or behaviour is always by staff. Child-on-child abuse can be preventable and timely, evidence-based support may prevent children progressing to abuse or violence in the first place.

There is a strong and positive PHSE and RSE curriculum and pastoral care system, which gives pupils an open forum to talk things through and explore disputes or difficulties.

Topics will include but not limited to:

(i) sexism,

(ii) homophobia,

(iii) sexual violence and harassment.

(iv) racism,

(v) misogyny and misandry,

(vi) derogatory behaviour,

(vii) physical violence and conflict

(viii) deepfakes

(ix) misogynistic online influencers.

The IT curriculum also teaches pupils about acceptable online behaviour.

The School Council provides a 'pupil voice' and encourages pupils to develop the rules and boundaries of acceptable behaviour.

Prejudiced Behaviour

Pupils may also display hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

Children who are lesbian, gay, bi, or trans (LGBT) or gender questioning

The Government has added guidance on gender questioning into Keeping Children Safe in Education 2026, (KCSIE 26).

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children.

In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns whenever needed.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and staff will be made aware of the range of support available to help schools counter homophobic, biphobia and transphobic bullying and abuse from the statutory guidance available. (KCSIE 2026)

Gender Questioning

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

Our staff will work with families of those young persons who may be questioning their own gender and encourage them to seek clinic help and advice from a clinical professional with relevant experience.

Staff will be made aware not to initiate any action in this area but will be provided support and advice about responding to circumstances where a child or their parent has raised a request relating to social transition

Our staff will remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. We will aim to adopt policies that maintain flexibility and avoid rigid rules based on gender stereotypes to ensure an equal opportunity for all.

Children living in stealth

Our staff will be particularly conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, school or college friends/staff may be unaware of their biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state. Staff will involve the designated safeguarding lead in these cases.

Support for children who wish to detransition

There may be circumstances where a child wants to fully or partially reverse a request that has previously been agreed. The Cass Review highlighted the importance of maintaining flexibility and keeping options open for children who have socially transitioned and recommended that support should be provided to children who wish to de-transition.

Our staff will work closely with parents or carers and relevant experts to ensure that children in this position are supported.

Our staff, when supporting a gender questioning child, will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

All children involved whether victim or perpetrator will be treated as "at risk" and supported.

Child-on-child Abuse – harmful sexual behaviour (HSB) sexual violence and sexual harassment

Harmful sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. It can occur online or face-to-face (both physically and verbally) and is never acceptable.

The child's age, developmental stage, understanding, vulnerability, any difference in age or power and the context of the behaviour will be considered.

Staff are aware of our organisation's policy that there is a zero-tolerance approach to sexual harassment, sexual violence that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys".

Failure to do so can lead to a culture of unacceptable behaviour, misogyny, misandry, an unsafe environment and in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it,

Our staff will remain alert to recognise, acknowledge and understand the scale of HSB, sexual harassment and sexual violence and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

HSB, Sexual violence and sexual harassment can occur between children or groups of children of any age and sex (primary through to 6th form) , and within intimate personal relationships between peers this can also include misogyny and misandry.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

However, it should be made clear to any alleged victim that their information stated may have to be passed onto relevant people to help support them with their disclosure.

Staff should follow the processes outlined in this policy when dealing with any report of any harmful sexual behaviours including those that have happened outside the school and/or online.

A child displaying harmful sexual behaviour (HSB) may also be an indication that they are a victim of abuse themselves or experienced trauma or exploitation.

Safeguarding procedures will therefore consider the needs and welfare of both the child who has experienced harm and the child displaying the behaviour and provide appropriate support.

Staff who are concerned about a pupil's sexual behaviour, including behaviour occurring online, are required to speak to the DSL without delay or a DDSL in their absence.

Any reports of harmful sexual behaviour, sexual harassment and sexual violence will require the immediate consideration of the victim, alleged perpetrator, other directly involved children and the wider school population.

Part Five of KCSIE 2026 provides detailed guidance on harmful sexual behaviour, sexual harassment and sexual violence.

Staff have been trained to be aware of and respond to ALL reports and concerns relating to Child-On-Child Abuse including HSB, sexual violence and / or sexual harassment both online and offline, including those which might be happening outside the school / college. Our DSL will take charge of procedures following a report on sexual violence / sexual harassment. (KCSIE 2026)

Thresholds of Sexual behaviour by children

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental,

inappropriate, or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Additional guidance can be found on the NSPCC website at:

Responding to children who display sexualised behaviour

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following **'traffic light' approach:**

Green behaviours reflect safe and healthy sexual development. They are:

- Displayed between children or young people of similar age or developmental ability
- Reflective of natural curiosity, experimentation, consensual activities, and positive choices

Amber behaviours have the potential to be outside safe and healthy development. They may be:

- Unusual for that particular child or young person
- Of potential concern due to age or developmental differences
- Of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

Red behaviours are outside safe and healthy behaviour. They may be:

- Excessive, secretive, compulsive, coercive, degrading or threatening
- ii. Involving significant age, developmental or power differences
- iii. Of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for referral to Children's Services.

Misogyny and Misandry

Misogyny can be defined as:

The hatred, prejudice or devaluation of women and girls which creates risk of harm, normalises abuse or impairs a child's welfare and safety.

Misandry can be defined as:

The hatred of, prejudice against, or deep-seated bias directed towards males. It involves the systematic or interpersonal attitudes that stereotype boys or men as inherently harmful, abusive or deficient in caregiving capacity which can impact equitable risk assessment, emotional support and behavioural

management.

This bias can include general assumptions about male aggression or predation or dismissing the vulnerability, emotional trauma or emotional distress experienced by boys under the assumption that they are naturally resilient or less deserving of empathy. (www.pathwaygroup.co.uk)

Sexual Assault and Consent

Staff will be trained to recognise the possibility that a younger child could also harm an older child.

Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. A single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

Consent: is about having the freedom and capacity to choose.

Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs.

Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:

- a child under the age of 13 can never consent to any sexual activity,
- the age of consent is 16, and
- sexual intercourse without consent is rape.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

Responding and Reporting of Harmful Sexual Behaviours

Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between peers.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

However, it should be made clear to any alleged victim that their information stated may have to be passed onto relevant people to help support them with their disclosure.

Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.

When responding to a report of HSB, Sexual Harassment or Sexual Violence the DSL will decide on the response following the advice in Section 5 of KCSIE.

This will include

• Initial response - considering the needs of both victim(s) and alleged perpetrator(s).

The victim will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support they will be offered.

This however will be balanced against the Schools duty and responsibilities to protect other children and the following factors below:

- The nature of the alleged incident (s), including whether a crime may have been committed and /or whether Harmful Sexual Behaviour (HSB) has been displayed.
- The ages of children involved.
- The developmental stages/puberty of the children involved.
- Any power imbalance between the children – are alleged perpetrators significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- Is the incident a one-off or sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- Has the sexual violence / harassment taken place within an intimate personal relationship?
- Importance of understanding intra familial harms and any necessary support for siblings following incidents.
- Any on-going risks to victim, other children, adult students or school or college staff?
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation?

The DSL will also review the following when responding to a report of sexual violence in order to make sure the right procedures are carried out

- Record Keeping
- Risk Assessment of the disclosure / event.
- Consideration of most appropriate response: internal management, early help, referral to Children's Social Care and/or referral to the Police.
- Ongoing response – safeguarding and support for all parties

The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police.

The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved. The DSL will lead enquiries at the Schools level if agreed with the relevant investigating agencies.

Support will depend on the circumstances of each case and the needs of the child, it may include completion of risk assessments to support children to remain in school whilst safeguarding other children and the victim, delivery of early intervention in respect of HSB and/or referral to The Harbour Centre Sexual Assault Referral Centre (SARC) where a pupil discloses a rape, an attempted rape or a serious sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence) whether this has happened recently or in the past. The SARC also has a 24/7 helpline 01603 276381 if pupils or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on The Harbour Centre website. The DSL will always contact the police in cases of rape and serious sexual assault as per the guidance When to call the Police: a guide for schools and colleges, National Police Chiefs Council.

The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action, unless this is considered to place either of them at further harm.

If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

Reporting

Considering confidentiality and anonymity

Confidentiality

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others to provide support and engage appropriate agencies.

The schools will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the schools not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.

For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.

Staff MUST seek advice from the designated safeguarding lead (or deputy), who will consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater

risk)

- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and the police.

Rape, assault by penetration and sexual assaults are crimes.

Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, and the reasons will be explained to the victim and appropriate specialist support will be offered to the child**.**

Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, appropriate staff will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

We will do all we can as an organisation to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The schools will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Any sanctions required following a report of **child-on-child** abuse will be determined on a case-by-case basis.

Risk assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support

- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the schools, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.
- Risk assessments should be recorded (paper or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all our children and young people and put adequate measures in place to protect and keep the child safe.

Appropriate Support for Victim and Perpetrator

Appropriate support in schools, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

This will include pastoral support for both perpetrator and / or victim, through in-house counselling, reflection or behaviour modification support which may also be sought from external specialist agencies.

In all cases the schools will monitor the progress of both perpetrator and victim to ensure that this type of behaviour does not occur again.

E-safety and online behaviour

The school adopts a whole school approach to online safety which seeks to reduce risk as far as possible without depriving pupils of the significant benefits provided by technology and the internet. Computing and PSHCE lessons are used to help pupils to understand and avoid the risks associated with 'online activity'.

The breadth of issues classified within online safety is considerable, but can be categorised into four main areas of risk:

- content: being exposed to illegal, inappropriate, or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams

Eaton House Schools Online Safety Policy explain the responsibilities of staff in relation to keeping pupils safe online.

Eaton House Schools does all it reasonably can to limit the pupil's exposure to the above risks in school. It has sophisticated filters and monitoring systems in place, which are designed to protect them from online abuse without imposing unreasonable restrictions and preventing pupils benefitting from the wealth of resources available online.

Pupils also receive guidance on the safe use of the internet and are educated about the risk of online harm (including anti-bullying) primarily through their Computing and PSHCE lessons.

Cyber-bullying by pupils, via texts, direct messages, social media or email, will be treated as seriously

as any other type of bullying and will be managed through the Schools anti-bullying policy and procedures.

Social networking sites and other apps can be sources of risk of inappropriate and harmful behaviour. If staff suspect that a pupil may be at risk of or suffering from online harm, they should follow the reporting procedures set out in this policy.

We will work closely with parents and carers and provide up to date information regarding the safe use of the internet for their child including signposting to guidance on the impact of screentime on their child's welfare and academic performance in lessons.

Help for early years providers : Screen use

New guidance on screen use for children aged 5–16 - GOV.UK

Remote Education

Remote education can be defined as when the Eaton House Schools are in regular contact with pupils who have logged onto the system for receiving the delivery of educational lessons over the internet. This method of delivery is classed by our organisation as ***lone working*** if only one tutor is working with one pupil over the internet e.g. holding a tutorial or an online peripatetic lesson.

Therefore, specific arrangements must be in place to safeguard both parties involved in the session. All our staff who deliver online learning will be appropriately trained to do so.

Eaton House Schools will ensure that those communications will be used to reinforce the importance of children being safe online and enable parents and carers to understand what systems Eaton House Schools uses to filter and monitor online use.

Parents and/or carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from Eaton House Schools and if their child is going to be interacting with online.

Filters and monitoring

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our Board of Governors will do all they can to limit our children's exposure to the above risks from the Eaton House Schools IT system.

Sharing of nude or semi-nude images and/or videos including those generated using AI:

For the purposes of this guidance, the term 'making or sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. (previously known as "sexting" or "youth produced sexual imagery")

The term 'images' includes all visual content, such as photographs, videos and livestreams.

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute inappropriate imagery (nudes, semi-nudes, sexting) in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

KCSIE 2026 provides further clarity in this area:

All incidents involving the making or sharing of nudes and semi-nudes require a safeguarding response, whether apparently consensual or non-consensual. This includes photographs, videos, livestreams, digitally altered images and wholly content generated using artificial intelligence sometimes described as deepfakes or "deep nudes".

Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person.

Up-skirting is also a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Anyone of any gender can be a victim.

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view images, delete images or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

Parents / carers will be informed at an early stage of inappropriate online behaviour, unless there is reason to believe that involving parents would put the pupil at risk of harm.

If there is concern a young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

Anyone of any gender can be a victim.

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view images, delete images or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

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If there is concern a young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

<u>Preventing Radicalisation</u>

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being

drawn into terrorism'. This is known as the **'Prevent Duty'**. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of Eaton House Schools safeguarding approach.

Radicalisation refers to the process of legitimising support, or use of terrorist violence.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

It can also call for the death of members of the armed forces, whether in this country or overseas.

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

Serious violence can be defined as specific offences of severe physical harm or weaponed enabled crimes involving children and teenagers (1-19 years), commonly encompassing homicide, grievous bodily harm (GBB), knife or weapon attacks.
Weapon enabled crime is defined as any threatening behaviour, possession, or actual use of knives, wounding, firearms, or offensive weapons regardless of initial intent.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Sudden unexplained absences, possession of unexplained cash or multiple phones, physical injuries or carrying weapons "for protection".
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, artwork or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

Visiting speakers are always vetted and staff must obtain permission from the Head / Principal for any speakers to visit Eaton House Schools. Information on any online research undertaken, references received (written or verbal on their suitability) etc must be collated in the schools visitor log which must be a separate document from the signing in book / tablet at reception.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability. At Eaton House Schools, we will ensure that:

- Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- The DSLs has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils.
- The DSL will make referrals in accordance with Wandsworth Channel Procedures

https://www.wandsworth.gov.uk/community-safety/counter-terrorism-and-counter-extremism/prevent-counter-terrorism/#:~:text=However%2C%20anyone%20in%20Wandsworth%20can,best%20way%20to%20provide%20support.

https://www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/radicalisation-and-extremism

Martyn's Law (Terrorism Protection of Premises Act 2025 - Unwanted Visitors / Lockdown procedures)

Martyn's Law – The Terrorism (Protection of Premises) act 2025 became law on 3rd April 2025. Named after Martyn Hett who was sadly killed in the Manchester Arena bombing on 22nd May 2017.

Whilst this policy has been written taking into account child protection guidance provided from the Prevent Duty, our organisation will be working towards achieving the STANDARD TIER recommendations for venues who can hold between (100 to 799 persons) as laid out in Martyn's Law.

Eaton House Schools will ensure steps have been taken to prepare for any potential terrorist attack and be ready to help keep our young people, staff and anyone else on the premises in the event of any attack or unwanted intruder on the premises.

Eaton House Schools has a member of the senior leadership who has been appointed to oversee the roll out of security procedures to meet our duty under the new Act is:

Liam Corbett, Bursar.

Private Fostering

A private fostering arrangement occurs when someone other than a parent or close relative cares for

a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

Fabricated Illness

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid.
- Induction of illness by a variety of means

Further information may be found at :- https://www.londoncp.co.uk/fab_ind_ill.htm

Appendix 2: Human Rights and Equality Act

Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention.

The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and Protocol 1,
- Article 2: protects the right to education. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality

Act 2010).

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with a particular protected characteristic to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties

under the act can be found at Equality Act 2010: advice for schools -GOV.UK (www.gov.uk), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).

Record-keeping

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period of time.

All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The Information Commissioner has published guidance on employment records in its, The Information Commissioner Employment Practices Code which provides some practical advice on record retention

Management of Safeguarding - Sport

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

Management of Safeguarding – Toilets

The School complies with its obligations under the Education (Independent School Standards) Regulations 2014 regarding the provision of toilets and washing facilities. The School does not permit children to use toilets designated for the opposite biological sex. The School has regard to the

provisions set out in Part two of KCSIE regarding single-sex spaces and changing rooms.

If a gender-questioning child does not want to use the toilet designated for their biological sex, then Head will consider whether they can provide an alternative toilet facility, without compromising the safety, privacy, comfort or dignity of that pupil or any other child.

A clear record of these situations will be kept and any decisions will be communicated to appropriate parties and regularly reviewed.

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

Management of Safeguarding – Changing rooms and showers

Eaton House School will not allow children into changing rooms or showers of the opposite sex.

Pupils aged 11 or over at the start of the academic year will not be required or permitted to undress in front of pupils of the opposite biological sex and will not use changing or shower facilities designated for the opposite sex.

Any individual arrangements will be clearly recorded, communicated to relevant staff on a need-to-know basis and reviewed regularly

Safeguarding children with medical conditions

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

Our organisation will adhere to the new statutory guidance issued by the DfE in June 2026 regarding allergy management in schools.

Please see our Allergy Management Policy for our procedures regarding pupils with known allergies.

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

Management of Safeguarding - Young Carers

A young carer is a person under 18 who provides or intends to provide care for another person. Young carers may face additional safeguarding challenges and may be more vulnerable due to the responsibilities they carry. Staff will attempt to identify any issues early on so that they receive the support and the right time and by the appropriate services including additional support from external partners, or local authority and health services where appropriate.

Mobile Phones and Generative Artificial Intelligence (AI)

The School operates as a mobile phone-free environment by default, in accordance with the DfE's

statutory guidance on Mobile phones in schools. Pupils do not have access to their mobile phones throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime, unless a clearly defined exception has been agreed by the Head.

Safeguarding concerns involving mobile phones, personal devices, mobile data, messaging applications, image sharing, online harassment or access to harmful content will be reported to the DSL and managed under this policy.

Only approved generative artificial intelligence systems may be used for educational purposes. Their use will be subject to appropriate safeguarding, data-protection, confidentiality, ethical and intellectual-property controls.

Staff and pupils must not enter confidential or identifiable information about a child into a generative AI system unless its use has been expressly authorised and the DSL, Head / Principal is satisfied that appropriate data-protection safeguards are in place.

Harmful interactions with generative AI applications, AI-generated explicit imagery, deepfakes, manipulation, bullying or any other AI-related safeguarding concern will be reported to the DSL without delay.

Please see a separate Mobile Phone Policy for further information.

Cybercrime

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

Cyber-dependent crime continues to represent one of the most significant and rapidly evolving threats within the United Kingdom's (UK) crime landscape. Offences under the Computer Misuse Act 1990 (CMA) have risen substantially.

Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure. Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DdoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.
- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into

the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Restrictive Interventions – including use of Reasonable Force

New regulations The Schools (Recording and Reporting of Seclusion and Restraint) (No.2) (England) Regulations 2025 and amendments to the Education and Inspections Act 2026 came into force on 1st April 2026.

There are limited circumstances when it is appropriate for staff in schools to use 'reasonable force' to safeguard children.

Please refer to our organisations Behaviour policy for more guidance on restrictive interventions and use of force.

Management of Safeguarding: Children from Social Care

The DSL will work with the Head/Principal, the designated teacher and relevant strategic leads to promote the educational outcomes of children who have, or have had, a social worker.

The DSL will understand the welfare, safeguarding and child protection issues affecting these children and consider the impact that these experiences may have on their attendance, engagement, behaviour, progress and achievement.

This will include:

- maintaining an up-to-date overview of children who have, or have had, a social worker, including their attendance, progress and attainment.
- promoting a culture of high aspirations and expectations for these children.
- supporting staff to provide appropriate academic support, pastoral intervention and reasonable adjustments.
- recognising that the impact of abuse, neglect or other adverse experiences may continue after statutory social care involvement has ended; and
- working with children's social care, the Virtual School Head and other relevant professionals, where appropriate, to improve attendance, engagement and educational outcomes.

Appendix 3: External Agency Contact Information

Kensington and Chelsea Safeguarding Key Contacts

To report a concern about a child or young person	Kensington and Chelsea Duty Line Telephone: 020 7361 3013 Out of hours: 020 7361 3013
Multi Agency Safeguarding Hub (MASH)	Karen Duncan, Tri-borough MASH Business Support Officer Telephone: 020 7641 3991 Email: kduncan1@westminster.gov.uk Dhruva Vashee, Tri-borough MASH Business Support Officer Telephone: 07866 077169 Email: dvashee@westminster.gov.uk Menna Emmanuel, Specialist Community Public Health Nurse: Telephone: 020 7641 5498 Email: menna.emmanuel@nhs.net Debra Cox, Specialist Health Practitioner in MASH: Telephone: 020 7641 3485 Email: Debra.Cox@nhs.net
For case consultations, advice, guidance from the Safeguarding Teams in Children's Social Care	For case consultations or follow-up enquiries please contact the Duty Child Protection Adviser in the first instance telephone 020 7361 3013. Layla Sachu, Family Support and Child Protection Adviser Email: layla.sachu@rbkc.gov.uk Anna Richards, Family Support and Child Protection Adviser Mobile: 07974 613 180 Email: anna.richards@rbkc.gov.uk Sarah Mangold, Interim Service Manager for Safeguarding, Bi-Borough Mobile: 07984 016 841 Email: sarah.mangold@rbkc.gov.uk
Safeguarding, Review and Quality Assurance	Angela Flahive, Head of Safeguarding, Review and Quality Assurance Telephone: 020 7361 3467 Mobile: 07971 320 888 Email: angela.flahive@rbkc.gov.uk
Local Authority Designated Officer (LADO / Management of Allegations)	Kensington and Chelsea Please contact duty LADO for consultations and referrals Telephone: 020 7361 2120 Email: KCLADO.Enquiries@rbkc.gov.uk Aqualma Daniel, Safer Organisations Manager & Local Authority Designated Officer Telephone: 07870 481 712 Email Aqualma.Daniel@rbkc.gov.uk Sally Smith, LADO Manager Royal Borough of Kensington and Chelsea / City of Westminster Tel: 07967 764 794 Email: Sally.Smith@rbkc.gov.uk
Safeguarding Lead for Schools and Education	Elaine Campbell, Bi-borough Safeguarding Lead for Schools and Education Telephone: 020 7361 3000 Mobile: 07712 236 508 Email: elaine.campbell@rbkc.gov.uk

Child Exploitation Lead	Sarah Stalker, Child Exploitation Lead, (Monday, Tuesday, Wednesday and Thursday) Telephone: 020 7598 4640 Mobile: 07971 322 482 Email: sarah.stalker@rbkc.gov.uk
Prevent (Radicalism and Extremism)	Contact the LBHF/ RBKC Prevent team on: Telephone: 020 8753 5727 Email: prevent@lbhf.gov.uk
Education and Attendance	Wendy Anthony, Bi-borough Head of Admissions and Access to Education Telephone: 020 7745 6440 Email: wendy.anthony@rbkc.gov.uk
LSCP Business Managers	Emma Biskupski Telephone: 07779 348 094 Email: Emma.biskupski@rbkc.gov.uk

Westminster Safeguarding Key Contacts

Safeguarding, Review and Quality Assurance	Angela Flahive, Head of Safeguarding, Review and Quality Assurance Telephone: 020 7361 3467 Mobile: 07971 320 888 Email: angela.flahive@rbkc.gov.uk
Local Authority Designated Officer (LADO / Management of Allegations)	Please contact duty LADO for consultations and referrals Telephone: 020 7361 2120 Email: LADO@westminster.gov.uk Aqualma Daniel Safer Organisations Manager & Local Authority Designated Officer Tel : 07870 481 712 Email Aqualma.Daniel@rbkc.gov.uk Sally Smith LADO Manager Royal Borough of Kensington and Chelsea / City of Westminster Tel: 07967 764 794 Email: Sally.Smith@rbkc.gov.uk
Safeguarding Lead for Schools and Education	Elaine Campbell, Bi-Borough Safeguarding Lead for Schools and Education Tel: 020 7361 3000 / Mobile: 07712 236 508 Email: elaine.campbell@rbkc.gov.uk
Child Exploitation Lead (Children's Services)	Emily Harcombe, Child Protection Adviser Email: eharcombe@westminster.gov.uk
Prevent (Radicalism and Extremism)	Kiran Malik Prevent Programme Manager, Westminster enquiries only Telephone: 020 7641 5071 Email: kmalik@westminster.gov.uk
Education and Attendance	Wendy Anthony Bi-Borough Head of Admissions and Access to Education Telephone: 020 7745 6440 Email: wendy.anthony@rbkc.gov.uk

Wandsworth Safeguarding Key Contacts

LADO (Local Authority Designated Officer) Anita Gibbons Tel: 07974 586461
Email: LADO@wandsworth.gov.uk

Service Manager (Safeguarding) Kamilah McCalman
Tel: 07890 947008
Email: Kamilah.McCalman@richmondandwandsworth.gov.uk

MASH (Multi Agency Safeguarding Hub)
Tel: 020 8871 6622
Tel: 020 8871 6000(out of hours, evenings & weekends)
Email: mash@wandsworth.gov.uk
Multi-agency Referral Form (MARF)

Wandsworth Safeguarding Children Partnership (WSCP) Tel: 020 8871 7401
Email - wscb@wscb.org.uk Website www.wscb.org.uk