



ST BENEDICT'S SCHOOL
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Child Protection and Safeguarding Policy

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1. Introduction

This policy is available on the website and applies to all members of staff including volunteers and governors. It has regard to [Keeping Children Safe in Education](#) (2026) (KCSIE), [Working together to Safeguard Children](#) (2026) (WT), and [Prevent Duty Guidance: For England and Wales](#) (July 2023) (Prevent) as well as a number of other documents outlined in appendix 7 of this policy.

Safeguarding is defined by KCSIE as:

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

A 'child' is taken to be someone under 18 although of course the school will continue to fully support the welfare of all students when they become 18.

KCSIE makes the point that when defining 'victim' 'it is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a 'victim.' In addition, it notes that in using the term 'perpetrator' 'schools and colleges should think very carefully about terminology, especially in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well'.

Key safeguarding contact details for this policy

Within school

Confidential shared (by DSLs) safeguarding mailbox: dsl@stbenedicts.org.uk

School telephone numbers:

020 8862 2050 (Junior School)

020 8862 2000 (Senior School)

Mr M Foley: Senior DSL; Deputy Head Pastoral; 020 8862 2012

Mrs A Yue: Head of Student Wellbeing and Senior Deputy DSL, Senior School Nurse: 020 8862 2044

Mr P McCarthy: Senior Deputy Head & Deputy DSL: 020 8862 2024

Ms L Powell: DSL for Key Stage 2 and Assistant Head: 020 8862 2056

Mrs M Edwards: DSL Key Stage 1 and EYFS and Head of Pre Preps and Nursery: 020 8862 2460

Ms A Loaiza-Palacio: Senior School Counsellor, Mental Health Lead for Senior and Junior School, Deputy DSL: 020 8862 2000

Mr R Simmons: Headmaster, Junior School; Deputy DSL: 020 8862 2054

Mr J Smith: Head, Senior School: 020 8862 2010

Mr A Chatterjee: Designated Safeguarding Governor: 020 8862 2075

Mr M Davis: Chair of Governors: 020 8862 2075

Mr R Poffley: Clerk to the Governors: 07921 155008

Ms D Burke: Junior School Nurse: 020 8862 2060

Should a parent wish to make a complaint about how a safeguarding matter has been handled, they should follow the procedure set out in the school's Complaints Policy, which can be found on the school website.

External Agencies

Local Area Designated Officer (LADO), Emmanuel Adofo, asv@ealing.gov.uk, 020 8825 8930

Website: <https://www.egfl.org.uk/services-children/safeguarding/child-protection/staff-allegations>

Ealing Children's Integrated Response Service (ECIRS): Perceval House, 2nd Floor Blue Area, 14-16 Uxbridge Road, Ealing, W5 2HL. Tel: 020 8825 8000 ecirs@ealing.gov.uk.

Website:

https://www.ealing.gov.uk/info/201183/information_for_professionals/1301/ealing_childrens_integrated_response_service

Children Missing Education: 020 8825 5517, cme@ealing.gov.uk

<https://www.egfl.org.uk/services-children/ealing-childrens-integrated-response-service-ecirs-referrals>

Family Information Service (FIS): Tel: 020 8825 5588. EHAP@ealing.gov.uk Website:

<https://www.egfl.org.uk/services-children/early-help-assessment-and-plan-ehap>

Prevent Coordinator: 020 8825 8895 (Office hours 9am-5pm). For non-emergency local police dial 101

Child Protection Advisors (CPA): Ealing Children's Social care advice: 020 8825 8930

Ealing Police: Safer Neighbourhoods team: [Contact your local policing team | Metropolitan Police](#)

Early Help Assessment and Plan (EHAP): 020 8825 5588 (Mon-Fri 9-5pm)

Ealing Service for Children with Additional Needs (ESCAN): Carmelita House, 21-22 The Mall, Ealing W5 6PJ; 020 8825 8700; carmelitahouse@nhs.net.

SAFE 0-18: Supportive Action for Families in Ealing: 020 8825 8000, ECIRS@ealing.gov.uk

Lucinda Poole, School Attendance Service Manager: 020 8825 5768; lpoole@ealing.gov.uk

The Ealing Safeguarding Children Partnership with information and guidance can be found at:

<https://www.ealingfamiliesdirectory.org.uk/kb5/ealing/directory/escb.page?escbchannel=0>

National Department for Education (DfE) helpline and mailbox: for non-emergency advice for staff and Governors: 020 7340 7264

London Safeguarding Children Partnership: <https://www.londonscp.org.uk/>

OFSTED: Piccadilly Gate, Store Street, Manchester, M1 2WD, 0300 123 1231, enquiries@ofsted.gov.uk

NSPCC: 42 Curtain Road, London, EC2A 2NH, 0808 800 5000

Childline: 0800 1111

2. Staff Responsibility for Safeguarding

The governors of St Benedict's have strategic leadership responsibility for safeguarding arrangements at the school to facilitate a whole school approach to safeguarding that involves everyone in the school so that it is at the forefront, underpinning all relevant aspects of process and policy development with the child's wishes and feelings always taken into account. All governors have safeguarding training at induction, including online safeguarding, which is updated regularly and equips them to provide strategic challenge and to test and assure themselves that the school's safeguarding policies and procedures are effective, to equip them with the strategic understanding to work with the Head and Designated Safeguarding Leads (from here on DSLs), including an understanding of local multi-agency safeguarding arrangements. This means they can assure themselves that there are clear safeguarding systems in place, (including online safety and ensuring that the effectiveness of filtering and monitoring systems is reviewed at least once every academic year, including checks that filtering is working appropriately on all internet-connected devices in all relevant locations and that a record is kept of these checks), as set out in this policy, that are well promoted, easily understood and easily accessible for children to confidently report abuse knowing their concerns will be treated seriously and that they can safely express their views and give feedback. The policy recognises that while all children should be protected some groups of children are potentially at greater risk of harm. The governors will also ensure that the school promotes an inclusive, anti-discriminatory culture in which racism, faith-based prejudice, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities.

KCSIE paras 88–103 make explicit the obligations of governors under the Human Rights Act 1998 and Equality Act 2010 and explain the Public Sector Equality Duty (PSED). KCSIE states that compliance with the PSED is a legal requirement for state-funded schools and colleges. This reinforces their safeguarding duties, for instance noting that governing bodies 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, with a link to [Equality Act 2010: advice for schools](#).

Following this guidance, St Benedict's School both in its policies and actions does "take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need". KCSIE also makes clear that this provision for positive action is distinct from the separate duty to make reasonable adjustments for disabled children and young people (KCSIE para 95). KCSIE additionally emphasises the importance of schools remaining aware that particular pupils may be disproportionately vulnerable to different forms of harm or bullying and of integrating this awareness into safeguarding policies, procedures and guidance. Good record-keeping and monitoring of all forms of abuse and harassment is an important part of this approach.

All staff at the school know that safeguarding and promoting the welfare of children is everyone's responsibility. Staff in schools are in a particularly important position as they can identify concerns early on, provide help and prevent concerns from escalating. All members of staff at St Benedict's have a responsibility to provide a safe environment in which children can learn, and in their actions, they must always consider what is in the best interests of each student, working with a child-centred approach. Staff understand that children can be at risk of harm in school and out of school, at home or online. The wishes of the child will be taken into account when determining action to be taken and services to provide. Children are actively encouraged to raise concerns and are taught about safeguarding by covering relevant issues throughout their time at St Benedict's both in our PSHE course, tutor time and, where appropriate, in academic lessons.

KCSIE para 16 emphasises that "staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected" as they may feel embarrassed, humiliated or be threatened, or they may not recognise their experience as harmful. KCSIE also highlights that difficulties in communicating concerns may be connected with a child's vulnerability, disability and/or sexual orientation or with language barriers. It states that this should not prevent staff from having 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. Staff training at St Benedict's places great emphasis on developing this professional curiosity and building relationships with children.

Perhaps most importantly, all staff must maintain an attitude of “it could happen here” when it comes to potential safeguarding concerns. It is important that all members of staff play a part in identifying concerns, sharing information and taking prompt action so that all children receive the right help at the right time to address risks and prevent issues escalating. Data protection concerns should not be a barrier to sharing information where failure to do so would result in a child being placed at risk of harm. KCSIE 2026 defines relevant data protection laws as including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Research and local child safeguarding practice reviews show the dangers of failing to take effective action, with poor practice including failing to act on and refer the early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; sharing information too slowly; and not challenging those who appear not to be taking action. Safeguarding training includes understanding the importance of online safeguarding including understanding the school’s own filtering and monitoring system for computers and staff roles and responsibilities in respect of this (see Appendix 3).

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

All school staff should be prepared to identify children who might benefit from additional support, including Family Help. Contextual safeguarding is emphasised in KCSIE. Staff, especially DSLs, need to be aware that safeguarding behaviours or incidents can be associated with factors outside school. Staff should always consider whether children are at risk of abuse or exploitation in these situations, particularly if happening outside their families. Extra-familial harms take a variety of forms, including sexual abuse, harassment and exploitation; domestic abuse within children’s own intimate relationships, including physical, sexual and emotional abuse and stalking; criminal exploitation, including financial exploitation; serious youth violence; county lines; and radicalisation. Child Sexual Exploitation and Child Criminal Exploitation remain particularly important examples and are explained below.

Any staff member with concerns about a child’s welfare should pass on their concerns to a DSL, although they can make a referral themselves. Our staff are important in providing support before statutory intervention, including universal services and community-based Early Help and the targeted early help level of Family Help, to students with safeguarding issues so that as soon as a problem emerges, support will be provided as quickly as possible. Staff training ensures that staff are aware of the process for community-based Family Help assessments, including the targeted early help level of Family Help under sections 10 and 11 of the Children Act 2004, and of the criteria for referrals to local authority children’s social care and statutory services under sections 17, 20, 31 and 47 of the Children Act 1989. They are also trained to be aware of the different types of abuse, neglect, exploitation and modern slavery so that they can identify cases of children who might be in need of help or protection.

To ensure that all members of staff understand their safeguarding responsibilities Part 1 of Keeping Children Safe in Education (KCSIE) must be read **in full** by all staff and followed by the governing body and all staff, including volunteers, in the school. School leaders and those staff who work directly with children should also read Annex A, which contains important additional information about specific forms of abuse, exploitation and safeguarding issues. All staff are given a copy of Part 1 during their induction as well as the school’s Child Protection and Safeguarding Policy, including policy and procedures to deal with child-on-child abuse, including harassment and violence, the staff Code of Conduct, including information relating to low-level concerns, allegations against staff and whistleblowing, the school’s Behaviour Policy, including measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying, and the school’s safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods. Safeguarding training, including Prevent awareness and online safety, is also part of all staff induction which looks at the school safeguarding policy and the role of the DSLs. There is also annual training in safeguarding, including online safety, in place for all staff so that they can understand and discharge their safeguarding responsibilities as well as more regular updates through training, email and bulletins throughout the year. Governors also receive appropriate safeguarding and child protection training, including online safeguarding, at induction, with this training updated regularly. Temporary, voluntary and new staff who work in school are given separate training if they have not attended the annual training at the start of the year. The HR department keeps a central record of all safeguarding training undertaken by members of staff and others. With all training the governors have regard to Teachers’

Standards which set out the expectations that all teachers manage behaviour effectively to ensure a good and safe educational environment and require all teachers to have a clear understanding of the needs of all pupils.

The governors work with the Head and Head of PSHE to ensure that all students in all year groups are taught PSHE in a curriculum which teaches them how to keep themselves and others safe, including online, alongside appropriate Relationships and Health Education and Relationships, Sex and Health Education. Teaching should have regard to the revised statutory guidance introduced from September 2026. There is a separate PSHE policy on the school's website.

It is recognised that effective education is tailored to specific needs so children with particular vulnerabilities such as SEND or victims of abuse will be considered appropriately in how they are taught to give them a more personalised and contextualised approach, for instance with 1:1 support in some topics and being allowed to work separately when there are topics which might be difficult for them to participate in with the rest of their class. The statutory guidance on RSE can be found [here](#) and further resources can be found in paragraphs 158–162 of KCSIE. The PSHE curriculum is a key part of preventative education that ensures that St Benedict's has a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour and other forms of physical violence and conflict (KCSIE para 160). This is reflected in our behaviour and bullying policies and practice.

3. Types of Abuse, Neglect and Exploitation

Knowing what to look for is vital in the early identification of abuse, neglect, exploitation and modern slavery. Further information can be found in [What to do if you are worried a child is being abused – Advice for practitioners](#). All staff should be particularly alert to the potential need for additional support, including universal services and community-based Early Help or the targeted early help level of Family Help, for a child who:

- Is disabled / has certain health conditions / has specific additional needs
- Has a Special Educational Need or Disability (SEND), whether or not they have an Education, Health and Care Plan
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is a privately fostered child
- Is at risk of being radicalised into terrorism
- Is frequently missing or goes missing from education, home or care
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, association with organised crime groups or county lines
- Is misusing alcohol or other drugs themselves
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation (FGM) or Forced Marriage
- Has a parent or carer in custody, or is affected by parental offending
- Is in family circumstances presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school, or is in Alternative Provision or a Pupil Referral Unit
- Is at risk of exploitation/ modern slavery/ trafficking, including sexual and/or criminal exploitation

In all cases, if staff members are unsure, they should always speak to one of the DSLs.

All staff should be aware that abuse, neglect, exploitation 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. Children can be at risk of harm inside and outside school, inside and outside the home and online. Safeguarding incidents can be associated with factors outside school, and all staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms can include sexual abuse, including harassment and exploitation; domestic abuse in children's own intimate relationships, sometimes referred to as teenage relationship abuse, including physical, sexual and emotional abuse and stalking; criminal exploitation, including financial exploitation; serious youth violence; county lines; radicalisation. In addition, staff should be vigilant about domestic abuse, which can have a particularly serious and long-lasting emotional and psychological impact on children. Advice on this can be found at [NSPCC – Domestic abuse](#).

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently online and offline. Children can also abuse other children online. This can take the form of abusive, harassing and misogynistic or misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography with those who do not want to receive such content. Staff should also be aware of the developing safeguarding risks associated with generative AI. Nudes and semi-nudes may be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'. Online risks may also involve harmful interaction with generative AI applications and the making, sending or receiving of explicit images generated using AI.

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. Harm can include ill-treatment that is not physical as well as the impact of witnessing the ill-

treatment of others. This is particularly relevant to domestic abuse, including where children see, hear or experience its effects. 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. At St Benedict's we ensure that children are aware of forms of online abuse as part of their PSHE programme of study.

Staff training ensures that staff are also aware that children are capable of abusing other children. Children may also cause harm to other family members, often referred to as child-to-parent or care-giver abuse.

Possible signs of abuse include, but are not limited to:

- The pupil says they have been abused or asks a question which gives rise to that inference
- There is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; or there is a pattern to the injuries
- The pupil's behaviour stands out from the group as either being extremely compliant or extremely challenging, or there is a sudden change in the pupil's behaviour
- The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- The pupil's development is delayed or they lose or gain weight
- The pupil appears neglected, for example dirty, hungry or inadequately clothed
- The pupil is reluctant to go home or has been openly rejected by their parents or carers
- The pupil is reluctant to go to school

Children may also experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences can affect a child's welfare, wellbeing, mental health and sense of safety, and may make a child less willing to seek help. All staff should be alert to the signs and impact of prejudice-based harm and must ensure that such concerns are reported to the DSL (or a deputy) and considered within the school's safeguarding practice, not solely as a behavioural matter.

Physical Abuse

This 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.

Possible signs of Physical Abuse include:

- Children may seek to conceal injuries by keeping their arms and legs covered or being reluctant to change for sport
- Injuries which do not match the explanation given for them
- Bruises in places where you would not normally expect to find them, in soft tissue, for example, rather than on a bony prominence
- Bruises which have a distinctive shape or pattern, such as handprints, grasp or finger marks or belt marks
- Burns or scalds with clear outlines
- Bite marks and bruises such as love-bites
- Bruising in or around the mouth

Emotional Abuse

This is the persistent emotional maltreatment of a child such as to cause severe adverse effects on the child's emotional development. It is more than just occasional criticism. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling or name-calling, and it may include not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection

and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyber-bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Possible signs of Emotional Abuse include:

- The child might become withdrawn, nervous, unhappy or lacking in confidence. It may result in a child being unable to make friends, perhaps because they behave aggressively or inappropriately towards other children
- The child is continually depressed and withdrawn
- Runs away or is frightened to go home or is reluctant to attend school
- Is persistently blamed for things that go wrong
- Is made to carry out tasks inappropriate to their age
- Is not allowed to do normal childhood activities
- Displays excessive fear of their parents or carers
- Is excessively clingy and tearful

Sexual Abuse

The key elements in any definition of sexual abuse are the betrayal of trust and responsibility and the abuse of power for the purpose of the sexual gratification of the abuser. Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), or non-penetrative acts such as masturbation, kissing, rubbing and touching over clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the school's policy and procedures for dealing with it (see Part 9 of this policy).

The abuser may use different ways to persuade the child to cooperate such as bribery, threats or physical force. Sexual abuse can take different forms, from touching to intercourse, and often does not cause any outward signs of physical injury. It can happen to boys as well as girls and to children of any age, from birth to 18 years old. Sexual abuse can have long-lasting effects. Children who display harmful sexual behaviour may themselves have experienced abuse or trauma and it is important that they are offered appropriate support. Additional advice and support can be found with the [Centre of Expertise on Child Sexual Abuse](#).

Possible signs of sexual abuse include:

- The child exhibits sexually explicit behaviour
- Has inappropriate sexual knowledge for their age
- Attempts suicide or self-inflicts injuries
- Repeatedly runs away from home

Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not.

There are specific offences for children under 13, who can never provide valid consent to sexual activity, and specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Neglect

Neglect is 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, for example as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter, including exclusion from home or abandonment; protect a child from physical and emotional harm or danger; ensure adequate supervision, including the use of inadequate caregivers; or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible signs of neglect include:

- The child is constantly hungry, greedy or stealing food
- Has lingering illnesses which have not been treated
- Is continually smelly, scruffy and dirty
- Is often dressed in inadequate or unsuitable clothing for the weather conditions
- Suffers repeated accidents, suggesting a lack of proper supervision
- Is constantly tired
- Does not respond when given attention or, on the other hand, craves attention and affection from any adult

Domestic Abuse

Children can be victims of domestic abuse in their own right. The Domestic Abuse Act 2021 recognises children as victims where they see, hear or experience the effects of domestic abuse. The Act introduced the statutory definition of domestic abuse. The statutory definition captures different types of relationships, including ex-partners and family members, and a range of abusive behaviours including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person carrying out the behaviour and the person towards whom it is directed must be aged 16 or over and must be "personally connected" within the meaning of the Act. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child-to-parent or care-giver abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long-lasting emotional and psychological impact on children, as well as affecting their health, wellbeing and ability to learn. 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.

St Benedict's is part of Operation Encompass, the information-sharing scheme between the police and relevant education settings which operates across all police forces in England and Wales. Since November 2025 there has been a statutory duty on the police to notify a child's education setting, and where relevant the local authority, where they have reasonable grounds to believe that a child may be a victim of domestic abuse. This includes children connected to a household where police have attended a domestic abuse incident whether or not the child was physically present at the incident. The duty applies to registered independent schools as well as maintained schools, academies and other specified education settings.

This ensures that the school has up-to-date relevant information about the child's circumstances and can enable timely and immediate support to be given to the child according to their needs. Operation Encompass does not replace normal safeguarding procedures or referrals to local authority children's social care where these are

required. Notifications contain personal and sensitive information and must therefore be kept confidential and secure in accordance with data protection law. The DSL is likely to act as the school's Key Adult for Operation Encompass notifications and will ensure that appropriate safeguarding action, recording and referrals are undertaken.

The National Domestic Abuse Helpline is run by Refuge and can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time for a call from the team can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available from the NSPCC, Refuge, SafeLives and Operation Encompass.

4. What to do if a Member of Staff has a Safeguarding Concern about a Child

If a member of staff has any safeguarding concern, they should act upon it straight away. They should follow the procedures set out in this policy and speak to a DSL or deputy. Where a child is suffering, or is likely to suffer harm, a referral to local authority Children's Social Care and, if appropriate, the police must be made immediately. Referrals should follow the local referral process. Guidance for this can be found in [What to do if you are worried a child is being abused – Advice for Practitioners](#).

All safeguarding concerns about children must be reported promptly to a DSL or deputy. Depending upon the circumstances and level of need, the response may include managing support for the child internally through the school's pastoral processes, undertaking or contributing to a Family Help assessment, or making a referral to statutory services. Where a referral to local authority Children's Social Care is required for a child living in Ealing, this will normally be made through Ealing Children's Integrated Response Service (ECIRS), the single point of contact for safeguarding concerns in Ealing, on 020 8825 8000, or through the relevant Children's Social Care service where the child lives in another Local Authority. Nothing in this procedure prevents a member of staff making a referral directly where necessary.

When a member of staff suspects or hears a complaint of abuse they must:

- Listen carefully to the child and keep an open mind. Staff must not take a decision as to whether or not abuse has taken place. Staff should understand that they are not making a diagnosis when receiving concerns, just taking them down to be passed on. It could be that signs of abuse noted in Part 3 do not constitute proof in themselves. Staff should recognise the significance of having been chosen as a person in whom the child has placed their trust and respond with empathy. They should be aware that an initial disclosure may not reflect the full extent of abuse and that trauma can affect memory and the child's ability to give a complete or chronological account
- Listen carefully, reflect back using the child's own language, avoid judgement and ask only open-ended questions where clarification is necessary, such as 'where?', 'when?' or 'what happened?'. Leading questions which suggest their own answer should be avoided. KCSIE makes clear, however, that staff may ask a child whether they have been harmed and what the nature of that harm was
- Reassure the child that they are being taken seriously but explain that a guarantee of confidentiality cannot be given. The member of staff should explain that, while maintaining an appropriate level of confidentiality, they need to pass the information on to the DSL or, where appropriate, Children's Social Care. Information should be shared only with those people who need to know in order to safeguard and support the child, and the child should be told, as far as is appropriate, what will happen next and with whom the information will be shared
- Keep a written record of the conversation. This should include the date, time and place of the conversation, the essence of what was said and done, by whom and in whose presence. It is also useful to describe observable behaviour such as crying or shaking, although this should not be interpreted. Wherever possible, the actual words spoken by the child should be recorded. This should be signed by the person making the written record and should use names, not initials. The record must be kept securely and handed to the DSL. Ideally, the member of staff should wait until the end of the conversation before making a detailed written account so that they can give the child their full attention. Where notes are taken during the conversation, care should be taken to remain engaged with the child and not appear distracted. The record should contain what the child has said without interpretation or personal opinion. MyConcern is the school's system for securely recording safeguarding concerns. The record should provide a clear and comprehensive summary of the concern and subsequent safeguarding records should include details of follow-up, actions, decisions, the reasons for those decisions and outcomes. Any original notes or other relevant records should be retained securely as appropriate
- Preserve any evidence which is given, for instance scribbled notes, mobile phones with messages on them, clothing or computers. Where a report includes an online element, staff must not view or forward illegal images of a child. Where viewing an image is unavoidable, the relevant UKCIS guidance on sharing nudes and semi-nudes must be followed. In appropriate circumstances a device may need to be confiscated in order to preserve evidence and handed to the police for inspection. Staff must not copy, print, share, store or otherwise unnecessarily reproduce illegal images

Early information sharing is vital and staff should not assume that another colleague or professional will take action or share information that might be critical in keeping a child safe. No single professional can have a full picture of a child's needs and everyone who comes into contact with them has a role to play in identifying concerns. Data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare, and fears about sharing information must not be allowed to stand in the way of safeguarding a child. KCSIE 2026 uses the term 'data protection laws' to include the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Information shared should be relevant to the current safeguarding risk, necessary for the recipient to know, clearly presented and appropriately contextualised. Professional judgement should be used to ensure that information sharing is focused and proportionate, while ensuring that information relevant to understanding or managing safeguarding risk is not omitted. Information may be shared without consent where there is good reason to do so in order to safeguard a child. Further information is provided in Section 7.

All suspicions or complaints of abuse concerning a child must be reported to one of the DSLs. If the concern relates to the conduct of the DSL as a member of staff, the procedure below for safeguarding concerns or allegations about members of staff should be followed. If a DSL is not available, this should not delay appropriate action being taken by any member of staff. Staff should consider speaking to a member of the Senior Leadership Team and/or taking advice directly from local authority Children's Social Care. Anyone can make a referral. Where action has been taken without the involvement of a DSL, the DSL should be informed as soon as practically possible.

Safeguarding concerns or allegations about members of staff, including supply staff, trainee teachers, volunteers and contractors, follow a different reporting route. Any such concern or allegation, no matter how small, must be reported to the Head, who will consider whether onward referral to the LADO is required. A concern or allegation about the Head must be referred to the Chair of Governors/proprietor in accordance with the school's allegations procedure. Concerns which do not meet the harm threshold will be dealt with under the school's low-level concerns policy.

The DSL will:

- Look at the child's pastoral/safeguarding record on MyConcern
- Consider the appropriate safeguarding response, which may include managing support through the school's own pastoral processes, undertaking or contributing to a Family Help assessment, or referring the child to statutory services
- Make a referral if not already made by a member of staff and, if a referral by phone has been made, complete any required written referral documentation for ECIRS or the relevant Children's Social Care service if the child lives in a different Local Authority. Allegations against staff will be dealt with separately under the procedure above and the relevant section of this policy
- Consider whether parents or carers should be informed in order to support the child's wellbeing, provided that doing so would not place the child at additional risk. Where a referral to local authority Children's Social Care is made, parents or carers will generally be informed unless there are compelling reasons not to do so, for example where informing them may place the child at additional risk. Where appropriate, such a decision should be made with the support of Children's Social Care. The absence of parental consent does not in itself prevent information being shared where this is necessary to safeguard a child
- Provide as much relevant and necessary information as possible in a referral, particularly as the referral should consider whether children are being harmed in contexts outside the home. The information provided should be sufficient to allow Children's Social Care to consider all the available evidence and take a contextual approach to any extra-familial harm
- Support Children's Social Care and other agencies following a referral and provide further information or assistance required for any assessment
- Ensure that the referral is followed up. The local authority should acknowledge receipt and make a decision about the next steps within one working day. If this information is not forthcoming, the referrer should follow up. If, following a referral, the child's situation does not appear to be improving, consideration must be given to following the local escalation procedures so that the concerns are addressed and the child's situation improves

- Ensure that all concerns, discussions and decisions, together with the reasons for those decisions, are recorded in writing. Records should include a clear and comprehensive summary of the concern, details of how it was followed up and resolved, and a note of actions taken, decisions reached and the outcome

5. Categories of Referral to External Agencies

In all cases where referrals are made to Children's Social Care or any other external agency, any member of staff may make a referral but in the majority of cases the referral will be made by a DSL. If a referral is made by another member of staff, they will receive support from the DSL in making the referral and working with external agencies after this. The DSL or deputy will normally lead liaison with other agencies, but the absence of a DSL must never delay appropriate action or a referral. The contact details for making referrals in Ealing can be found at the start of the policy. If a child lives in a different authority, the referral will be made to that local authority.

KCSIE 2026 distinguishes between support through universal services and community-based Early Help, the targeted early help level of Family Help, and statutory Children's Social Care services. In Ealing, these national categories are implemented through the locally published [Thresholds of Need & Local Protocols for Assessment and Support](#), which currently continues to use the terms Early Help, EHAP and SAFE. Staff should use the current Ealing Thresholds of Need guidance alongside their professional judgement when deciding what level of support or referral may be required. Thresholds are indicative and do not replace professional judgement.

When safeguarding concerns emerge, the member of staff concerned/DSL should refer to the Ealing Thresholds of Need Guide, summarised as:

Level 1: No Additional Needs: Children whose needs can be met through universal services. No additional assessment is needed.

Level 2: Early Help: Children with identified or emerging needs. An Early Help Assessment and Plan (EHAP) and/or SAFE Assessment and Plan may be appropriate.

Level 3: Complex Need: Children with complex multiple needs requiring specialist and often multi-agency support. This is the threshold for referral to Children's Social Care. A Child and Family Assessment may be undertaken under section 17 of the Children Act 1989 and support may also include SAFE or other targeted services.

Level 4: Acute Need: Children with acute needs, including children suffering or likely to suffer significant harm. A referral to Children's Social Care must be made. This may result in a Child and Family Assessment and/or a section 47 Child Protection enquiry. Where there is an urgent and immediate need to protect a child, the police should be contacted on 999.

Early Help and Family Help

At Level 2 of the Ealing Thresholds, Early Help is intended to identify and respond to emerging needs as early as possible, preventing difficulties from escalating. KCSIE 2026 describes support before statutory intervention as including universal services and community-based Early Help and the targeted early help level of Family Help. Ealing's present local arrangements continue to describe this level as Early Help.

If Early Help is appropriate for a child, the referrer may liaise with the Family Information Service (FIS) to set up an Early Help Assessment and Plan (EHAP). An EHAP is used where a multi-agency approach is required and provides a single assessment through which the needs of the child and family can be identified, an action plan agreed and appropriate services coordinated. Where one service alone can successfully meet the need, an EHAP may not be required.

Before beginning an EHAP, the professional should contact the Family Information Service to establish whether an EHAP is already open for the child or their siblings. The EHAP process is voluntary and ordinarily requires the participation and consent of the family.

Any such cases will be kept under constant review and consideration given to a potential referral to Children's Social Care for assessment for statutory services if the student's situation does not appear to be improving or is getting worse. Staff may be required to support other agencies in carrying out an assessment and, where appropriate, a suitably qualified practitioner who is not a social worker may act as the lead practitioner.

Sometimes the child and their family will receive support from the SAFE team. SAFE (Supportive Action for Families in Ealing) provides targeted support to families and can be accessed through Ealing's Early Help arrangements and ECIRS.

Children in Need

At Level 3 of the Ealing Thresholds, a child may be considered in need where they are "unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or [where] a child is disabled". Where this threshold is met, a referral will be made to ECIRS for Children's Social Care to consider a statutory assessment under section 17 of the Children Act 1989.

Where needs are emerging but do not yet require statutory Children's Social Care intervention, support should be considered through the appropriate Early Help/Family Help arrangements in accordance with the Ealing thresholds. However, Early Help must not be used to delay a referral to Children's Social Care where the statutory threshold has been reached.

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable standard of health or development or whose health and development is likely to be significantly impaired without the provision of services, or a child who is disabled.

At Level 3, Ealing describes this as the threshold for referral to Children's Social Care. A social worker will normally carry out a holistic assessment under section 17 to determine what continuing multi-agency support is required. Support may include a Child in Need plan alongside services from other agencies.

Children suffering or likely to suffer significant harm

At Level 4 of the Ealing Thresholds, where a child is suffering, or is likely to suffer harm, a referral to local authority Children's Social Care must be made immediately and, where appropriate, the police should also be contacted. In Ealing this referral should be made to ECIRS. Level 4 concerns include acute needs and circumstances in which a child is suffering or likely to suffer significant harm, including concerns arising from abuse, neglect or exploitation, whether the harm is occurring within or outside the family home.

The LADO is not the referral route for a child at Level 4. Where the concern involves the behaviour of a member of staff, volunteer, trainee teacher, contractor or other adult working with children, the school's separate procedure for allegations and low-level concerns about adults must also be followed, including consideration of a LADO referral by the Head or other appropriate case manager. This must not delay any referral needed to safeguard the child.

Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. These enquiries enable them to decide whether they should take any action to safeguard and promote the welfare of the child. KCSIE 2026 states that section 47 enquiries must be initiated where there are concerns about maltreatment, including all forms of abuse, neglect and exploitation.

Children's Social Care should acknowledge receipt of a referral and decide on the next steps and appropriate response within one working day. The referrer should follow up if this information is not forthcoming. School staff should support any subsequent statutory assessment. If the child's situation does not appear to improve following a referral, the referrer should consider using Ealing's local escalation procedures to ensure that the concerns have been addressed.

There is now an ECIRS Consultation Line, 020 8825 5236, for professionals who want anonymous advice about the appropriate response, while concerns that a child has been harmed or is at risk of harm go immediately to ECIRS on 020 8825 8000, which is a 24-hour number.

6. After a Referral Has Been Made

The local authority should acknowledge receipt of the referral and make a decision within one working day of a referral being made about what course of action it is taking and should let the referrer know the outcome, determining whether:

- The child requires immediate protection and urgent action is required
- Any services are required by the child and family and, if so, what type of services
- The child is in need and should be assessed under section 17 of the Children Act 1989
- There is reasonable cause to suspect the child is suffering, or likely to suffer significant harm and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
- Further specialist assessments are required to help the local authority to decide what further action to take

Staff, generally the DSL, will follow up on a referral should information not be forthcoming within the expected one-working-day timescale. The referrer should not assume that no news means that appropriate action is being taken and should actively follow up where the outcome of the referral has not been communicated.

If social workers decide to carry out a statutory assessment, the DSL or other member of staff, with DSL support, will do everything they can to support that assessment. This may include providing further relevant information, participating in discussions or meetings and supporting the child and family as appropriate.

If universal services, community-based Early Help, Family Help or other non-statutory support is appropriate, the case will be kept under constant review and consideration given to a referral to local authority Children's Social Care for statutory assessment if the child's situation does not appear to be improving or is getting worse.

In particular, if after referral the student's situation does not appear to be improving, the DSL or person who made the referral will consider following the local escalation procedures to ensure that the concerns have been properly addressed and, most importantly, that the child's situation improves.

Whatever the outcome of a referral, the DSL will coordinate appropriate ongoing support for the child in school in conjunction with Children's Social Care and any other agencies involved, where appropriate. The school will continue to consider the child's safeguarding, welfare and educational needs and will not regard the making of a referral as bringing its own safeguarding responsibilities to an end.

7. Record Keeping

All concerns, discussions and decisions made in relation to safeguarding concerns and the reasons for those decisions should be recorded in writing. These records should be put onto MyConcern, the school's safeguarding database, as these records constitute a separate child protection file that is secure and confidential and can only be accessed by the relevant teachers – senior pastoral leaders, the relevant Division Head and the Tutor, with access permissions calibrated according to role so that individual members of staff can see only the safeguarding information which they need in order to support the child appropriately. The DSL team retains access to the full safeguarding record and determines the appropriate level of access for other staff. If in doubt about recording information, staff should always discuss with a DSL or deputy. Safeguarding records may contain special category personal data and other highly sensitive personal information and must be handled, stored and shared securely and in accordance with data protection laws. These MyConcern records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions made (including the reason for such decisions, including where the decision is taken to make / not make a referral to an external agency) and the outcome. Safeguarding records should be clear and factual and should distinguish between observed concerns, professional opinion and historic information.

Information about children's welfare may be shared with others outside the school to help keep children safe from harm and promote their welfare. Where appropriate and safe to do so, the school will normally seek to be open with parents or carers about information that is being shared. However, parental consent is not always required before safeguarding information is shared. Information may be shared without consent where there is a good reason to do so in order to safeguard a child, including where it is not possible or reasonable to obtain consent or where seeking consent could place the child at risk.

Where the serious harm test under data protection legislation is met, the school will not provide a pupil's personal data in response to a Subject Access Request and will take advice where the position is unclear.

Data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. KCSIE 2026 uses the term 'data protection laws' collectively to refer to the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Safeguarding of children and individuals at risk is a processing condition which may allow special category personal data to be shared where necessary and appropriate. Please refer to our Data Protection Policy for further information.

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. Staff should be proactive in sharing safeguarding information as early as possible where this is necessary to identify, assess or respond to risks or concerns. When deciding what information to share, consideration should be given to whether the information is relevant to the safeguarding risk, necessary for the recipient to know, clearly presented and appropriately contextualised. Professional judgement should be used to ensure that information shared is focused and proportionate, while ensuring that information relevant to understanding or managing safeguarding risk is not omitted.

The DSL will document information-sharing decisions and actions taken. Further guidance is available in [**Working Together to Safeguard Children, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers, the Information Commissioner's Office guidance on sharing information to safeguard children and young people**](#), and the [**DfE's Data Protection Toolkit for Schools**](#). Information sharing will form part of safeguarding training for staff. All staff separately have training in handling personal information in accordance with the school's data protection obligations.

When a child leaves St Benedict's, including through an in-year transfer, the DSL or deputy will ensure that the child protection file is transferred to the new school or college as soon as possible and within five days for an in-year transfer, or within the first five days of the start of a new term. The child protection file must be transferred separately from the main pupil file, using secure arrangements, and confirmation of receipt must be obtained.

The information transferred should include a clear, structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs. Current safeguarding concerns should be clearly

distinguished from historic information so that previous concerns are not presented without appropriate context. Where a file contains extensive historic information, a concise summary of current risk and relevant context should accompany the records. Where appropriate, the DSL should also consider sharing relevant safeguarding information with the receiving school in advance of the child's transfer so that support and any necessary risk management can be in place when the child arrives.

Recording and reporting use of reasonable force, seclusion and restraint

St Benedict's approach to behaviour is built on prevention, relationships and de-escalation. Restrictive interventions are rare at the school and are always a last resort, used only where necessary to keep a student or others safe. Staff are trained to defuse situations long before physical intervention is considered, and the school's practice is that such incidents should be exceptional. Corporal punishment, and the threat of it, are prohibited.

Where an incident does occur, the law requires it to be recorded and reported. In recording and reporting incidents, the school has regard to the DfE guidance [Restrictive interventions, including use of reasonable force in schools](#). The following definitions are those used in the [Schools \(Recording and Reporting of Seclusion and Restraint\) \(No. 2\) \(England\) Regulations 2025](#), and are set out here so that staff can recognise when the recording duty applies. They describe the statutory test, not the school's practice.

A student is secluded where staff (including supply staff and volunteers) detain that student in a place apart from any other person, other than the member(s) of staff, otherwise than as a disciplinary penalty. This includes physically obstructing a student's way out, securing the place so the student cannot leave, or causing the student to believe they will be punished if they leave.

A student is restrained or immobilised where staff restrict the student's movement otherwise than as a disciplinary penalty. In practice, this is most likely to mean briefly holding a student to prevent injury. The statutory definition also includes binding a student's body or securing a student to a fixed or heavy object; such actions would never be appropriate at St Benedict's and would be treated as a serious staff conduct matter. Staff should note in particular that restraint does not require physical contact: depriving a student of an auxiliary aid they use to move, for example moving or withholding a walking aid or wheelchair, however briefly or well intentioned, falls within the definition and must be recorded.

Recording. Any incident involving the use of reasonable force, seclusion or restraint is recorded in writing on MyConcern as soon as is practicable, and ideally the same day. This applies even where the intervention forms part of an agreed behaviour support plan. The record includes as a minimum: the name(s) of the student(s) and staff involved; relevant student needs, including any identified SEND; the time, date, location and duration of the intervention; a brief account of the incident; de-escalation strategies used; the type and degree of force applied; any injuries sustained; the reason the intervention was judged necessary; and any post-incident support, including medical treatment. Staff may also record student or witness accounts, how and when parents were informed, and follow-up actions.

Informing parents. Each parent of the student is given written information about the incident as soon as is practicable, ideally the same day, by email. This includes the time, date, location and duration of the intervention, why it was considered necessary, the type and degree of force used, and any injuries sustained. Parents are offered a follow-up discussion, and behaviour support plans are updated where needed.

Where informing a parent could cause harm. If informing a parent is judged likely to result in significant harm to the student, the member of staff must not inform that parent and must speak to the DSL or a deputy immediately. If there is no parent who could be informed without that being likely to result in significant harm to the student, the information is provided to the local authority in whose area the student ordinarily lives. The decision and the reasons for it are recorded on MyConcern, and the DSL considers whether a safeguarding referral is required.

Oversight. Records are reviewed termly and included in reports to the Governors' Safeguarding sub-committee. Because such incidents are expected to be rare, any pattern in the records, whether by student, staff member or setting, is examined and acted on.

8. Allegations against Staff Members, Volunteers or Governors

This section of the policy follows Part 4 of KCSIE and also guidance from Ealing Social Services.

St Benedict's promotes an open and transparent culture in which all concerns about adults are shared responsibly with the right people and recorded to ensure that they are dealt with promptly and appropriately. We also seek to create an environment where staff are confident to self-refer if, for example, they feel that they might have been misinterpreted or on reflection they believe they have fallen below the standards of our code of conduct.

If staff members have concerns about another staff member, volunteer, supply staff, trainee teacher, or contractor who might pose a risk of harm to a child/children or may have harmed a child/children they should refer these to the Head without delay. This same duty applies to an allegation made against a governor. Where there are concerns about the Head, this should be referred to the Chair of Governors. It should be ensured that any reporting of any allegations against the Head to the Chair of Governors is made without informing the Head. Staff may look to discuss any of these concerns with the DSL and make any referral through them.

If an adult makes an allegation that they were abused as a child, they will be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO. The LADO will coordinate with local authority children's social care and the police in accordance with local procedures. Abuse can be reported no matter how long ago it happened.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases will not meet the criteria of a member of staff having harmed or risking harm to a child or may do so without warranting either police investigation or enquiries by local authority Social Services. The Head or DSL will always discuss the issue with the LADO within 24 hours (or ECIRS if they are not available) before taking a decision on this. In cases where external agencies are not required, St Benedict's will act to resolve the case as speedily as possible while also being fair and consistent. It is imperative that the welfare of the child is looked after. The DSL is responsible for ensuring the child is not at risk, and at the same time the person subject to the allegation should also be supported. Where the school identifies that a child has been harmed, there may be an immediate risk of harm to a child, or the situation is an emergency, local authority Children's Social Care and, as appropriate, the police should be contacted immediately.

8.1 Dealing with allegations that may meet the harm threshold

Allegations that meet the harm threshold occur if it is alleged that anyone working at St Benedict's, including supply teachers, trainee teachers, volunteers and contractors, has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child; 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. This includes behaviour that may have happened outside school or college, known as *transferable risk*

The school will not undertake its own investigations of allegations without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. However, the Head can arrange for basic enquiries to establish facts before contacting the LADO while being careful not to jeopardise any possible police investigation, such as: Was the individual in the school at the time of the allegations? Did the individual come into contact with the child? Are there any witnesses or CCTV? The school will ensure that these basic enquiries are consistent with local LADO procedures and that it understands what initial information the LADO will require. Where appropriate, the LADO or another officer appointed by the local authority will deal with the management and oversight of an allegation against a member of staff (see Flowchart 2).

In the first instance the DSL, the Head or, where the Head is the subject of an allegation, the Chair of Governors should discuss the allegation immediately with the LADO and a case manager will be designated. This is to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the LADO in order to help determine whether police involvement is necessary.

In an allegations management meeting St Benedict's will share all relevant information with the other agencies which are also expected to do the same. St Benedict's will ask the police and/or social services to obtain consent from individuals involved to share their statements and evidence for use for the school's own disciplinary process.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the case manager and the designated officer(s), and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the designated officer(s) what action should follow both in respect of the individual and those who made the initial allegation.

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s) and/or social services and the police, if appropriate. It is extremely important that the case manager provides them with as much information as possible at that time. Where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not inform the accused until those agencies have been consulted and have agreed what information can be disclosed to the accused.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance in *Working Together to Safeguard Children*. If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the police or LADO should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. 'Reasonable' means using no more force than is necessary for the least amount of time, depending on the circumstances. The school will have regard to the Department for Education guidance [Restrictive interventions, including use of reasonable force, in schools](#). When considering the use of reasonable force involving children with SEND, mental health problems or medical conditions, the school will recognise their additional vulnerability and consider its duties under the Equality Act 2010, including reasonable adjustments.

If the case manager has concern about the welfare of other children in the community or the member of staff's family, they should be discussed with the DSL and a risk assessment made and potentially a referral to social services.

Where it is clear that an investigation by external agencies is unnecessary, the LADO should discuss the next steps with the case manager. In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in the future.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the LADO should discuss with the case manager how, and by whom, the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff. However, in other circumstances, according to the nature or complexity of the allegation, the allegation will require an independent investigator. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process with a fortnightly or monthly review depending on the complexity of the case. The first review will, if possible, take place four weeks after the initial assessment and dates for subsequent

reviews will be set then. The LADO will provide guidance and advice while the investigation is carried out by either school, social services, the police or a combination.

If there is/has been a criminal investigation or prosecution, the police have a duty to inform St Benedict's when the investigation/trial is complete or the investigation has been closed without charge or it has been decided not to prosecute. The case manager will then discuss the case with the LADO and consideration of next steps will take into account the result of the investigation and in particular the different standards of proof required by disciplinary and criminal proceedings.

Suspension

Suspension should not be an automatic response when an allegation is reported, and all options to avoid suspension should be considered before taking that step. The case manager must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. Alternatives may include redeployment, ensuring another adult is present when the individual has contact with children, removing unsupervised access to children or temporarily redeploying the individual to another role or location. It should only be considered in cases where there is cause to suspect a child, or other children are at risk of harm or if the case is so serious that it could be grounds for dismissal. If in doubt, advice on this should be taken from the LADO and the school's HR/personnel adviser, as appropriate. Social services or the police cannot require that a member of staff be suspended or a volunteer removed, although their views should be given appropriate weight. Police involvement does not make it mandatory to suspend a member of staff.

If suspension is considered necessary, the case manager will record the rationale and justification for this and explain what alternatives were considered and why rejected. Often an inquiry can be resolved quickly without suspension and a decision will then be made about whether the individual will continue to work at St Benedict's. When a member of staff has been suspended, the LADO and case manager should consider how similar investigations could be carried out without a suspension.

Supply teachers, trainee teachers and all contracted staff

If there is an allegation against a supply teacher, trainee teacher or contracted member of staff working at St Benedict's then all of the procedures above would be followed. Where the individual is provided by an employment agency or other business, St Benedict's shares safeguarding responsibilities with that organisation. The school remains responsible for gathering the facts and managing the safeguarding process, working closely with the agency or business, which will usually lead on any disciplinary action.

In relation to a supply teacher, the governors, via the Head, will discuss with the supply agency, and where relevant any other agencies through which the teacher is working, whether it is appropriate to suspend or redeploy the teacher while the investigation is carried out.

It is expected that any supply agency would be fully involved and co-operative in any safeguarding investigation like this. Agencies should cooperate fully with enquiries from the LADO, police and/or local authority children's social care.

As with one of our full-time members of staff, the school would take the lead in handling the safeguarding allegation and gathering the relevant facts, and the supply teacher should be advised to contact their trade union representative if they have one or a colleague for support. It is important that the agency contributes to information sharing so that any previous concerns or allegations known to the agency are taken into account and the agency's human resource manager or equivalent will be invited to any allegations management meetings arranged by the LADO or other relevant meetings.

St Benedict's will not stop using a supply teacher or contracted member of staff due to safeguarding concerns without finding out the facts and liaising with the LADO.

More generally, when using an agency, St Benedict's will inform the agency of our processes for managing allegations and keep them up to date with information about our policies. The policies of the agency will be taken into account, as will their duty to refer to the DBS as personnel suppliers. The agency's HR manager will be invited to meetings about cases involving their staff.

Where a concern or allegation relates to a trainee teacher placed at St Benedict's, the same expectations and procedures will apply. The relevant teacher training provider will be informed and involved as appropriate and is expected to follow the same procedures as those applying to supply agencies.

Support for those involved

St Benedict's has a duty of care to employees and so staff will be informed of concerns or allegations as soon as possible and have the likely course of action explained to them unless the police or children's social care services object. They should be advised to contact their trade union representative or colleagues for support and should also be given access to counselling. If suspended, the member of staff will receive written confirmation within one working day with an appropriate level of detail about the reasoning. A named representative will keep the member of staff informed of the progress of the case and consider what support is appropriate, and the member of staff should also be kept informed of other work-related issues. Social contact with colleagues should be allowed unless this would be prejudicial to the enquiry. The allegation will be dealt with as quickly as possible in a fair and consistent way that provides effective protection for the child but also supports the member of staff who is the subject of the allegation to help minimise stress.

Parents/carers of the child or children involved should be told of the allegation as soon as possible. However, where a strategy discussion is required or external agencies need to be involved, the case manager should not do so until they have been consulted and agreed what information can be disclosed. Parents/carers should be kept informed of the progress of the case only in relation to their child; information about the member of staff should not be shared, and parents/carers should be made aware of the requirement to maintain confidentiality about any allegations made against teachers while investigations are ongoing. If St Benedict's needs to make parents aware of an allegation it will be made clear to parents and others that there are restrictions on publishing information.

When an allegation is made, the school should maintain confidentiality while it is being investigated. Reporting restrictions under the Education Act 2011 apply until either the accused is charged with an offence or the Secretary of State or the DfE/TRA or, where applicable, the General Teaching Council for Wales publishes information about an investigation or decision on a disciplinary case. The case manager will take advice from the DSL / police/ social services about who needs to know and what information can be shared in the case; how the school manages leaks/gossip; what information can be given to reduce speculation; how to manage the press. Reporting restrictions do not apply if the individual subject to allegations goes public themselves or gives written consent for another to do so.

Where it is decided that a person who has been suspended can return to work, school will provide help and support, particularly with regard to their contact with the child who made the allegations. Depending on the circumstances, a phased return and/or provision of a mentor may be appropriate.

Making decisions on allegations

The school will give due weight to the views of the LADO and to this policy when making a decision about suspension. Advice about whether an allegation against a teacher is sufficiently serious to refer to the Teaching Regulation Agency can be found in [Teacher misconduct: the prohibition of teachers](#).

The following definitions should 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 **or cause harm to the person subject of the allegation.**

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.

St Benedict's has a legal duty to report to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the harm test is satisfied in respect of that individual
- Where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence
- If that individual has been removed from working (paid or unpaid) in regulated activity (even if deployed to another area of work not regulated or if suspended), or would have been removed had they not left

A compromise/settlement agreement will not be used where there is an allegation that an individual poses a risk to children. Where the relevant statutory criteria are met, the school will make a referral to the DBS and, in the case of teaching staff, will consider whether a referral to the Teaching Regulation Agency is appropriate. A settlement agreement must never prevent the school from fulfilling these duties. Any such incidents will be followed by a review of the safeguarding procedures within the school done together with the LADO, with a report being presented to the governors without delay.

School will also not stop their investigation if the person leaves or resigns as it is important that allegations are investigated thoroughly in every case. The accused will have full opportunity to answer allegations, but the process of investigating the allegation will continue even if the accused does not cooperate. If they have left before the process is complete, they should be notified of the conclusion of the investigation and sanctions that result from it.

It is important that reports to the DBS include as much evidence about the circumstances of the case as possible. Failure to make a report where the legal duty to refer applies constitutes an offence. 'Compromise/settlement agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation. The governors have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources. The school will confirm to inspectors all instances of action in relation to safeguarding concerns and if the allegation is substantiated the outcome will be made clear when providing references as long as the information is factual and does not include opinions.

For all allegations other than those found to be malicious or false, the following information should be kept on the file of the person accused so that reference checks can be accurate and provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- A note of any action taken and decisions reached and the outcome, including whether the allegation was substantiated, unfounded or unsubstantiated
- A copy of the allegation provided to the person concerned where agreed by social services and the police
- A declaration on whether the information will be referred to in any future reference

All other records of allegations, other than those found to be malicious or false, should be retained at least until the accused has reached pensionable age or for 10 years from the date of the allegation, if that is longer. Further guidance on employment records can be found from the Information Commissioner.

If an allegation against a member of staff is found to have been malicious or false, it will be removed from personnel records unless the individual gives consent for the information to be retained. If an allegation is false, unfounded, unsubstantiated or malicious, it will not be referred to in any employment reference. Repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in a reference. Substantiated safeguarding allegations which meet the harm threshold should be included in references, provided the information is factual and does not include opinions.

For all other allegations, a clear comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, will be kept on a person's confidential personnel file, and a copy provided to the person concerned. In such cases the LADO and case manager will consider if the person who has made the allegation needs support and may have been abused at another time. With malicious allegations the school will consider whether disciplinary action is appropriate against the person making the allegation.

Whatever the outcome of a case and how serious it has been, the case manager will consider the case and determine whether any lessons can be learned or improvements made in the light of this. Where an allegation is substantiated, the LADO should review the circumstances with the case manager, including any decision to suspend, the duration of suspension and whether suspension was justified.

8.2 Concerns that do not meet the harm threshold (low-level concerns)

A low-level concern is still significant as an issue that is inconsistent with the staff code of conduct but is not enough to meet the harm thresholds as set out in section 8.1 and so would not normally be considered serious enough to refer to the LADO. A low-level concern can be any concern, no matter how small, including no more than a sense of unease or a 'nagging doubt'. Examples of such behaviour (and this can be behaviour both in and outside school) are: being over friendly, having favourites, taking photographs of children on a personal mobile phone contrary to school policy, engaging with children one-to-one in a secluded area or behind a closed door, humiliating a pupil. Such concerns can arise from disclosures from children, parents, or other carers or as a result of vetting checks. More detailed guidance on low-level concerns can be found [here](#). Where there is uncertainty about the level of concern raised, the LADO will be consulted.

St Benedict's has a staff code of conduct which makes clear the expectations of staff, what constitutes a low-level concern and the importance of openness and transparency when dealing with these issues. It also makes clear that staff should feel empowered to share low-level safeguarding concerns with the Head, that unprofessional behaviour will be addressed (including support to help correct it) and that there will be a proportionate response to concerns when raised. The governors ensure that this is implemented effectively through regular training in both safeguarding and the code of conduct.

Any such concerns about any member of staff or other adult working in or on behalf of the school, including supply staff, trainee teachers, volunteers and contractors, should be reported in the same way as more serious concerns that do meet the harm threshold to either the Head of Junior or Senior School or the Chair of Governors. Low-level concerns about supply staff and contractors will also be notified to their employers so that any potential patterns of inappropriate behaviour can be identified. If a concern is raised by a third party, the Head or a nominated deputy will collect evidence on the concern by talking directly to the person who first raised the concern, unless it was raised anonymously, the individual involved, and any witnesses. This will help to categorise the type of behaviour and determine next steps, all of which need to be recorded along with the action taken and rationale for that action. These concerns are shared responsibly and dealt with appropriately as with any other concern.

All low-level concerns are recorded in writing with details of the concern, the context of the case and the action taken, along with the name of the individual sharing the concern unless they wish to be anonymous, in which case their anonymity will be respected as far as reasonably possible. These records are kept securely and confidentially with the HR department and in accordance with data protection laws. There is review of concerns so that possible areas for improvement in the school's safeguarding system and wider culture can be addressed and so that potential patterns of concerning behaviour can be identified. If a pattern is noted the school will decide on an

appropriate course of action through its disciplinary procedures or, where the pattern means that the harm threshold is met, refer the matter to the LADO. Consideration will also be given to whether wider cultural issues within the school enabled the behaviour to occur and whether policies should be revised or additional training provided. Information on low-level concerns will be retained by the school at least until the individual leaves their employment.

Low-level concerns are not included in references unless they would normally be included, for instance misconduct or poor performance. A low-level concern which relates exclusively to safeguarding, and not to misconduct or poor performance, should not be referred to in a reference.

9. Child-on-Child Abuse (including harassment and violence)

The school recognises that children are capable of abusing other children, known as child-on-child abuse. This can either be between two children of any sex or through a group of children abusing a child or another group of children. It can happen both in school and outside school and can also happen online. Any incidents of alleged or suspected abuse by children or young people will be taken seriously and reported to the safeguarding leads immediately whether these concerns are thought to have taken place on or off-site. All staff should maintain an attitude of 'it could happen here', particularly when considering child-on-child abuse.

All staff understand that, in whatever form it takes, it is never acceptable, will never be tolerated, and is not an inevitable part of growing up or something which can be dismissed as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up'. Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. All staff are trained in our procedures with regard to child-on-child abuse and understand that they have an important role to play in preventing or responding to it. Downplaying these behaviours can lead to a culture of poor behaviour and an unsafe environment in the school and, in the worst cases, normalises abuse leading to children accepting it as normal and not coming forward to report it. In particular it can allow or even encourage misogynistic ideas or behaviour in school. Staff should recognise the escalatory nature of misogyny and the importance of identifying and addressing such behaviour early.

Staff know that child-on-child abuse might take various forms so that they can identify and respond to it. In addition, it is important that all our staff understand that child-on-child abuse is preventable, and that timely, evidence-based support is key in preventing children from committing abuse or violence. Staff should also understand harmful sexual behaviour (HSB) as behaviour which can occur online, face-to-face, or both, and which should always be considered within a child protection context. Sexual behaviour exists on a continuum from normal and developmentally expected behaviour through to inappropriate, problematic, abusive or violent behaviour. HSB can in some cases escalate into sexual harassment or sexual violence, making early identification and intervention particularly important.

Examples of child-on-child abuse are (the following list is not exhaustive):

- Bullying, including cyber-bullying and prejudice-based and discriminatory bullying such as racial, homophobic, gender or culture-related bullying or abuse
- Discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens or encourages physical abuse)
- Sexual harassment and sexual violence, including abuse in intimate personal relationships between children and behaviour occurring both online and offline. Sexual harassment may include sexual comments, sexual 'jokes' or taunting, unwanted sexualised behaviour, deliberately brushing against another child, interfering with their clothing, displaying sexual images, unwanted sexual messages or sexualised online bullying
- Sexual violence, including rape, assault by penetration and sexual assault. Sexual assault can encompass a wide range of behaviour and may include, for example, kissing someone without consent or touching another person's bottom, breasts or genitalia without consent
- Causing someone to engage in sexual activity without consent, e.g. forcing them to strip, touch themselves sexually or engage in sexual activity with a third party
- Via the use of ICT e.g. consensual and non-consensual making or sharing of nudes and semi-nude images and/or videos, including images which have been digitally altered or wholly generated using artificial intelligence, or other unwanted explicit content. Staff should be particularly mindful of the potential for the misuse of information technology for bullying and abusive purposes. All incidents involving the making or sharing of nude or semi-nude images require a safeguarding response, whether consensual or non-consensual. The response should be proportionate and take account of the children's age, development and circumstances and any elements of coercion, exploitation or vulnerability
- Coercing another child into sharing images of themselves or performing sexual acts online with which they are not comfortable
- Grooming by children as part of child sexual exploitation

- Abuse linked to gang-related activity
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. This is a criminal offence under the Voyeurism (Offences) Act 2019
- Initiation/hazing type violence/ritual, which could include harassment, abuse or humiliation as an initiation process and may include an online element
- Serious physical assault and harm, or the threat of harm with a weapon

We know that child-on-child abuse might manifest differently for boys and girls, and staff should avoid assumptions about how abuse will present. KCSIE notes that girls are more likely to be victims of sexual harassment and sexual violence and boys more likely to perpetrate it, although any child can be a victim or perpetrator. Such abuse may also be indicative of a previous or ongoing abusive experience for a perpetrator and/or victim.

Research indicates that children with SEN, additional or complex needs are particularly vulnerable. Children with disabilities are significantly more likely to experience abuse than their peers. Staff should also recognise that disability, sex, ethnicity, sexual orientation and other vulnerabilities may create additional barriers to children disclosing abuse. All staff should be mindful of the added vulnerability of children and young people who have been the victims of violent crime, including the risk that they may respond to this by abusing younger or weaker children.

The alleged perpetrator may have considerable unmet needs, as well as posing a significant risk of harm to other children. Evidence suggests that children who display HSB have often experienced their own abuse or trauma. Consequently, any plan to reduce and/or manage risk posed by a child who is alleged to have abused another must also address their needs and responses should be considered accordingly. Taking disciplinary action and providing appropriate safeguarding support are not mutually exclusive and can occur at the same time.

As a school, we recognise that it is not enough 'just' to respond to incidents should they arise. We understand that even if there are no reports in our school it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding child-on-child abuse, they should speak to their Designated Safeguarding Lead (or deputy). We also look to be alert when children might be at highest risk around the school day, for example immediately after school. In addition, we try and minimise the possibility of child-on-child abuse by:

- Creating and maintaining an environment which is safe, caring, respectful and stimulating, and which seeks to promote the social, physical, and moral development of our pupils
- Actively discouraging and challenging all unacceptable behaviour, including all forms of bullying and abuse. We will also challenge the attitudes and behaviours which underpin it, including sexism and misogyny
- Striking an appropriate balance between pupils' right to privacy and the need for proportionate supervision to keep them safe in and around school
- Having in place clear strategies for promoting positive behaviour, including a system of rewards and sanctions that is clear to staff, pupils, and parents
- Maximising opportunities within the curriculum, via PSHE, assemblies and focused weeks to deliver key keeping safe and associated behavioural, spiritual, moral, social, and cultural messages - including the use of external resources and the expertise of external speakers and groups. Preventative education will include age-appropriate teaching about healthy and respectful relationships, consent, sexual harassment and sexual violence and the responsible use of technology
- Ensuring that all adults associated with our school understand their role and responsibilities as role models
- Ensuring that staff and any volunteers are trained to look for and respond appropriately to any potential indicators of child-on-child abuse, including signs of HSB, sexual harassment and sexual violence
- Seeking appropriate and timely advice where uncertainty exists and/or concerns arise
- Ensuring that children and parents know how to raise any worries or concerns with adults/staff in school and by signposting them to appropriate sources of advice and support outside school. The school will

ensure that reporting systems are clear, well-promoted and accessible so that children can confidently report abuse knowing that their concerns will be taken seriously

Responding to Allegations of Child-on-Child Abuse

The school recognises the need for sensitivity and proportionality when dealing with these difficult issues. Reports are likely to be complex and may require swift and difficult professional decisions. The DSL or a deputy will normally lead the school's response, using professional judgement and consulting external agencies where appropriate. Decisions will be made on a case-by-case basis.

The way in which staff respond to an initial disclosure is particularly important. Children may not disclose abuse directly and staff must act on signs or concerns rather than waiting for a child explicitly to tell them that something has happened. Victims will be 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. They should never be made to feel ashamed or that they are causing a problem by reporting abuse. Abuse occurring online or outside school will be treated with equal seriousness.

When receiving a report, staff should:

- where possible have two members of staff present, preferably including the DSL or a deputy
- listen carefully, use the child's language, avoid judgement and ask only open-ended questions necessary to establish what has happened
- never promise confidentiality and explain clearly who will need to be told and what will happen next
- recognise that an initial disclosure may not represent the full extent of the abuse and that trauma may affect a child's memory of events
- make a written record of what the child says without interpretation or personal opinion
- inform the DSL or a deputy as soon as practically possible if they were not present when the report was made

Where a report includes nude or semi-nude imagery, staff must not ordinarily view, copy or forward the image. Illegal images of children must not be forwarded. The school will follow the relevant UKCIS guidance and may, where appropriate, preserve a device for examination by the police rather than accessing the image itself.

The following general rules will apply to the management of reports:

- The safeguarding leads will seek appropriate and timely advice wherever necessary and contact ECIRS where there are concerns, or the equivalent if the child lives in a different local authority. The safety and best interests of victim(s) will be the paramount consideration at all times. The safeguarding leads will also consider the possibility and take account of any wider and/or ongoing risk(s) to others
- Following a report of sexual violence, the DSL or deputy will carry out an immediate risk and needs assessment. Following a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The assessment will consider the victim's safety and support needs, the alleged perpetrator, possible other victims, the wider school community, and the location and timing of the incident. It will be recorded, regularly reviewed and used to inform ongoing safeguarding decisions
- The needs of the victim and the needs of the alleged perpetrator will be considered separately. The victim's wishes about how they want to proceed will be taken into account and they will be given as much control as is reasonably possible, balanced against the school's duty to protect them and other children
- In addition to safeguarding the identified victim, the school will consider (i) whether the alleged perpetrator seems to pose a risk to any other children; and (ii) how best to manage that risk
- Where a child has displayed abusive or harmful behaviour, the school will address that behaviour while also considering what safeguarding support the child may require
- The alleged perpetrator may have considerable unmet needs as well as posing a significant risk of harm to other children. Any response will therefore consider their age and developmental stage, the nature and frequency of the alleged behaviour, any unmet needs or underlying trauma and the support needed to prevent further harmful behaviour

- Where necessary, the school will participate fully in a coordinated approach by child welfare/protection, youth offending, education, health and other relevant agencies
- All concerns, discussions, decisions and the rationale for those decisions will be recorded clearly in writing

Depending upon the circumstances, the DSL will consider four broad routes for responding to a report: managing the matter internally through the behaviour and pastoral systems; obtaining support through universal services or community-based Early Help; making a referral for Family Help and/or to local authority children's social care; or reporting the matter to the police. These options are not necessarily mutually exclusive, and the appropriate response will depend upon the circumstances of the individual case.

Where a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to local authority children's social care. The school will not wait for the outcome, or even the commencement, of a social care or police investigation before taking proportionate steps to protect the victim and other children.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that it should be passed to the police. This remains the starting principle even where the alleged perpetrator is under the age of criminal responsibility, in which case the police will take a welfare rather than a criminal justice approach.

Where rape or assault by penetration is reported, the alleged perpetrator should be removed from any classes shared with the victim while the school establishes the facts and liaises with children's social care and the police. The school will also consider how to maintain reasonable physical separation between the children elsewhere on the premises, during before- and after-school activities and, where relevant, on transport to and from school. This is a safeguarding measure and must not be regarded as a judgement about the guilt of the alleged perpetrator. For other reports of sexual harassment or sexual violence, shared classes, proximity and other contact will be considered immediately on a case-by-case basis.

Parents or carers of the children involved will generally be informed, although this will not be done where there is reason to believe that informing a parent or carer would place a child at additional risk. Where children's social care or the police are involved, the school will liaise with them about what information can be shared and when.

Only those staff and agencies who need to know in order to safeguard the children or progress an investigation will be involved. Reasonable steps will be taken to protect the anonymity of all children involved and particular consideration will be given to the potential for social media, messaging and online discussion to spread rumours, compromise anonymity or result in further bullying or harassment.

Support for the victim will be reviewed regularly and may need to continue for an extended period. Wherever possible the victim should be able to maintain their normal routine and should not be isolated from supportive friends or unnecessarily removed from lessons or activities for the convenience of managing the situation. Where ongoing support is required, the child should, wherever reasonably possible, be offered a trusted adult of their choice with whom they can discuss their needs.

The school will also take reasonable steps to protect the victim, alleged perpetrator and witnesses from subsequent bullying or harassment, including online. The potential risks arising during break and lunchtimes, before and after school, on school transport and through social media will form part of ongoing risk assessment.

Where a police investigation or children's social care assessment concludes without further action, or where criminal proceedings result in a not guilty verdict, the school will not assume that the reported incident did not happen or that the child making the report was untruthful. Safeguarding and pastoral support for both the victim and alleged perpetrator will continue for as long as necessary and decisions about contact between them will continue to be made on a case-by-case basis.

The school may take disciplinary action while an investigation by the police or children's social care is ongoing where it is appropriate to do so. The fact that another agency is investigating does not itself prevent the school reaching its own conclusion, on the balance of probabilities, under its behaviour procedures. Before doing so, the

DSL will consider whether school action could prejudice an external investigation and will liaise carefully with the police and/or children's social care where appropriate.

Following any significant incident, and particularly where patterns of behaviour emerge, the school will consider whether there are wider cultural, environmental or systemic issues which need to be addressed through changes to policy, supervision, staff training or the curriculum.

10. Sexual Violence and Sexual Harassment Between Children

This section of the policy follows Part 5 of KCSIE and also Annex A, which has many links to online support and advice. It is also informed by Ofsted's [Review of sexual abuse in schools and colleges](#) (June 2021).

Harmful sexual behaviour (HSB) is a useful umbrella term for the different forms of inappropriate, problematic, abusive and violent sexual behaviour. HSB can occur online, face-to-face or both and should always be considered within a child protection context. Children's sexual behaviour exists on a continuum, ranging from normal and developmentally expected behaviour through to inappropriate, problematic, abusive or violent behaviour. In considering HSB, sexual behaviour where there is a big age difference, typically more than two years, or where one child is pre-pubescent and the other is not, can be considered harmful although it also depends on, e.g., physical size, developmental stage, disability or other differences in power between the children. Understanding HSB is an important part of safeguarding training at St Benedict's and also the PSHE programme. Early intervention in inappropriate behaviour, including misogyny, can help prevent escalation to more serious sexual harassment or sexual violence.

Sexual harassment is 'unwanted conduct of a sexual nature' and can include sexual comments such as sexualised names, comments or stories, sexualised jokes, physical behaviour such as brushing against someone or interfering with their clothes, displaying pictures of a sexual nature, online sexual harassment such as consensual and non-consensual making or sharing of nudes and semi-nude images and/or videos, sharing unwanted explicit content, sexualised online bullying, unwanted sexual comments or messages, sexual exploitation, coercion or threats, and coercing someone to share images of themselves or perform acts online with which they are not comfortable. It can violate a child's dignity, make them feel intimidated or degraded and create a hostile, offensive or sexualised environment.

Sexual violence refers to sexual offences as described under the [Sexual Offences Act 2003](#) including rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent. Specific definitions of types of sexual violence can be found in Part 5 of KCSIE. Sexual assault covers a very wide range of behaviour and may include, for example, a single act of kissing another person without consent or touching their bottom, breasts or genitalia without consent. Sexual harassment and violence exist on a continuum and may overlap.

St Benedict's works closely with the Schools Consent Project to educate all its students about consent, and that consent is the freedom and capacity to choose. Specifically in sexual relations 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. Very importantly:

- A child under the age of 13 can NEVER consent to any sexual activity
- The age of consent in the UK is 16
- Sexual intercourse without consent is rape

It is important to distinguish consensual sexual activity between children of a similar age from behaviour involving a power imbalance, coercion or exploitation. The DSL or a deputy should generally lead the school's response where questions of consent arise and seek expert advice where there is uncertainty.

St Benedict's has a zero-tolerance approach to sexual violence and/or sexual harassment and will always respond appropriately to all reports, including incidents taking place outside school or online. All incidents involving the making or sharing of nude or semi-nude images will receive a safeguarding response, whether the sharing appears consensual or non-consensual. The response will be proportionate and take account of the age, development and circumstances of the children involved and any coercion, exploitation or vulnerability. This includes images which have been digitally altered or wholly generated using artificial intelligence.

Even if an incident does not seem that serious in the first instance, addressing any poor behaviour will help to prevent further, and potentially worse, behaviour in the future. All staff understand that, in whatever form it takes, sexual violence and/or sexual harassment is never acceptable, will never be tolerated, and is not an inevitable part of growing up and is never 'banter', 'just having a laugh' or 'boys being boys'. St Benedict's challenges inappropriate behaviours, in particular potentially criminal behaviour such as grabbing bottoms, breasts or genitalia, pulling down trousers, flicking bras or lifting up skirts, and such actions are sanctioned severely under our discipline policy. Downplaying these behaviours can lead to a culture of poor behaviour and an unsafe environment in the school and in worst cases normalises abuse leading to children accepting it as normal and not coming forward to report it. The school recognises particularly the escalatory nature of misogyny and the value of identifying and addressing it at an early stage.

As with any safeguarding, staff must always take the line that 'it could happen here', KCSIE notes that girls are more likely to be victims of sexual harassment and sexual violence and boys more likely to perpetrate it, while recognising that any child can be a victim or perpetrator. As with any child-on-child abuse, sexual violence and harassment can occur between any two children, or groups of children regardless of age or sex. There is regular staff training on being vigilant for, and responding to, incidents of sexual violence and harassment.

Also, as in other areas of safeguarding, it is important to be aware that SEND students can be especially vulnerable. Children with disabilities are significantly more likely to experience abuse than their peers, and staff should recognise that disability, sex, ethnicity or sexual orientation may create additional barriers to disclosure. This issue is addressed as a whole-school issue as part of our wider safeguarding policy. It forms part of staff training and is dealt with in the school PSHE course for all the students.

Children who are victims of sexual violence and/or harassment will find this stressful and distressing, particularly if the alleged perpetrator(s) attend the same school or college. Even more than with other forms of child-on-child abuse we understand that even if there are no reports in our school it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding child-on-child abuse they should speak to their Designated Safeguarding Lead or a deputy.

All victims are taken seriously, supported to be kept safe, and are offered support both pastorally and also bearing in mind the potential impact on their educational attainment. Staff will look to emphasise to the victim and reassure them that they are being taken seriously, they are being supported and will be kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or harassment and they should certainly not be made to feel ashamed by making a report. It will also be explained that the law is there to protect children and not criminalise, to help avoid creating alarm or distress. This applies regardless of how long it has taken the child to make the report and whether the incident occurred online, offline, at school or elsewhere.

Making/receiving a report

Students are encouraged to report abuse or any other safeguarding concerns to a member of staff that they trust, and this is regularly reinforced in PSHE lessons and form time. Students have the opportunity to raise concerns with their pastoral tutor or their Division Head. In addition, the senior school also uses the Skodel pastoral app. The school aims to maintain clear, well-promoted and accessible reporting systems so that children can confidently report abuse knowing that their concerns will be taken seriously.

It is often not easy for children to tell staff about abuse directly. Often concerns will arise from changing behaviour or appearance and staff might also hear about abuse indirectly from another student or possibly from overhearing conversations about possible concerns. Staff should always look to act if they have any concerns that come to them indirectly like this. Staff must act immediately on concerns about a child's welfare rather than wait for the child to make a direct disclosure. In particular, they should bear in mind that some children may face additional barriers to reporting because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

We will aim where possible to have two members of staff present in the case of a student making a disclosure, preferably including the DSL or a deputy. As ever with safeguarding they will not promise confidentiality although

the report will also only be shared with the necessary people. Also, as with other safeguarding disclosures staff should look to listen carefully, reflect the child's language in what they say, be non-judgmental and not ask leading questions, although staff can ask children if they have been harmed and what the nature of that harm was. Open-ended questions such as where, when and what may be used where necessary. An objective written record should be made either during the meeting or straight after, the preferred option so that the child can be given full attention. The record should contain what the child has actually said without interpretation or personal opinion. Next steps will be explained to the victim including who the report will be passed to.

It is extremely important that all staff respond properly to a report from a child because this response will either encourage or undermine the confidence of that child or other students to potentially come forward to report sexual violence and/or harassment in future. A disclosure of sexual violence or harassment will be treated like any other safeguarding disclosure, including abuse that occurs online or outside school. Staff should recognise the significance of having been chosen by a child as somebody they trust and respond with empathy and respect.

Staff should bear in mind that this might be only the first *reported* incident rather than just a single incident. An initial disclosure may not reveal the full extent of the abuse. Trauma can affect memory so children might not be able to recall some details.

One important point to emphasise is that in cases where illegal images of a child have been taken and/or circulated the teacher should be careful not to view or forward these images. Staff should follow the relevant UKCIS guidance. Where appropriate a device may be confiscated in order to preserve evidence and passed to the police for inspection. If viewing an image is unavoidable, the procedures set out in the UKCIS guidance must be followed.

Responding to a report

The school will offer support such as counselling to the victim. If an allegation does go through the criminal justice system, there will be anonymity offered in the legal system, and St Benedict's will do all it can to reasonably protect the anonymity of any children involved in a report of sexual violence or harassment. KCSIE and the CPS provide further guidance on supporting child victims and witnesses through the criminal justice process. It is understood that social media may make this more difficult and the school will be as watchful as it can be for this possibility. As ever with safeguarding, only appropriate and relevant staff will be informed of the report. The school will take reasonable steps to protect the anonymity of all children involved and consider carefully which members of staff genuinely need to know.

When there has been a report of sexual violence the DSL will make an immediate risk and needs assessment, and in cases of harassment the need for a risk assessment will be considered on a case-by-case basis. The assessment will consider the victim's needs, whether there have been other victims, the alleged perpetrator and other children in their peer group, the wider school community including staff and students, any appropriate actions necessary to protect them, and the location and timing of the incident and whether changes are needed to make that area safer. Risk assessments will be recorded and kept under review and measures will be put in place to protect all concerned and keep them safe. Professional assessments by social workers or specialist sexual violence services will be sought where necessary and used to inform the school's own assessment rather than replace it.

Reports of sexual violence and sexual harassment are often particularly complex and difficult and so the DSL will lead the response and use professional judgement to decide whether advice or involvement is required from local authority children's social care, specialist services and/or the police. Where there has been a report of rape, assault by penetration or sexual assault, the starting point will be that the matter should be passed to the police, and more widely the school will contribute to any multi-agency requirements as necessary.

The DSL will normally be the person to decide on the school's response to a report of sexual violence or harassment. In all cases, the initial report will be carefully evaluated on a case-by-case basis. The school's approach will consider:

- The wishes of the victim on how to proceed. Victims should be given as much control as reasonably possible over how the investigation will proceed and what support is offered to them although this will be balanced with our responsibilities to protect other children
- The nature of the alleged incident, including whether a crime may have been committed and whether the behaviour may constitute HSB
- The ages and developmental stages of the children involved. In particular, if there are any power imbalances, for instance if an older child is the perpetrator, or differences in maturity, social status, disability or learning difficulty
- If this is a one-off incident or part of a pattern, including the possibility of other forms of abuse
- That sexual violence and harassment can take place within intimate personal relationships between children
- Any intrafamilial harm and whether siblings require support
- Any ongoing risks to the children involved including the wider protection of all the children in St Benedict's and any potential risk to staff or adult students
- Wider environmental factors where incidents or behaviour are associated with issues outside school and environmental factors are present that are a threat to one or more of the children's health or welfare. This includes potential links with child sexual exploitation or child criminal exploitation. This contextual understanding can be very important if a safeguarding referral is made

Immediate steps will be taken to support and protect the victim, alleged perpetrator and any other children affected by the report.

Acting on a report

Given the distress caused by potential close proximity of a victim and an alleged perpetrator at school, the alleged perpetrator in a very serious case such as rape or assault by penetration will be removed immediately from any classes they share with the victim while the school establishes the facts and liaises with local authority children's social care and the police. Risk assessments should be updated as appropriate. Separation is done to support both children and is not a judgement on the guilt of the alleged perpetrator. More widely outside the classroom, the DSL will look to see how the children involved can be kept a reasonable distance apart across the school premises, including during before- and after-school activities and, where relevant, on transport to and from school. In other cases of sexual violence and/or harassment the DSL will make a judgement on whether, and how much, separation is needed. Questions about shared classes and proximity will be considered immediately in every case.

The DSL should carefully consider when to inform the alleged perpetrator(s) of the report. Where social services and/or the police are informed this would only happen after discussion with these other agencies. However, involvement of external agencies must not delay immediate safeguarding action where this is required to protect children.

The victim may ask St Benedict's not to tell anyone about an incident but as with other safeguarding incidents if a child has been harmed, is at risk of harm or is in immediate danger a referral should be made to local authority children's social care, and if rape, assault by penetration or sexual assault is reported, the starting point is that the report should be passed to the police. This remains the starting principle even where the alleged perpetrator is under the age of ten, although the police will take a welfare rather than criminal justice approach in such circumstances. Parents/carers will normally be informed unless this would put the victim at additional risk. The DSL will balance the victim's wishes against the duty to protect them and other children and will generally look to take advice with external agencies.

If information needs to be shared against a victim's wishes, this will be handled sensitively, the reasons will be explained to the child and appropriate specialist support will be offered.

Consideration will be given to supporting other students who have witnessed or been affected by an incident. This includes working to ensure students are not taking 'sides' or bullying/harassing any of those involved, either physically or online. This includes consideration of how students get to and from school. Social media and

messaging will be monitored as far as reasonably possible because these may facilitate harassment of the victim, alleged perpetrator or witnesses and may compromise their anonymity.

There are four likely scenarios to consider when managing reports of sexual violence and/or sexual harassment:

1) Manage internally. This might be the case with, for instance, a one-off incident of HSB or sexual harassment where statutory intervention is not required. It should still be made clear though that there is zero tolerance of this sort of behaviour and all the concerns, discussions, decisions and the rationale for them should be recorded as usual.

2) Universal services and community-based Early Help. While it might be that no referral is needed in a case like this, it may be decided that support is needed to address concerns and to prevent an escalation of unacceptable behaviour, either from within school or with universal services or community-based Early Help available locally. It could be that both are used as the school can manage the situation internally and also seek external Early Help. Again, all the details of the case will be recorded and zero tolerance will be stressed.

3) Referrals to Family Help, including targeted Early Help and local authority children's social care. Some children and families may need more targeted support than can be provided through universal or community-based Early Help. Targeted Family Help may therefore be appropriate. Where a child has been harmed, is at risk of harm or is in immediate danger, a referral will be made to ECIRS. This referral will be made with the same principles as any safeguarding referral, with particular significance given to the need to make sure that the victim, and any other affected children including the alleged perpetrator, are protected immediately without waiting for an investigation to start. Social services may feel that intervention is not appropriate, but a new referral should be made if it is felt that the child remains in danger or at risk of harm or circumstances change. If statutory intervention is not considered appropriate, the DSL will consider other support including Family Help, specialist support and pastoral support. Again, all the details of the case will be recorded and zero tolerance will be stressed.

4) Report to the police. These reports will generally be made in parallel with an ECIRS referral, and where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed to the police. More advice can be found in the national [When to call the police](#) guidance. Next steps will be made in consultation with the police including what information can be disclosed, how the victim and their anonymity will be protected and when to inform parents. The DSL will make sure that actions taken by St Benedict's do not jeopardise the police investigation. If a student is given bail or is released under investigation, St Benedict's will carry out a risk assessment for that student in liaison with the police. The absence of bail conditions does not remove the school's responsibility to consider what additional measures may be needed to manage risk. Again, all the details of the case will be recorded and zero tolerance will be stressed.

In the case of a criminal investigation, St Benedict's will work closely with the police and other agencies to ensure the school's actions do not jeopardise the police investigation while it is ongoing. KCSIE makes clear that 'Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing', but this will always be considered on a case-by-case basis. The fact that another agency is investigating does not itself prevent the school reaching its own conclusion, on the balance of probabilities, about what happened and taking disciplinary action. The DSL will consider carefully whether doing so might prejudice an external investigation and will liaise with the police and/or children's social care where appropriate.

If a criminal investigation leads to a conviction or caution, St Benedict's will then take disciplinary action according to the school discipline policy. In most situations like this, rape or assault by penetration would be a serious breach of discipline and lead to the view that allowing the perpetrator to remain at St Benedict's would seriously harm the education and welfare of the victim. Where a conviction or caution relates to sexual assault, the school will consider appropriate sanctions under its behaviour policy, including whether continued attendance at St Benedict's is appropriate. Whether the perpetrator remains in school or not, a risk assessment will be made for all the children involved in consultation with the children, families and external agencies with particular emphasis on avoiding bullying and harassment from other students who may well know about the case.

If there is no further action on the case, school will provide support and also follow its own disciplinary procedures as the burden of proof for a criminal case and a school disciplinary proceeding is very different. The fact that an allegation cannot be substantiated, is withdrawn, results in no further action or leads to a not guilty verdict does not necessarily mean that the incident did not happen or that the victim was untruthful. Appropriate support will continue to be provided to the victim and alleged perpetrator for as long as necessary.

If a report is found to have been unsubstantiated, unfounded, false or malicious the DSL will consider what further steps need to be taken both in supporting the students and also potentially as a disciplinary concern. If a report is shown to have been deliberately false or malicious, disciplinary action may be considered in accordance with the school's behaviour policy. The DSL will record decisions made on MyConcern both to record the events and to explain decision making.

Decisions regarding safeguarding support for the victim should be based on the following principles:

- As above, the needs and wishes of the victim should be paramount within the context of protecting the child. Wherever possible the victim should be able to continue with their normal routine so that St Benedict's remains a safe place for them. A victim will never be made to feel they are the problem for making the report
- Also as above, consider the age and developmental stage of the victim, especially as there will often be a power/age imbalance between the victim and alleged perpetrator
- Support should be on a case-by-case basis so that there is proportionality to the school response as well as effective support for the victim. It is possible that this support could be very long-term depending on the nature of the incident and St Benedict's will seek in particular to ensure that the victim is not isolated from their peer group or bullied or harassed. Any departure from the child's normal timetable should be driven by their needs and wishes rather than by administrative convenience. Where ongoing support is required, the victim should, wherever reasonably possible, be offered a trusted adult of their choice to speak to about their needs
- Needs can be on a range including mental, physical and sexual health or unwanted pregnancy and external support can be found with the NHS Sexual Assault Referral Centre (SARC). KCSIE provides links to SARCs, specialist sexual violence organisations, Children and Young People's Independent Sexual Violence Advisers and other sources of support
- All reasonable steps will be taken to protect a victim from bullying or harassment arising from their report. Protective and supportive measures may need to remain in place for an extended period and will be reviewed regularly

Decisions regarding safeguarding support for the alleged perpetrator and any child displaying HSB should be based on the following principles:

- While needing to safeguard the victim and wider student body, the alleged perpetrator will also need support and they should be provided with education, ongoing safeguarding support and information about any disciplinary sanctions. Support and disciplinary proceedings are not mutually exclusive and may need to happen at the same time
- Consideration of the developmental stage and age of the alleged perpetrator and the proportionality of the response to be decided on a case-by-case basis. The nature and frequency of the allegations, any unmet needs and whether the behaviour may result from the child's own experience of abuse or trauma should also be considered
- Appropriate intervention should seek to stop further harmful behaviour and address underlying causes. In particular, addressing inappropriate behaviour, including sexism and misogyny, may prevent escalation to problematic, abusive or violent behaviour
- School can itself be an important protective factor for children who have displayed HSB. Continued access to education, supported by a comprehensive safeguarding management plan, should therefore be considered before final decisions about the child's placement are made
- 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

If either the victim or alleged perpetrator moves to another educational institution, the DSL or deputy will ensure that relevant safeguarding information, ongoing support needs and, where appropriate, potential risks to children or staff are shared appropriately with the receiving institution alongside the transfer of the child protection file.

All decisions and actions are regularly reviewed and 'lessons learnt' are discussed. If patterns of behaviour across the school are identified, then the pastoral team will look to take appropriate action to remedy this. Consideration will always be given as to whether extra teaching time and/or staff training should be put in place to make sure that the wider culture of the school is such that possibilities of inappropriate behaviour like this are minimised. The school will also consider whether patterns of HSB, sexual harassment or sexual violence indicate wider environmental, cultural or systemic problems requiring changes to policy, processes, supervision or the curriculum. Where appropriate, emerging local trends will be shared with safeguarding partners.

11. Safeguarding Children Away from the School Site (including work experience)

When on school trips, it is important that staff continue to apply all elements of the safeguarding policy and continue to be vigilant for potential safeguarding issues. The Deputy Head Pastoral can be contacted on his school phone or by email if there are any urgent safeguarding issues that need discussion. Pupils should also know who they can contact during a trip, including during any homestay, if an emergency occurs or a situation arises which makes them feel uncomfortable.

Students sometimes stay with a host family when on a trip, often a foreign language exchange or sports tour. Where St Benedict's arranges for a visiting child to stay with a host family in the UK, and the school has the power to terminate the homestay arrangement, the responsible adults providing care and accommodation will be engaging in regulated activity for the period of the stay and St Benedict's would be the regulated activity provider. St Benedict's will therefore obtain an enhanced DBS certificate with children's barred-list information for those adults. In addition, the school will consider whether it is necessary to obtain an enhanced DBS certificate for any other person aged 16 or over living in the household.

Where a child's parents, or the student themselves, make their own private homestay arrangements, St Benedict's will not ordinarily be the regulated activity provider.

It is not possible to obtain DBS criminality information from the DBS for adults who provide homestays for our students abroad. St Benedict's will liaise with partner schools abroad to establish a shared understanding of, and agreement about, the arrangements in place for the visit. Parents will be informed of the agreed arrangements. Pupils will be told clearly whom they should contact if they have concerns during the homestay.

In some circumstances a homestay arrangement in the UK may amount to private fostering. Private fostering occurs where a child under 16, or under 18 if disabled, is cared for and accommodated for 28 days or more by somebody who is not their parent, a person with parental responsibility or a relative. Where St Benedict's is involved, directly or indirectly, in arranging private fostering, the school will notify the relevant local authority in accordance with the Children Act 1989 and associated regulations. Where the school becomes aware of a private fostering arrangement which it did not arrange, it will also notify the local authority.

Where St Benedict's places a pupil with an alternative provision provider, the school continues to be responsible for safeguarding that pupil. An example of this is the timetabled service activities done by the Lower Sixth with different organisations around Ealing. St Benedict's will obtain written confirmation that the appropriate safeguarding checks have been carried out on individuals working at the establishment as would happen at school. The alternative provider will also be expected to confirm that it will inform St Benedict's of any arrangements or changes which may put the pupil at risk, including changes of staff, so that the school can satisfy itself that appropriate safeguarding checks have been carried out.

Where St Benedict's organises a work-experience placement or activity, the school will ensure that the placement provider has appropriate policies and procedures in place to protect children from harm. If a person providing teaching, training, instruction, care or supervision to the child does so frequently, on more than three days in a 30-day period, or overnight, that person will be engaging in regulated activity. A person who is barred from regulated activity must not be permitted to undertake such supervision. Other employees in the workplace who are not involved in teaching, training, instructing, caring for or supervising the child are not in regulated activity merely because the child is present in the workplace.

St Benedict's is not permitted to request that a work-experience provider obtains an enhanced DBS check with children's barred-list information for staff supervising students aged 16 or 17 on work experience. The school and placement provider may, however, consider whether other lawful levels of DBS checking are appropriate for individuals who have contact with children but are not undertaking regulated activity.

St Benedict's does not ordinarily organise work experience, but if this does happen the school will ensure that the placement provider has safeguarding policies and procedures in place.

The nature, frequency and circumstances of the supervision will determine whether the adult supervising the placement is undertaking regulated activity and what safeguarding checks are lawful and appropriate.

In addition, it may be necessary for the organiser of the work experience to request a DBS enhanced check for the child doing work experience if they are 16 or over and working with children. Where a person aged 16 or over undertakes work experience in a specified place, such as a school or sixth-form college, and the placement gives them the opportunity for contact with children, the activity may itself constitute regulated activity. In those circumstances, the placement provider should consider whether an enhanced DBS check should be requested for the student. DBS checks cannot be requested for children under the age of 16.

12. Looked After Children, Children with Social Workers and Young Carers

A child who is looked after by a local authority (referred to as a looked-after child), as defined in section 22 of the Children Act 1989, means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by a local authority. KCSIE notes that the most common reason for children becoming looked after is as a result of abuse and/or neglect. Should the school have on roll a child who is looked after by the local authority, St Benedict's will ensure that our staff have the skills, knowledge and understanding necessary to keep them safe. In particular the DSL will ensure that all agencies work together and prompt action is taken on concerns to safeguard these particularly vulnerable children.

Appropriate staff will have the information they need in relation to a child's looked-after legal status, whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order, and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL will have details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

As an independent school, St Benedict's will ensure that an appropriately trained teacher takes the lead in supporting the educational achievement of looked-after and previously looked-after children. The DSL will work closely with this person where appropriate. All looked-after children will have a Personal Education Plan (PEP) as part of the local authority care plan, and the school will contribute appropriately to its development and review.

Virtual School Heads have statutory responsibilities for looked-after children and responsibilities in relation to previously looked-after children. Their role also includes a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children with a social worker and, since September 2024, a non-statutory responsibility to promote the educational achievement of children in kinship care. The school will work constructively with the relevant Virtual School Head and make use of the advice and information they provide where appropriate.

A child who has been looked after in the past may remain particularly vulnerable. St Benedict's will ensure that staff have the skills, knowledge and understanding necessary to keep previously looked-after children safe and will provide appropriate pastoral and educational support according to the needs of the individual child. As with looked-after children, agencies should work together and take prompt action where necessary to safeguard previously looked-after children.

Where a young person ceases to be looked after and becomes a care leaver, the local authority continues to have responsibilities towards them. This includes keeping in touch, assessing their needs and, where applicable, appointing a Personal Advisor who works with the young person to develop a pathway plan setting out how the local authority will support their participation in education or training. The DSL will therefore have the details of the local authority Personal Advisor appointed to guide and support any care leaver at St Benedict's and will liaise with them as necessary regarding issues of concern affecting that young person.

Children may need a social worker due to safeguarding or welfare needs such as abuse, neglect or complex family circumstances. Children with a social worker can face significant barriers to education as a result of experiences of adversity, and attendance at school can itself be an important protective factor. Local authorities should share the fact that a child has a social worker and the DSL will record this on MyConcern, so that appropriate members of staff have access to this information where this is necessary to safeguard and support the child.

Where children need a social worker, this will inform decisions about safeguarding, for instance responding to unauthorised absence or similar indications of possible risk, and about promoting welfare, like the provision of pastoral and/or academic support. The school will have particular regard to attendance, recognising that absence for a child with a social worker may indicate additional safeguarding or welfare concerns.

The Virtual School Head has a non-statutory strategic responsibility for promoting the educational attendance, attainment and progress of children with a social worker. The DSL and other relevant senior staff will engage with

the Virtual School Head and other professionals where this may support improved educational and safeguarding outcomes for these children. This role is strategic and does not replace the direct responsibilities of the child's social worker or the school towards an individual child.

Further information can be found in the Department for Education [guidance on promoting the education of children with a social worker and children in kinship care arrangements](#), together with the statutory guidance on [promoting the education of looked-after and previously looked-after children](#).

Young Carers

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

Private Fostering

If a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility or relative in their own home this is private fostering. It is not considered private fostering if the person caring for and accommodating the child has done so for fewer than 28 days and does not intend to do so for longer.

Where the school becomes aware of a private fostering arrangement this should be raised with the DSL. Where the school becomes aware of an arrangement which it has not been involved in making, it should notify the local authority so that the local authority can check that the arrangement is suitable and safe for the child. Where the school is involved, directly or indirectly, in arranging for a child to be privately fostered, it must notify the local authority as soon as possible after the arrangement has been made. The notification must be made in writing and contain the information required by the Private Arrangements for Fostering Regulations 2005.

13. Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers arise when recognising abuse, neglect and exploitation in this group of children. It can sometimes be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration. In addition, these children can also be disproportionately impacted by things like bullying, including prejudice-based bullying, without outwardly showing any warning signs, often due to communication barriers, isolation, dependency on others etc. They may also experience difficulties in managing or reporting safeguarding concerns, may not understand that what is happening to them is abuse, may require intimate care, may be isolated from others, and may be more dependent on adults for care.

SEND students also face additional risks online from potential bullying, grooming or radicalisation and should be supported to stay safe online. Some children may also have difficulties with cognitive understanding, including distinguishing between fact and fiction in online content, and may repeat online content or behaviours without understanding their consequences.

Staff must ensure that the child's safety and welfare remain central to decision-making and avoid attributing safeguarding indicators automatically to a child's SEND or medical condition.

St Benedict's ensures that students on our SEND register receive additional pastoral support, with key workers to help support them in addition to the usual pastoral structure of the school. Where there is a report of abuse involving a child with SEND, there will be close liaison between the DSL or deputy and the SENCO. Appropriate support for communication will also be put in place where required.

These children can also suffer abuse in ways other than via overt physical or sexual assaults, which means that staff need to be mindful of a wide range of issues when working with these young people. For example, privacy, dignity and respect, food, mobility/restraint, intimate care, finances, medication, the use of aids and adaptations. Staff should be particularly mindful that the need for intimate care, physical assistance or dependence on adults can itself increase vulnerability and that safeguarding concerns may present differently for different children.

In order to safeguard children with more complex needs, staff in school will work especially hard to develop the skills they need to give them a 'voice'. In practice, three essential questions always need to be asked:

What is expected of this child? - Developmentally, behaviourally etc.

Do I/we understand how any condition, disability, impairment or other factor, e.g. culture, impacts?

How well can I/we understand and communicate with this child?

National guidance makes it clear that for some children it is not yet possible to prescribe techniques for communicating about possible abusive experiences in ways which are reliable and evidentially safe. Spontaneous disclosures are rare from disabled children, especially those who use alternative or augmentative communication systems and abuse is more likely to be identified via physical signs, behavioural responses and/or emotional presentation/changes. It is therefore imperative that staff are sensitive to what might be very subtle indicators, especially where children have multiple disabilities, and that regular consultation occurs between the SENCO and DSL in school, especially in circumstances where issues and/or concerns arise.

Staff should not wait for a direct verbal disclosure before acting on a safeguarding concern. Any changes in behaviour, mood, presentation, relationships, attendance or engagement which may indicate abuse, neglect or exploitation should be considered in the context of the individual child rather than being assumed to arise from SEND.

When applying disciplinary measures to SEND students, the risks will be considered so that they do not add to the vulnerability of the child, for instance where a student is removed from class as a sanction. The school will make

reasonable adjustments where needed. St Benedict's never uses restraint as a sanction. Restraint, and any seclusion used for a reason other than as a sanction, must be recorded and reported to parents as set out in Section 7. The school will consider whether reasonable adjustments are required and will take account of its duties under the Equality Act 2010.

The SEND department works with the pastoral team and all the staff to ensure that there is a clear set of guidelines of how best to work with each of the children on the SEND register, in particular by planning positive and proactive behaviour support to avoid problems in advance. Where reasonable force or another restrictive intervention is being considered in relation to a child with SEND, mental health problems or a medical condition, the school will recognise the additional vulnerability of these children and consider how positive and proactive behaviour support and individual planning can reduce the likelihood that restrictive intervention will be required.

KCSIE provides links to further support including the SEND Code of Practice, guidance on supporting pupils at school with medical conditions, SENDIASS, Mencap and NSPCC safeguarding resources for children with SEND.

14. Children with Mental Health Problems

St Benedict's has a separate mental health policy to be read in conjunction with this.

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. Mental health difficulties can also be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. While only appropriately trained professionals should attempt to diagnose mental health problems, education staff nevertheless have an important role to play in 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 be at risk of developing one; ensuring early targeted support is provided; and liaising with or referring to specialist services where needed.

If a child has suffered abuse, neglect or other potentially traumatic experiences, this can have a lasting impact and staff need to be aware of how these experiences can affect mental health, behaviour and education. If staff have a mental health concern, particularly if it is associated with a safeguarding concern, they should record this on MyConcern and, where there is a safeguarding concern, speak to the DSL or a deputy without delay. Safeguarding concerns should be responded to in accordance with the procedures set out elsewhere in this policy and should not be treated solely as mental health issues.

Where a child needs additional mental health support, the DSL or a deputy will consider whether parents or carers should be informed in order to support the child's wellbeing, unless doing so would place the child at additional risk.

In the first instance if mental health issues are identified, St Benedict's will look to provide support with the SEND department and school counsellor among the possible sources of support. The school will consider the range of support available locally and provide appropriate early and targeted support according to the needs of the individual child. If it is felt that it would be helpful and that the threshold would be met, we will make a referral to appropriate specialist children and young people's mental health services, including CAMHS where appropriate, and/or support the child and their family in accessing these services through their GP or other available referral routes. Where available and appropriate, the school will also make use of support and advice from its local Mental Health Support Team and other relevant local services.

St Benedict's helps to prevent mental health problems by promoting resilience across the curriculum, and in particular through the PSHE programme as part of an integrated whole-school approach to social and emotional wellbeing. This approach seeks both to promote positive mental health and wellbeing and to identify and support emerging difficulties at an early stage. The school counsellor is the senior mental health lead for St Benedict's, working together with the DSLs, pastoral team of Division Heads, school nurse and SENCO to promote wellbeing and mental health. The senior mental health lead supports the school in embedding a whole-school approach to mental health and wellbeing and in ensuring appropriate links are maintained with specialist and community services.

There are a range of useful resources and sources of support, including the Department for Education's guidance on [promoting children and young people's mental health and wellbeing](#) and its resources on [promoting and supporting mental health and wellbeing in schools and colleges](#). The [NHS Every Mind Matters](#) service also provides information and advice for supporting children and young people's mental health, while the [Hub of Hope](#) provides information about local and national mental health support services.

15. Safeguarding Children with Medical Conditions

An incident relating to the management of a medical condition (including allergies) does not in itself warrant a safeguarding referral, but a referral *is* needed where the incident suggests increased risk of neglect, abuse or exploitation — for example, where relevant information about the condition is withheld from the school, or where a child is repeatedly sent in without essential medication. Further guidance and information can be found in [Supporting Pupils at School with Medical Conditions](#) and [Allergy safety in schools](#).

Mr Patrick McCarthy (Senior Deputy Head) is the school's Designated Allergy Lead, supported by **Mrs Áine Yue** (Head of Student Wellbeing, Senior Deputy DSL and Senior School Nurse).

16. Diversity and Inclusion

While not specified in KCSIE, St Benedict's works actively to educate against all discrimination and promote inclusion in other key areas including race, gender and neurodiversity. These topics are also covered in the PSHE curriculum, and there is ongoing staff training in Diversity and Inclusion to encourage understanding of these issues and promote dialogue and student voice. Mr McCarthy, in his role as Senior Deputy Head, takes a lead on Diversity and Inclusion at St Benedict's.

St Benedict's recognises that being lesbian, gay or bisexual is not in itself a safeguarding risk. However, children who are lesbian, gay or bisexual, or who are perceived by others to be lesbian, gay or bisexual, may be vulnerable to discriminatory bullying or harassment. The school takes a strong and proactive approach to preventing and responding to such behaviour, including through appropriate sanctions where necessary.

Because of this risk St Benedict's includes lessons on understanding sexual orientation, equality, respect and discrimination in its PSHE curriculum. In addition, Mr Foley, in his role as DSL, and Mrs Yue, in her role as Head of Student Wellbeing, are designated members of staff who act as points of contact for students to speak out and share their concerns. Students may, however, raise concerns with any member of staff whom they trust.

KCSIE 2026 now contains detailed guidance for schools on children who are questioning their gender. The school recognises that children may question how they feel about being a boy or a girl, including the physical attributes of their sex and how they fit into society. It is not the role of St Benedict's to initiate social transition or to encourage a child towards any particular outcome. Staff should take time to understand the child's thoughts and feelings, remain professionally curious about the full range of their experiences and be alert to any associated safeguarding or welfare needs, including mental health or psychosocial difficulties, relationships with family or peers, neurodiversity and discriminatory bullying.

The school will avoid rigid assumptions based upon gender stereotypes. Children should be able to express interests, behaviour and preferences which do not conform to stereotypes associated with their sex without this in itself being treated as evidence that they are questioning their gender.

Requests for support with social transition

Where a child or their parent or carer asks the school to make changes to facilitate the child presenting as the opposite biological sex, this will be treated as a request for support with social transition. Staff must not themselves initiate social transition or make changes relating to social transition unless a decision has been made by the school following the process below.

All such requests will be considered carefully and individually. The decision-making process and the reasons for decisions will be recorded. The DSL will be involved and the school will consider its safeguarding duties together with its obligations under equality and human rights law.

The first consideration will be what is in the best interests of the child and of other children who may be affected. The school will listen carefully to the child and take their wishes and feelings seriously, but a decision made in their best interests will not necessarily be the same as the course of action initially requested by the child.

The school will consider the full circumstances of the individual child. This may include their age and developmental stage; mental and physical health; any neurodiversity or SEND; family and peer relationships; any evidence of bullying or other safeguarding concerns; relevant clinical evidence or advice; and advice from appropriate professionals such as the SENCO and DSL. KCSIE particularly emphasises the importance of professional curiosity about the wider circumstances and vulnerabilities of a child who is questioning their gender.

Parents and carers have a leading role in their child's life and will normally be involved as a matter of priority where a child requests support with social transition. Their views will be given significant weight and the school will normally work with the child and their parents or carers to establish what is in the child's best interests. The

school may offer to support the child in discussing the matter with their parents, including by arranging for a member of staff to be present or, where appropriate, to speak to parents on the child's behalf.

In the rare circumstances where involving parents or carers may place the child at greater risk, the DSL must be involved before parents are contacted or decisions are taken, and the school will follow its normal safeguarding procedures.

Where a child simply talks confidentially to a member of staff about questioning their gender but does not ask the school to change how they are treated, there is no reason solely on that basis to break the child's confidence or initiate a process of social transition. Confidentiality may need to be broken where the conversation raises a safeguarding or welfare concern, in accordance with the normal safeguarding procedures in this policy.

A careful approach to social transition

KCSIE 2026, reflecting the findings of the Cass Review, states that social transition should be viewed as an active intervention and that there is a lack of good evidence about its long-term impact on young people. St Benedict's will therefore take a careful, individual and non-directive approach to any request for social transition.

Particular caution will be exercised with younger children. Where a pre-pubertal child is considering social transition, the school will recognise the importance of appropriate clinical involvement and of keeping options open and flexible. School staff will not attempt to provide clinical advice about the risks or benefits of social transition unless appropriately qualified to do so. Older children will generally have greater agency in decisions concerning them, but the school will continue to consider their best interests and seek to avoid placing a child under pressure to commit to a particular pathway.

School arrangements

In considering any request for social transition, St Benedict's will comply with its duties under the Equality Act 2010 and Human Rights Act 1998 as well as its safeguarding obligations. Where it is unclear whether a gender-questioning child has the protected characteristic of gender reassignment, the school will proceed on the basis that they may do so when considering its Equality Act obligations.

In accordance with KCSIE 2026, the Education (Independent School Standards) Regulations 2014, and School Premises (England) Regulations 2012, separate toilet facilities are provided for boys and girls aged 8 and above and pupils will not be permitted to use toilets or changing rooms designated for the opposite biological sex. Where a child does not wish to use facilities designated for their biological sex, the school will consider whether suitable alternative arrangements can be provided, for example an individual self-contained facility, without compromising the safety, privacy, comfort or dignity of that child or other pupils. Where toilet facilities are unisex (i.e. disabled access toilets) these are individual, lockable rooms which open directly onto public areas, such as corridors.

Where the school operates single-sex sport or PE for reasons of safety, pupils will not participate in sport designated for the opposite biological sex, with no exceptions (as stated in KCSIE 2026). The Equality Act 2010 contains an exception in relation to single-sex sport. It applies to participation in any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This means that schools can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex.

For other school rules or arrangements affected by a request for social transition, the school will consider the particular circumstances on a case-by-case basis. It will consider whether the rule serves a legitimate aim, such as safeguarding, and whether its application is a proportionate means of achieving that aim, balancing the effect upon the individual child with the effect upon other children.

Any constraints on a requested social transition will be explained sensitively to the child and their family. The school will continue to challenge and sanction bullying and harassment. It will also respect the lawful rights of other pupils and staff, including rights relating to religion or belief. Where appropriate, practical arrangements may be explored, such as using a child's name rather than requiring others to use particular pronouns.

Recording and reviewing arrangements

Any agreed arrangements will be clearly recorded, communicated only to those staff who need the information and kept under review. Circumstances and a child's needs may change, and previous decisions may therefore need to be reconsidered. The DSL will be involved immediately where new safeguarding issues arise, or a previous arrangement is being reconsidered for safeguarding reasons.

Accurate information about a child is important for safeguarding. In accordance with KCSIE 2026, St Benedict's will ensure that a child's biological sex is recorded accurately wherever the school is legally required to record it and that relevant staff have access to accurate information where this is necessary to discharge their safeguarding responsibilities.

The school will be particularly alert to the safeguarding needs of a child who has socially transitioned from a young age and is 'living in stealth', where peers or members of staff may not know the child's biological sex. The DSL will be involved in considering the safeguarding implications in such cases.

If a child wishes wholly or partly to reverse a previously agreed social transition, St Benedict's will support them to do so. The school will work with the child, their parents or carers and relevant professionals, recognising the importance of maintaining flexibility and keeping options open.

17. Early Years Foundation Stage (EYFS)

No member of staff or volunteer may begin working in the EYFS setting until the school has received their enhanced DBS certificate including children's barred list information. There is no provision for a supervised start pending receipt of the certificate. Requirements relating to childcare disqualification are set out in Appendix 2b.

As with all staff, EYFS staff and volunteers are given safeguarding training. All EYFS practitioners will receive safeguarding training appropriate to children aged 0–5 and meeting the criteria set out in Annex C of the EYFS Statutory Framework. Volunteers will receive safeguarding training and induction appropriate to their role. Practitioners will be supported so that they are confident in implementing the school's safeguarding policy and procedures in practice. Safeguarding training for practitioners will be renewed at least every two years, with refresher training provided during that period where appropriate.

Training will include how to identify signs of possible abuse, harm and neglect at the earliest opportunity and how to respond, record and refer safeguarding concerns and allegations in a timely and appropriate way. These may include:

- Significant changes in children's behaviour
- A decline in children's general well-being
- Unexplained bruising, marks or signs of possible abuse or neglect
- Concerning comments or behaviour from children
- Any reasons to suspect neglect or abuse outside the setting, for example in the child's home, including that a child may experience emotional or physical abuse through witnessing domestic abuse or coercive control, or that a girl may have been subjected to, or be at risk of, female genital mutilation; and/or
- Inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example: inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images

All practitioners must remain alert to issues of concern in a child's life at home or elsewhere. Any safeguarding concerns should be reported immediately in accordance with the procedures set out elsewhere in this policy. Where there are concerns about a child's safety or welfare requiring referral, the school will contact local authority children's social care in accordance with local procedures and, in an emergency, the police.

The DSL will provide ongoing safeguarding support, advice and guidance to EYFS practitioners and will undertake safeguarding training which meets the requirements for DSLs contained in Annex C of the EYFS Statutory Framework.

The school's policy on the use of mobile phones and cameras in the EYFS setting is set out as per the EYFS Statutory Framework and can also be found in the ICT Acceptable Use Policy for Employees and the Staff Code of Conduct. In accordance with the EYFS Statutory Framework, the policy covers mobile phones and cameras and also other electronic devices with imaging or sharing capabilities, such as tablets and smart watches. It includes the following:

- Any personal digital recording device including personal mobile phones, cameras and video recorders or other personal electronic devices with imaging or sharing capabilities cannot be used when in the presence of children either on school premises or when on outings
- All mobile phones and other personal electronic devices with imaging or sharing capabilities must be stored securely within the setting during contact time with children. This includes staff, visitors, parents, volunteers and students, including the school's Sixth Form mentors
- No parent is permitted to use their mobile phone or use its camera facility whilst inside the EYFS setting. School policy regarding this matter should be explained clearly to parents by the Head of EYFS
- Mobile phones and other personal electronic devices must not be used in any teaching area within the setting or within the bathroom or intimate care area
- In the case of a personal emergency, staff should use the school telephone. It is the responsibility of all staff to make families aware of the school telephone numbers

- Personal calls may be made in non-contact time but not within the teaching areas
- Personal mobiles, cameras or video recorders should not be used to record classroom activities. ONLY school equipment or other school-approved devices and systems should be used
- Images and recordings of children must only be made, transferred, stored and shared using school-approved equipment and secure systems and in accordance with the school's data protection and safeguarding procedures. The number of images and videos taken of children will be kept to that which is reasonably necessary and images will only be shared with parents/carers through technically secure methods
- All telephone contact with parents/carers must be made on the school telephone and should be recorded
- During group outings, nominated staff will have access to the school mobile which can be used in an emergency or for contact purposes
- In the case of school productions, parents/carers are permitted to take photographs of their own child in accordance with school protocols which strongly advise against the publication of any such photographs on social networking sites

Children's use of screens and digital technology

From 1 September 2026, the EYFS Statutory Framework requires providers to have regard to the Department for Education's guidance on children's screen use in early years settings. St Benedict's will therefore take a careful and age-appropriate approach to the use of screens in the EYFS. Screen use will be limited, purposeful and clearly linked to appropriate learning and development aims and will not replace high-quality interaction between children and adults, physical activity, outdoor play, stories or interaction with other children.

For children aged two to five, screen use should be limited and the school will have regard to the government recommendation of no more than one hour per day, recognising that children may also use screens at home. These limits do not apply in the same way to appropriate assistive technology used by children with SEND.

Children will not ordinarily access screens independently without appropriate adult co-engagement. Content will be checked in advance to ensure it is safe and age appropriate. Staff will take particular care to avoid inappropriate, fast-paced or algorithm-driven content and will not use screens simply to occupy children, manage behaviour or calm them.

The use of digital devices by practitioners for assessment, administration or communication with parents will also be proportionate so that it does not unnecessarily reduce direct interaction with observation of, or supervision of children.

The school will notify local child protection agencies of any serious accident or injury to, or the death of, any child while in its care, and will act on any advice from those agencies. Where notification requirements to Ofsted apply to the provision, the school will also notify Ofsted of any serious accident, illness or injury to, or death of, a child while in its care and of the action taken, as soon as reasonably practicable and in any event within 14 days.

18. Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This may involve an exchange for something the child needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, and/or violence or the threat of violence. CSE can be committed or facilitated by an organised network or gang and the victim may identify as being part of that group. Most sexual abuse is committed by those previously known to the victim.

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

CSE can affect children of any sex and can include children who have been moved or trafficked for the purposes of exploitation. CSE and other forms of exploitation can overlap and, where trafficking or modern slavery is involved, the exploitation may constitute modern slavery.

It can involve violent, humiliating and degrading sexual assaults. Sexual abuse may involve physical contact, including assault by penetration or non-penetrative acts, or non-contact activities such as involving children in the production of sexual images, forcing them to look at sexual images or watch sexual activity, encouraging sexually inappropriate behaviour or grooming a child in preparation for abuse, including online.

A child cannot consent to being exploited, abused or trafficked. This remains the case where a 16- or 17-year-old is legally able to consent to sexual activity. A child may believe that they are voluntarily engaging in a sexual or romantic relationship without recognising that they are being exploited.

Professionals continue to encounter cases where children are manipulated, groomed and exploited without fully understanding the abuse they are experiencing. Children can be groomed by other children and/or exploited as part of gang-related activity or by a wider organised network. Where another child is involved in perpetrating exploitation, staff should consider whether that child is themselves being exploited and should also be recognised as a potential victim.

CSE does not always involve physical contact and can happen online. It can include contact activity, whether penetrative or non-penetrative, and non-contact sexual activity. It can even occur without the child's immediate knowledge through others sharing videos or images they have posted online. As with Child Criminal Exploitation (CCE), victims are not always recognised and can be criminalised for actions they take whilst under coercion. Staff must therefore look beyond a child's presenting behaviour and consider whether apparently criminal, risky or challenging behaviour may itself be a consequence of exploitation.

CSE can affect any child or young person under 18 years old, including 16 and 17 year olds who can legally consent to have sex. It can be perpetrated by individuals or groups, males or females, adults or children, who themselves might be experiencing exploitation and so might also be seen as a victim. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of securing compliance and may, or may not, involve violence or threats of violence.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Staff should recognise that indicators of CSE frequently overlap with those of Child Criminal Exploitation. KCSIE identifies indicators which may include children who:

- suffer from sexually transmitted infections, become pregnant or display sexual behaviour beyond that expected for their stage of sexual development

- go missing for periods of time, regularly come home late, regularly miss school or education, or stop taking part in education
- experience changes in their emotional wellbeing
- associate with other children who are involved in exploitation or have older boyfriends or girlfriends
- alcohol or other drugs; and/or
- appear with unexplained gifts, money or new possessions, which may indicate involvement with individuals associated with criminal networks or gangs and possible criminal or sexual exploitation

No single indicator proves that a child is being exploited, and the absence of these indicators does not mean exploitation is not taking place. Staff should consider the child's circumstances as a whole and remain alert to patterns or changes in behaviour. Children who have been exploited may also require additional support to remain engaged in education.

Further information can be found in the Department for Education's [Child sexual exploitation: guide for practitioners](#) and the further resources signposted in KCSIE. Any concerns relating to CSE will be reported to the DSL who will follow safeguarding referral procedures.

KCSIE makes clear that exploitation may constitute modern slavery. The National Referral Mechanism (NRM) is the UK framework for identifying and supporting potential victims of modern slavery and trafficking. Where a potential victim of CSE is identified, the DSL will ensure that the relevant child protection referral is made and, where modern slavery or trafficking may be involved, that the appropriate modern slavery referral process is followed with the relevant agencies.

Child sexual exploitation is widely unreported because it relies on the vulnerabilities of children in a way that makes them feel unable to share their experience with others. Children may also fail to disclose because they do not recognise that they are being exploited, regard the perpetrator as a friend or romantic partner, identify with the group or network exploiting them, fear repercussions, or have themselves been drawn into offending behaviour.

If staff have any concern that a child may be being sexually exploited, they must report this to the DSL or a deputy without delay. The DSL will consider the appropriate referral to local authority children's social care and, where appropriate, the police and other relevant agencies. Where a child is suffering or is likely to suffer harm, the appropriate referral will be made immediately. Staff should not wait for proof that exploitation has occurred before raising a safeguarding concern.

There are a number of things that we can do to prevent CSE and/or help other agencies to disrupt the activities of those engaging or intent on engaging in it. Via the curriculum and through engagement with parents and carers we will raise awareness around healthy relationships and, where appropriate, CSE and grooming processes, including how this can happen online. Teaching will help children understand healthy and unhealthy relationships, consent, coercion, grooming and exploitation, including the ways in which relationships, social media and other online platforms may be used to target and manipulate children.

Information sharing is vital in identifying and tackling all forms of abuse and *especially* child sexual exploitation. We will be vigilant, seek advice, monitor attendance, particularly in cases of repeated or prolonged absence, keep robust registers, share information and contribute effectively to multi-agency processes designed to prevent, disrupt and/or prosecute perpetrators of CSE. Different forms of harm frequently overlap, and information about possible criminal exploitation, sexual exploitation, serious violence, missing episodes or trafficking will therefore be considered together rather than in isolation.

We are also mindful of our contribution to processes designed to protect children who have been victims of CSE:

Physically - Making it as hard as possible for perpetrators to gain access to young people, face-to-face but also via phones, online etc.

Relationally - By ensuring that young people experience safe, stable relationships which counteract the abuse and, for Looked After Children, provide stability in terms of education and placements.

Psychologically - Helping young people to find a source of positive identity outside of abusive relationships. Also providing extra support to help maintain their educational attainment.

Educationally - Recognising that exploitation can significantly affect attendance, engagement and attainment and providing additional support where necessary to help children remain safely engaged in education.

19. Child Criminal Exploitation (CCE), Serious Violent Crime, County Lines and Modern Slavery

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity. It may involve an exchange for something the child needs or wants, and/or be for the financial advantage or increased status of the perpetrator or facilitator, and/or involve violence or the threat of violence. CCE may be committed or facilitated by an organised network or gang, and the child may identify as being part of that group. The victim may have been criminally exploited, abused or trafficked even if the activity appears consensual and they may not even recognise that it is happening to them. It is not possible for a child to consent to being exploited, abused or trafficked.

Children affected by CCE may be moved or trafficked for the purpose of exploitation. This may constitute modern slavery and, where a potential victim is identified, relevant child protection procedures and modern slavery referral arrangements should be followed.

CCE does not always involve physical contact and can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money for county lines activity, forced to shoplift or pickpocket, being manipulated into vehicle crime, or to threaten or commit serious violence against others.

Children can become trapped in criminal exploitation because perpetrators threaten them or their families with violence, create debts which the child is required to repay, or otherwise manipulate and coerce them. Children may be coerced into carrying weapons, including knives, or may begin carrying a weapon because they believe it is necessary to protect themselves. Staff must recognise that apparent offending behaviour may therefore itself be an indicator that a child is being exploited.

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals, particularly older children, and should be treated as victims.

Indicators of CCE and CSE frequently overlap. Possible indicators include a child:

- appearing with unexplained gifts, money or new possessions
- associating with other children who are involved in exploitation
- experiencing changes in emotional wellbeing
- misusing alcohol or drugs
- going missing for periods of time or regularly coming home late; and/or
- regularly missing school or education or ceasing to take part in education

In relation specifically to serious violence, staff should also be alert to increased absence from school, changes in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or significant changes in wellbeing, assault or unexplained injuries, and unexplained gifts or possessions. Risk may be increased for children who have experienced disrupted education, including suspensions, permanent exclusion or time in alternative provision, those who have experienced maltreatment, those with a history of offending or early drug or alcohol use, and those who have previously experienced or perpetrated violence.

If any of these warning signs are noticed by a member of staff, they should enter them onto MyConcern and speak to the DSL or a deputy without delay. A member of staff should not wait for evidence that exploitation has occurred before reporting a concern. As always in child protection and care, early intervention is the most effective way of helping potentially vulnerable children.

Any concern that a child is carrying or using a weapon, or has expressed an intention to do so, must be reported to the DSL or a deputy. The DSL will assess the risk both to the individual child and to others, taking account of wider safeguarding information and concerns. Depending on the circumstances, a safety and support plan will be put in place and action considered to de-escalate any peer conflict. The police and/or local authority children's social

care will be involved where appropriate. KCSIE 2026 makes this an explicit part of the response to serious violence. See also [Government Guidance on Child Knife Possession Offences](#)

St Benedict's looks to prevent violence within school or student involvement outside school through a number of methods:

- Our PSHE curriculum and regular discussions with tutors include information about how to be safe around London, how to deal with dangerous incidents and avoid exploitation by potentially dangerous groups. Teaching also addresses healthy relationships, coercion, exploitation, online recruitment and the risks associated with weapons and serious violence
- Aggressive behaviour is challenged rigorously by our behaviour policy
- Through effective recording on MyConcern and the sharing of appropriate safeguarding information, the school seeks to identify patterns and provide early support to children who may be vulnerable to exploitation or serious violence
- St Benedict's always ensures that any safeguarding information is passed on to other institutions when students leave us, and that information relating to pupils who join us is sent by other institutions
- We work closely with local council services and the police with regard to dealing with anti-social behaviour or crime in the area
- The school will consider when and where children may be at greatest risk, including on journeys to and from school and immediately before or after the school day, and will work with pupils, parents and external partners where necessary to understand and reduce those risks
- Children identified as being at risk will be offered appropriate early support. This may include access to a trusted adult, support with social and emotional skills and, where appropriate and available, targeted interventions such as mentoring or therapeutic support

KCSIE emphasises that schools have an important role not only in protecting victims of violence but also in safeguarding children who are at risk of, or involved in committing, violence, since those children may themselves be victims.

County Lines and Modern Slavery

Often related to serious violent crime, and a significant national risk for vulnerable children across the country, is 'county lines' activity. 'County lines' is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using a dedicated mobile phone line or other form of 'deal line'. Children and vulnerable adults may be exploited to move, store and sell drugs and money, and perpetrators will often use coercion, intimidation, violence, including sexual violence, and weapons.

Despite the term 'county lines', the activity can take place locally as well as across the UK and no particular distance of travel is required.

Children can be targeted and recruited in many locations, including schools, special schools, alternative provision, further and higher education settings, children's homes and care homes. Children are also increasingly targeted and recruited online, including through social media. They are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

Children can become trapped in this exploitation by gangs creating drug debts or threatening serious violence or kidnapping towards victims or their families if they attempt to leave the county lines network. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

Indicators of county lines exploitation can include a child going missing from school or home and subsequently being found away from their home area. Where trafficking or modern slavery is suspected, the relevant child protection referral must be made and referral through the National Referral Mechanism should be pursued through an appropriate First Responder.

Other possible indicators are being the victim, perpetrator or alleged perpetrator of serious violent crime; being involved in receiving requests for drugs through a phone line, moving drugs or handing over or collecting money; being exposed to 'plugging'; being found in accommodation where they have no connection, sometimes described as a 'trap house' or 'cuckooing' or a hotel room associated with drug activity; owing a 'debt bond' to exploiters; or having their bank account used to facilitate drug dealing.

Involvement in these forms of exploitation is extremely risky for any child, not just because of the potential for a criminal record but also because of the risk of physical and/or sexual abuse by gangs with which they might become involved. The school will recognise first and foremost the safeguarding needs of an exploited child and will not allow apparent criminal behaviour to obscure the possibility that the child is a victim.

Further guidance and support is available through the [Home Office guidance on criminal exploitation and county lines](#), the [Child Exploitation Disruption Toolkit](#), the [Youth Endowment Fund](#) and other resources identified in KCSIE.

Potentially linked with this is the issue of modern slavery. This encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

KCSIE makes clear that whatever form it takes, exploitation and modern slavery are forms of child abuse and relevant child protection procedures must be followed where modern slavery or trafficking is suspected. The National Referral Mechanism (NRM) is the UK framework for identifying and supporting potential victims of exploitation and modern slavery. Some children may also be entitled to support from an Independent Child Trafficking Guardian.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims, and how to refer them to the National Referral Mechanism is available in the [Modern Slavery: Statutory Guidance for England and Wales](#) and the other child exploitation resources signposted in KCSIE

20. Honour or Faith-Based Abuse (HBA), including Female Genital Mutilation and Forced Marriage

Honour or faith-based abuse (HBA), including Female Genital Mutilation and Forced Marriage, encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse, regardless of the motivation, and should be handled and escalated as such. If staff have any concerns that a child might be at risk of HBA or has already suffered HBA, they should speak to the DSL or a deputy without delay. The DSL will activate local safeguarding procedures as appropriate, including liaison with the police and local authority children's social care. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

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. Staff should therefore consider the possible involvement of members of the wider family or community when assessing risk and should not assume that disclosure to, or involvement of, family members will necessarily increase a child's safety. Decisions about involving parents or family members will be made in conjunction with the DSL and, where appropriate, children's social care or the police.

There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may already have taken place, can be found in KCSIE and the Government's multi-agency practice and statutory guidance on [forced marriage](#) and [FGM](#).

Forced Marriage

Forced marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional or psychological. A person may also lack the capacity to give full and free consent, for example because of a learning disability. This is different from an arranged marriage where the couple still have the right to accept or reject the arrangement.

In addition, since February 2023, it has been a criminal offence to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even where violence, threats or another form of coercion are not used. This applies to non-binding and unofficial marriages as well as legally recognised marriages.

If staff have a concern regarding a child that might be at risk of HBA, including forced marriage, they should follow procedures for other safeguarding concerns as seen in Flowchart 1 and speak to the DSL or a deputy immediately. Staff should not approach family members or attempt to mediate where doing so could increase the risk to the child. The DSL will seek advice and make referrals to children's social care, the police and/or the Forced Marriage Unit as appropriate.

The Forced Marriage Unit can provide specialist advice and support to schools where there are concerns about forced marriage.

Female Genital Mutilation (FGM)

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

Teachers must personally report to the police where, in the course of their professional duties, they are informed by a girl under 18 that FGM has been carried out on her or observe physical signs which appear to show that FGM has been carried out. It will be rare for a teacher to observe such physical evidence and staff must not examine a pupil in order to establish whether FGM has taken place.

The teacher who discovers the FGM has a personal statutory duty to make the report and cannot discharge this responsibility simply by passing the matter to the DSL. The recommended route is to make the report to the police by calling 101, unless there is an immediate risk of serious harm, in which case 999 should be used.

Unless there is a good reason not to do so, the teacher should also discuss the case with the DSL or a deputy and local authority children's social care should be involved as appropriate.

Contact with ECIRS should be made on 020 8825 8000, or with the equivalent children's social care service where the child lives, where a safeguarding referral is required. ECIRS provides Ealing's single point of contact for concerns about the welfare or safety of a child, and the number operates 24 hours for emergency calls.

The specific FGM mandatory reporting duty does not apply where a child is only suspected to be at risk of FGM, where there is no disclosure or physical evidence that it has already taken place, or where the person disclosing FGM is aged 18 or over. These situations may nevertheless present serious safeguarding concerns and staff must follow the school's normal safeguarding procedures, including speaking to the DSL and making appropriate referrals to children's social care and/or the police.

Further guidance can be found in [*Multi-agency statutory guidance on FGM*](#) and the Government's [*Mandatory reporting of female genital mutilation: procedural information*](#).

21. Radicalisation/Extremism

Children may be susceptible to radicalisation into terrorism and, as with other forms of harm or abuse, protecting children from this risk is part of our safeguarding duty. There is no single way of identifying whether a child is susceptible to radicalisation and staff should use their professional judgement, taking account of the child's behaviour, circumstances and any changes which may indicate that they need help or protection.

Any potential concern regarding radicalisation or extremism should be noted on MyConcern and raised with the DSL or a deputy without delay. The DSL will consider the concern in accordance with normal safeguarding procedures and decide what further action is appropriate, including whether a Prevent referral and/or a referral to local authority children's social care is required. Staff should not delay raising a concern because they are uncertain whether the threshold for a Prevent referral has been met.

Where a Prevent referral is appropriate, St Benedict's will follow the current Ealing and national Prevent referral procedures and use the national Prevent referral form. A referral is assessed initially by the police and may subsequently be considered by a multi-agency Channel panel. Where there is an immediate risk to life or safety, the police should be contacted on 999. KCSIE expressly requires DSLs and deputies to know their local Prevent referral procedures. Current Ealing guidance directs professionals making a Prevent referral to send the national referral form to the Metropolitan Police Prevent referrals team and copy it to Ealing Prevent; Ealing's local threshold guidance also incorporates ECIRS into the safeguarding process.

St Benedict's uses the definitions used in KCSIE and the Government's Prevent guidance.

Extremism is:

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

Radicalisation is:

'The process of a person legitimising support for, or use of, terrorist violence.'

Terrorism is:

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

There is no place for extremist views which seek to legitimise, encourage or support terrorism in our school, whether from internal sources, pupils, staff or governors, or external sources, including members of the wider school community, external agencies or individuals. Our pupils should experience our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this. The Prevent duty does not mean avoiding difficult or controversial issues. Pupils should be able to discuss them in a safe environment, develop critical thinking and learn how extremist narratives can be challenged. The school will also remain mindful of its duties concerning political impartiality and the balanced presentation of political issues.

Extremism and exposure to extremist materials and influences can contribute to radicalisation in some circumstances. There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism.

Staff should instead remain alert to the overall context and to changes in a child's behaviour which may indicate susceptibility to radicalisation. Relevant concerns might include, for example, accessing, producing or sharing material which supports or glorifies terrorism; expressing support for terrorist violence; association with people or networks of safeguarding concern; increasingly concerning online activity; attempts to recruit or influence others

towards terrorist ideology; or significant changes in behaviour alongside other indicators of vulnerability. Any such indicators must be considered in context rather than treated as a checklist.

Expressions of controversial, unpopular, religious or political views do not in themselves establish that a child is being radicalised. Similarly, misogynistic, racist, homophobic or other prejudicial material may present serious behaviour or safeguarding concerns without necessarily being Prevent-related. Where such material appears connected to extremist narratives which can reasonably be linked to terrorism, staff should consider the possibility of radicalisation and seek advice from the DSL.

In line with the Counter-Terrorism and Security Act 2015, the school has due regard to the need to prevent people from becoming terrorists or supporting terrorism. The school will maintain a proportionate Prevent risk assessment, taking account of national, regional and local risks, the age of its pupils, its particular context and online risks. Where specific risks are identified, appropriate steps will be taken to mitigate them. The DSL acts as the school's senior lead for the operational delivery of Prevent.

The school's approach will reflect the three themes identified in the Prevent Duty Guidance: leadership and partnership; capabilities, including understanding and managing risk and sharing information; and reducing permissive environments in which radicalising influences may operate. The statutory Prevent guidance also says each education setting should conduct a risk assessment covering how pupils or staff may be exposed to radicalisation, including online, and produce mitigating actions where risks are identified.

When the school hosts visiting speakers, there are clear, set protocols for ensuring that these are suitable and appropriately supervised (see Appendix 5). Appropriate due diligence will be undertaken, taking account of the educational value and age-appropriateness of the event, safeguarding considerations, political impartiality and any Prevent-related concerns.

Our school will work in partnership with other agencies and co-operate productively, in particular with local Prevent co-ordinators, the police and Ealing children's safeguarding services, following current local and national procedures for safeguarding children who may be susceptible to radicalisation.

The school's ICT policies contain robust procedures and practice to ensure children are safe from extremist material when accessing the internet in school, including by ensuring suitable filtering and monitoring is in place. The appropriateness of the school's filtering and monitoring arrangements will be informed in part by its Prevent risk assessment.

Relevant staff will receive Prevent training appropriate to their role at the earliest opportunity. Training will enable staff to understand why radicalisation is relevant to the school, recognise potential susceptibility to radicalisation, understand relevant extremist and terrorist ideologies, know how to raise concerns internally and understand the school's Prevent referral arrangements.

The DSL and any other staff with specific Prevent responsibilities will receive more in-depth training on extremist and terrorist ideologies, referrals and the Channel process. Prevent-specific training for those with lead responsibility will normally be refreshed at least every two years, with other staff training reviewed in light of the school's Prevent risk assessment, local context and emerging risks. Training records will be maintained. Current Prevent guidance expressly recommends at least two-yearly updating for DSLs/Prevent leads.

St Benedict's will normally discuss any concerns in relation to possible radicalisation with a child's parents as they are in a key position to spot signs of radicalisation. This will not happen if there is a specific reason to believe that to do so would put the child at risk. Families who raise concerns themselves will be supported. The DSL will consider the individual circumstances before deciding when and how parents should be involved, in accordance with safeguarding and information-sharing principles.

Channel

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

Prevent referrals are initially assessed by the police and may be passed to a multi-agency Channel panel. The panel considers whether the individual is at risk of being drawn into terrorism and what support may be appropriate. A representative of the school may be asked to contribute to the Channel panel.

While a Prevent referral is being assessed, any further or new relevant information which comes to the school's attention will be passed to the police. This is the particular addition made in KCSIE 2026.

Channel support is voluntary and consent is required before support is provided. For a child under 18, the current Channel arrangements require the appropriate parent, guardian or agency responsible for their care to provide consent. St Benedict's will co-operate appropriately with the Channel process and help to put agreed support in place.

Where a child who is receiving support through Channel transfers to another school or college, the DSL will consider what relevant safeguarding information should be shared securely in advance so that appropriate support can be in place when the child arrives. This may include details of the child's engagement with Channel and the outcome of that engagement.

22. Child abduction and community safety incidents and Homelessness

Child abduction, the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child, can be committed by parents or other family members, by people known but not related to the child, such as neighbours, friends or acquaintances, and by strangers. It is one example of the safeguarding concerns which can arise for children outside school.

Other 'community safety incidents' in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. St Benedict's educates its students through its PSHE/RSHE programme about how to keep themselves safe and adapts these lessons to the different ages and levels of independence of students, for example, as they start walking to school on their own. Lessons look to build children's confidence, abilities and practical safety skills rather than simply warning them about all strangers. Any specific concerns about child abduction or community safety will be considered as safeguarding concerns and referred to the DSL or a deputy where appropriate.

KCSIE specifically says that personal-safety education should develop children's confidence and abilities, rather than simply teaching them to fear strangers.

Homelessness and Temporary Accommodation

Another possible issue from outside school that could occur for children is homelessness. Being homeless or at risk of becoming homeless presents a real risk to a child's welfare and can affect children and families from a wide range of circumstances. Indicators that a family may be at risk of homelessness can include household debt, rent arrears, domestic abuse, anti-social behaviour or being asked to leave a property.

The DSL and deputies will be aware of relevant contact details and referral routes into the Local Housing Authority so that concerns can be raised and progressed at the earliest opportunity. Where appropriate, St Benedict's will support families to obtain help before they reach a homelessness crisis. Referral to, or discussion with, the Local Housing Authority does not replace a safeguarding referral to local authority children's social care where a child has been harmed or is at risk of harm.

While homelessness will usually be considered in the context of a child living with their family, particular attention will be given to 16- and 17-year-olds who may be living independently from their parents or carers, for example because they have been excluded from the family home. Local authority children's social care is the lead agency for these children and the DSL or a deputy will ensure that appropriate referrals are made according to the child's circumstances.

KCSIE 2026 also identifies a new temporary accommodation notification duty. Under the Children's Wellbeing and Schools Act, local housing authorities in England are required to notify educational institutions when a child is placed in temporary accommodation, where the necessary consent has been given. Where St Benedict's receives such a notification, the information will be considered promptly by appropriate safeguarding and pastoral staff so that any necessary support can be put in place and the child's welfare and educational outcomes promoted.

A notification that a child has been placed in temporary accommodation does not replace the school's existing safeguarding responsibilities. Where a child has been harmed or is at risk of harm, a referral to local authority children's social care will still be made in accordance with this policy.

Further information on child abduction, community safety and homelessness can be found in Annex A of KCSIE.

23. Whistleblowing

All staff and volunteers should feel able to raise concerns about poor or unsafe practice or potential failures in the school's safeguarding provision and should know that such concerns will be taken seriously by the Senior Leadership Team. Appropriate whistleblowing arrangements are in place to enable concerns to be raised with senior leaders.

Concerns about safeguarding practice within the school should normally be raised with the Head in accordance with the Whistleblowing Policy found in the Staff Employment Manual. Where the concern relates to the Head, staff should follow the alternative reporting route set out in that policy, including referral to the Chair of Governors/proprietor where appropriate.

Safeguarding concerns or allegations about the conduct of an individual adult working in or on behalf of the school should be reported in accordance with the procedures elsewhere in this policy for allegations and low-level concerns, rather than being treated simply as a whistleblowing matter. A concern or allegation about another member of staff which may meet the harm threshold should normally be referred to the Head; where the concern or allegation relates to the Head, it should be referred to the Chair of Governors/proprietor. Concerns which do not meet the harm threshold should be shared in accordance with the school's low-level concerns procedures.

The NSPCC Whistleblowing Advice Line is available as an alternative route for staff who feel unable to raise concerns about child protection failures with the school, or who believe that genuine concerns they have raised are not being addressed appropriately. Staff can call 0800 028 0285. The line is available from 08:00 to 20:00 Monday to Friday and from 09:00 to 18:00 at weekends. Staff can also email help@nspcc.org.uk

Appendix 1: The Role of Designated Safeguarding Leads

St Benedict's has a Designated Safeguarding Lead (DSL) structure, with appropriately trained Deputy Designated Safeguarding Leads, to support staff in carrying out their safeguarding duties and liaising with external services. The DSL is an appropriate senior member of the leadership team with the necessary status and authority to be responsible for matters relating to child protection and welfare throughout the school, including online safety and understanding the filtering and monitoring systems and processes in place. The DSL has ultimate lead responsibility for safeguarding and child protection. This responsibility is explicit in the DSL's job description and cannot be delegated, although individual activities may be delegated to appropriately trained Deputy DSLs.

St Benedict's ensures that the DSL and Deputy DSLs have appropriate status and authority as well as sufficient time, funding, training, resources and support to fulfil their child welfare and safeguarding responsibilities effectively. The DSL and deputies are trained to the same standard. Their formal DSL training is updated at least every two years and their knowledge and skills are refreshed at least annually. Their responsibilities are included in their job descriptions. The DSL's responsibilities include providing advice and support to staff, taking part in strategy discussions and inter-agency meetings, supporting other staff to do so where appropriate and contributing to assessments of children.

During term time the DSL or a Deputy DSL will always be available during school hours for staff in the school to discuss any safeguarding concerns. The school has clear and robust arrangements for periods when the DSL is unavailable because of illness, leave or other circumstances and for appropriate safeguarding cover during out-of-hours and out-of-term activities. Staff will know how to raise a safeguarding concern at all such times. Arrangements include a confidential shared safeguarding mailbox system which is monitored so that concerns are received and acted upon without delay.

The Senior Designated Safeguarding Lead for the school is **Mr Mícheál Foley**, the Deputy Head Pastoral. He has ultimate lead responsibility for safeguarding and child protection in the school and is answerable to the Head. **Mrs Áine Yue** is the Senior Deputy DSL for the Senior School. **Mr Patrick McCarthy** and **Ms Andrea Loaiza-Palacio** are Deputy DSLs for the Senior School. The Designated Safeguarding Lead for Key Stage 2 is **Ms Lana Powell**, Assistant Head of the Junior School. The Designated Safeguarding Lead for Key Stage 1 and Early Years Foundation Stage is **Mrs Moira Edwards**, Head of Pre Preps and Nursery. The Deputy DSL for Key Stage 1 and 2 and Early Years is **Mr Robert Simmons**, Head of the Junior School. The DSLs meet regularly to discuss safeguarding issues across the whole campus and they also have safeguarding supervision to support them in their work.

The school will ensure that the arrangements above identify clearly the named DSL who holds ultimate lead responsibility for safeguarding and child protection for each registered school. Deputy DSLs may undertake the activities of the DSL, but ultimate lead responsibility cannot be delegated.

A number of other members of staff, including Division Heads, have enhanced safeguarding training appropriate to their roles. Enhanced or Level 3 safeguarding training does not, by itself, make a member of staff a Deputy DSL. A person will only undertake the functions of the DSL in the DSL's absence where they have been formally appointed as a Deputy DSL, are trained to the same standard as the DSL and this responsibility is explicit in their role.

If the DSL is unavailable their operational duties will be covered by an appropriately trained Deputy DSL in accordance with the school's safeguarding cover arrangements. Where a safeguarding concern or allegation relates to the DSL personally, it will be dealt with under the procedures for concerns or allegations about adults working with children set out elsewhere in this policy, while safeguarding continuity will be maintained by another appropriately appointed DSL or deputy.

Acting on Safeguarding Issues

- To advise and support staff and act upon all suspicion, belief and evidence of abuse reported to them and to ensure that safeguarding concerns are considered promptly and in the best interests of the child

- To be a first point of contact for parents, pupils, staff and external agencies in matters of child protection and safeguarding and to act as a point of contact with the safeguarding partners
- To ensure that appropriate action is taken in the school and that procedures are followed in all actual or suspected cases of child abuse. To make referrals of suspected abuse and neglect to local authority children's social care as required and to support staff who make such referrals. Where a child has been harmed, is at risk of harm or is in immediate danger, the appropriate referral will be made without delay. Where a concern relates to the conduct of an adult working with children, the DSL will liaise as required with the case manager and the LADO. The DSL will continue to liaise with external agencies involved in supporting the child and family and engage with community-based early help and Family Help in accordance with current local arrangements. KCSIE expressly identifies referral to children's social care, Channel, DBS and the police among the DSL's referral functions
- To understand the assessment processes for Family Help and statutory intervention, including local thresholds, referral arrangements and the circumstances in which a child may be in need or suffering, or likely to suffer, harm (see Flowchart 1) and the Ealing Thresholds of Need Guide
- To understand and support the school in meeting the Prevent duty, to advise staff on protecting children from the risk of radicalisation and to make or support Prevent referrals in accordance with current local procedures. Where a referral progresses to Channel, the DSL will support the Channel process as appropriate
- To keep the Head informed of safeguarding issues as appropriate, particularly ongoing enquiries under section 47 of the Children Act 1989 and police investigations. Where the Head is the subject of a safeguarding concern or allegation, the procedures set out elsewhere in this policy for concerns about the Head will be followed
- To understand the risks associated with online safety and the additional risks faced by children with SEND and other vulnerabilities online, for example from online bullying, grooming or radicalisation. The DSL will have up-to-date knowledge and capability in relation to online safety, including a clear understanding of the filtering and monitoring systems and processes in place at St Benedict's
- To liaise with other agencies such as the police, including being aware of the requirement for children to have an Appropriate Adult where required under PACE Code C. The DSL will liaise with the LADO where appropriate, co-ordinate safeguarding procedures and maintain a working knowledge of the Local Authority's safeguarding procedures and the school's Child Protection and Safeguarding Policy and procedures
- To understand and apply the procedures in Part Five of KCSIE for child-on-child sexual harassment, harmful sexual behaviour and sexual violence, including undertaking or overseeing appropriate risk and needs assessments and considering whether a concern should be managed internally, supported through early help or Family Help, referred to children's social care and/or reported to the police
- To deal with issues arising from, or relating to, historical allegations

Longer-term Support and Training

- To undergo training in safeguarding to be updated every two years, with refresher training and updating of knowledge and skills at least annually through, for instance, meeting other DSLs or taking time to read about safeguarding developments, and also to undertake appropriate Prevent awareness training.
- Training and professional development for the DSL and deputies will ensure that they understand how to identify, understand and respond to particular needs which can increase children's vulnerability and to specific harms which place children at risk. This includes understanding the impact of adversity and trauma, the needs of children in need, children with SEND, children with relevant health conditions and young carers, and the respective processes and responsibilities of other agencies
- To work with the Head, Governing Body and other relevant leaders to ensure that all staff receive appropriate safeguarding and child protection training and updates and that every member of staff has access to and understands the school's Child Protection and Safeguarding Policy and Part One of KCSIE, as well as regular reviews of their own practice and opportunities to discuss concerns about safeguarding matters
- This includes making sure staff are aware of the importance of information sharing, as well as training opportunities outside the school and local safeguarding policies. It is good practice for other members of staff to contribute to this training where appropriate. Staff will understand how concerns should be

reported internally, how urgent safeguarding action can be taken where the DSL is unavailable, and the circumstances in which referrals may be made directly to local authority children's social care or the police. Appropriate Prevent training will be provided according to staff members' roles and responsibilities

- To support staff during referral processes and to help staff understand how safeguarding, welfare and educational outcomes are linked, including when considering appropriate academic and pastoral support for individual children
- To encourage a culture of listening to children and taking their wishes and feelings into account among staff in any measures the school might put in place. The DSL will also understand the difficulties that children may have approaching staff with problems and will consider how to develop trusted relationships which facilitate communication
- To promote supportive engagement with parents and carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances. Parents will be made aware of the school's safeguarding role and that referrals about suspected abuse or neglect may be made where appropriate. Also to ensure the Child Protection and Safeguarding Policy is always available on the school website
- To liaise with the Senior Mental Health Lead where safeguarding concerns are linked to mental health and, where available and appropriate, with relevant Mental Health Support Team services
- Where appropriate, to take part in child protection conferences or reviews. If the DSL cannot attend, they will ensure that another appropriately trained member of staff responsible for Pupil Welfare and Safeguarding will attend. More broadly, to work closely with local authority children's social care, safeguarding partners and other external agencies and to understand the importance of providing them with timely information and support in order to safeguard and promote the welfare of children
- Together with the Head and School Leadership Team, annually to review the school's Policy on Child Protection and Safeguarding and regularly review its procedures and implementation, and to report on this to the Governing Body, which formally approves the policy each year. A report will be given termly to the Governors' Safeguarding Committee and the reports will be viewed by all governors annually as part of the safeguarding training for governors. Any deficiencies or weaknesses regarding child protection arrangements will be remedied without delay.
- In addition, to work with the Head and other relevant strategic leads in taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the long-term impact this might have on attendance, engagement and achievement. In particular, to ensure that the school knows which children have or have had a social worker, understands their progress and attainment and maintains high aspirations for these children. The DSL will support teaching staff, on an appropriate need-to-know basis, to provide additional academic support and/or reasonable adjustments to help them reach their potential even after they no longer have a social worker

Information Sharing and Managing Child Protection Files

The DSL is responsible for ensuring that appropriate arrangements are in place so that safeguarding information is transferred, reviewed and acted upon promptly at all transition points, including in-year transfers. Where a child leaves the school, their child protection file will be transferred to the new school or college as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term.

The child protection file will be transferred separately from the main pupil file, secure transit will be ensured and confirmation of receipt obtained. The information transferred will include a clear, structured summary identifying current safeguarding concerns, relevant context and ongoing support needs. Particular care will be taken to distinguish current safeguarding concerns from historic information and to provide appropriate context for previous concerns.

The receiving school should be able to understand the child's current risks and needs rather than simply receive a collection of unstructured historic records. Where appropriate, the DSL will have a direct conversation with the DSL at the receiving school or college to ensure significant information is actively considered and acted upon.

In addition to transferring the child protection file, the DSL will consider whether information should be shared with the new school in advance, particularly where this will assist in assessing risk to the child or others and putting appropriate support in place. This may include information concerning children who have had a social worker or experienced abuse, serious violence or harmful behaviour, or who are receiving support through Channel. Safeguarding information must be used to support, and not disadvantage, the child.

To refer cases to the Disclosure and Barring Service as required where a person is dismissed or removed from regulated activity, or would have been removed had they not left, where the statutory referral criteria are met.

To ensure that child protection records are kept up to date and that detailed, accurate and secure written records are maintained in relation to child protection.

To promote the use of MyConcern as the central online database for safeguarding records and train staff in its use in line with applicable data protection law, including the UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.

This ensures that Pupil Welfare and safeguarding issues are managed centrally while allowing only the relevant staff to contribute efficiently and effectively. Safeguarding information will be kept confidential, stored securely and accessed only by those who need to see it.

Records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of action taken, decisions reached and the outcome, including instances where referrals were or were not made to another agency and the rationale for those decisions. Records will be clear and factual and will distinguish between observed concerns, professional opinion and historic information.

The DSL and deputies will understand the importance of information sharing within the school, with other schools and colleges at transfer, and with safeguarding partners, agencies, organisations and practitioners. They will understand relevant data protection law and recognise that appropriate information sharing is an essential part of protecting children.

Appendix 2: Safer Recruitment

St Benedict's has a culture of safe recruitment and makes its decisions about the suitability of employees and volunteers based on the checks and evidence set out in Part Three of KCSIE, which provides the legal requirements and good practice relating to safer recruitment, together with the Education (Independent School Standards) Regulations 2014 and other relevant legislation.

1) Recruitment and Selection

The governors create a strong safeguarding culture at St Benedict's with robust recruitment procedures designed to deter and prevent unsuitable people from applying to, or being employed or engaged by, St Benedict's.

Those involved in the recruitment and employment of staff to work with children will receive appropriate safer recruitment training covering, as a minimum, Part Three of KCSIE. As a matter of school policy, every recruitment panel will include at least one person who has undertaken appropriate safer recruitment training. KCSIE expects those involved in recruitment to receive appropriate training, although the specific statutory requirement that *one interviewer* has undertaken such training applies to maintained schools and PRUs rather than independent schools.

Adverts for positions at St Benedict's include the safeguarding requirements of the role as well as the school's commitment to safeguarding and promoting the welfare of children, making clear that appropriate safeguarding checks will be undertaken. They also state whether the post is exempt from the Rehabilitation of Offenders Act 1974 and relevant amendments to the Exceptions Order.

As part of its shortlisting process, the school will consider carrying out an online search using a search engine on shortlisted candidates as part of its due diligence. The purpose is to identify publicly available incidents or issues which the school may wish to explore with the candidate at interview. Shortlisted candidates will be informed that such searches may be undertaken.

Application forms for roles in regulated activity will make clear where the role involves regulated activity with children. From 1 September 2026, the previous 'supervision exemption' no longer applies. Regulated activity includes paid or unpaid work involving teaching, training, instructing, caring for or supervising children, providing certain advice or guidance concerning their wellbeing, or driving a vehicle solely for children, where the frequency requirements are met. Work in a specified place such as a school which gives an opportunity for contact with children may also be regulated activity where the frequency requirements are met. Relevant personal care and healthcare are regulated activity regardless of frequency.

For these purposes, the frequency condition includes activity undertaken frequently, on more than three days in any 30-day period or overnight in the circumstances defined by the legislation.

Where a role involves regulated activity, the information provided to applicants will include a statement that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

Application forms will also include, or provide a link to, the school's Child Protection and Safeguarding Policy and policy on the recruitment of ex-offenders. A CV may be accepted only alongside a completed application form and will not be accepted as a substitute for it.

Applicants must provide:

- personal details, current and former names, current address and National Insurance number
- details of their present or last employment and reason for leaving
- a full history since leaving school, including education, employment and voluntary work, with explanations for gaps
- qualifications, awarding bodies and dates of award
- details of referees

- a statement explaining the personal qualities and experience which they consider relevant to the post and how they meet the person specification; and
- a declaration confirming that the information they have provided is true

KCSIE's required recruitment information is now usefully set out in one place at paragraphs 292–295.

Open references will not be accepted, and applicants should not obtain references themselves. References will be obtained before interview where possible so that concerns can be explored with both the referee and candidate. References should normally be from the candidate's current employer and completed by a senior person with appropriate authority. Where a referee is school- or college-based, the Headteacher or Principal should confirm that the reference is accurate in relation to disciplinary investigations.

The school will obtain verification of the individual's most recent relevant employment where they are not currently employed and will obtain a reference from the relevant employer from the last time they worked with children where they are not currently doing so. Where the applicant has never worked with children, a reference will be sought from their current employer.

All references will be verified with the person who provided them. Electronic references will be checked to ensure that they originate from a legitimate source. Referees will be contacted where information is vague or insufficient and the application form will be compared with the references so that discrepancies can be explored. The school will establish the reason for leaving the candidate's current or most recent employment and ensure that concerns are satisfactorily resolved before an appointment is confirmed.

When St Benedict's provides a reference about a former or current employee, it will provide factual information about any substantiated safeguarding concerns or allegations meeting the harm threshold. It will not include concerns or allegations which are unsubstantiated, unfounded, false or malicious, in accordance with KCSIE.

At least two people will carry out shortlisting. They will explore inconsistencies, gaps in employment and other potential concerns.

Shortlisted candidates will be asked to complete a self-declaration of criminal record or other information which may make them unsuitable to work with children. This information will only be requested after shortlisting and will not be used as part of the initial shortlisting process. The declaration may include information concerning relevant criminal history, barring, prohibition from teaching or management of an independent school, childcare disqualification and relevant overseas information.

Interviews will explore the candidate's motivation for working with children, relevant experience and skills, gaps in employment and any frequent changes of employment or location. Potential areas requiring further exploration may include indicators of negative safeguarding behaviours, any implication that adults and children are equal, a lack of recognition of children's vulnerability, inappropriate idealisation of children or an inadequate understanding of appropriate boundaries.

Pupils should, where appropriate, be involved in the recruitment process in a meaningful and properly supervised way. This may include observing shortlisted candidates interacting with pupils.

Any information about past disciplinary action or substantiated allegations will be considered in the circumstances of the individual case. All information considered in decision-making, and the decisions reached, will be clearly recorded.

2) Pre-appointment Checks

All offers of appointment will be conditional upon satisfactory completion of the appropriate pre-appointment checks.

The school will:

- verify the candidate's identity, including being alert to previous changes of name
- obtain an enhanced DBS certificate and, where the person will engage in regulated activity, children's barred list information
- obtain a separate children's barred list check where a person is permitted to begin regulated activity before the enhanced DBS certificate is available and all the other necessary checks have been completed. This route is not available in relation to the school's EYFS provision. Where an individual will be working within a setting covered by the EYFS framework, they must not begin working in that setting until the school has received their enhanced DBS certificate including children's barred list information. This applies to staff and volunteers alike
- verify the candidate's mental and physical fitness to carry out the responsibilities of the role in accordance with the Equality Act 2010
- verify the individual's right to work in the UK
- where the individual has lived or worked outside the UK, undertake any further checks considered appropriate so that relevant events outside the UK can be considered
- verify professional qualifications where appropriate
- ensure that anyone appointed to carry out teaching work is not subject to a prohibition order, interim prohibition order or any relevant historic GTCE sanction or restriction
- undertake a section 128 check for anyone taking up a management position in the independent school; and
- where relevant childcare is provided, undertake the checks required by the Childcare Disqualification Regulations 2018

The DfE's *Check a teacher's record* service will be used where appropriate to check prohibition, directions, sanctions and restrictions and to verify QTS and completion of teacher induction or probation. This replaces the old Employer Access Service terminology in KCSIE 2026.

Where an individual has lived or worked outside the UK, the same checks will be undertaken as for other staff, including an enhanced DBS check where required, even if the individual has never previously lived in the UK. Additional checks may include overseas criminal-record information or information from the relevant professional regulatory authority. Where satisfactory overseas information cannot be obtained, the school will seek alternative evidence and/or undertake a documented risk assessment before deciding whether to proceed.

Where a DBS certificate is required, the applicant must show the original certificate to the school before taking up the post or as soon as practicable afterwards. Any disclosure will be considered fairly and individually, taking account of its seriousness and relevance, when it occurred, whether it was an isolated incident or part of a pattern, its circumstances and the applicant's explanation and acceptance of responsibility.

Volunteers

The checks required for a volunteer depend upon whether the activity amounts to regulated activity. From 1 September 2026, a volunteer who teaches, trains, instructs or supervises children frequently, on more than three days in a 30-day period or overnight is in regulated activity. Such volunteers will therefore have an enhanced DBS check with children's barred list information.

This is a significant change introduced by the Crime and Policing Act 2026. The former exemption under which supervised volunteers carrying out these activities might fall outside regulated activity has been removed.

For any existing St Benedict's volunteer who becomes engaged in regulated activity from 1 September 2026 as a result of this change, the school will check their children's barred list status, normally through an enhanced DBS check with barred list information or, where KCSIE permits, a standalone barred list check.

A volunteer on whom no checks have been undertaken will never be left unsupervised or allowed to undertake regulated activity. Where a volunteer does not undertake regulated activity, the school will undertake and record a written risk assessment to determine what checks are appropriate. This will take account of the nature of the work, what is known about the volunteer, other employment or voluntary work from which suitability information

may be obtained, and whether an enhanced DBS check without barred list information or another appropriate DBS check is justified.

DBS Update Service

Where the DBS Update Service is used, the school will obtain the individual's consent, establish that the certificate belongs to the individual, examine the original certificate, ensure it relates to the children's workforce and confirm that the level of check is appropriate to the role. Individuals can join the Update Service when applying for a new DBS check or within 30 calendar days of the certificate being issued.

Agency and Third-party Staff

When using staff from an agency or third-party organisation, St Benedict's will obtain written confirmation that the agency or organisation has undertaken the same checks which the school would otherwise be required to undertake on that individual. This includes confirmation that the appropriate enhanced DBS certificate has been obtained and, where the role is regulated activity, that the required children's barred list information has been obtained before appointment.

Where an enhanced DBS certificate obtained by the agency has disclosed information, St Benedict's must obtain a copy of the certificate from the agency. St Benedict's will also check that the person presenting for work is the person on whom the checks were undertaken.

Contractors and Self-employed Workers

Where using contractors, St Benedict's will set out safeguarding requirements in the contract between the organisation and the school.

A contractor or employee of a contractor engaging in regulated activity will require an enhanced DBS check with children's barred list information. A contractor who is not undertaking regulated activity but whose work gives them the opportunity for regular contact with children will require an enhanced DBS check without barred list information. Where there is no opportunity for regular contact, the school will consider whether a basic DBS check is appropriate.

No contractor on whom appropriate checks have not been obtained will be permitted to work unsupervised or to undertake regulated activity.

Where an individual working at the school is self-employed, St Benedict's will either obtain the appropriate DBS check itself or, where the self-employed person has obtained their own eligible DBS check, inspect the certificate and satisfy itself that the check is at the level required for the work being undertaken. This is specifically clarified in KCSIE 2026.

Trainee Teachers

Trainee teachers salaried directly by St Benedict's will be checked in the same way as other employees, including an enhanced DBS check with children's barred list information.

Where trainee teachers are fee-funded, the checks are the responsibility of the initial teacher training provider. St Benedict's will obtain written confirmation that the provider has carried out all the pre-appointment checks which the school would otherwise have been required to undertake and that the trainee has been judged suitable to work with children. Fee-funded trainee teachers do not have to be recorded on the school's SCR, although the school may choose to do so.

If a member of staff is exceptionally permitted to begin regulated activity before their DBS certificate is available, they will be appropriately supervised and all other checks will have been satisfactorily completed, including a separate children's barred list check. This exception does not apply to the school's EYFS provision, where no

individual may begin working until the enhanced DBS certificate including children's barred list information has been received.

In KCSIE, there is specific guidance that if anyone working in school, including supply teachers, trainee teachers, contractors or volunteers, has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children', this should be considered in relation to their suitability to work with children. This might include incidents outside school not involving a child, for instance domestic abuse. The school will consider the circumstances and whether the behaviour indicates a transferable risk to children or raises wider questions about the individual's suitability to work with them.

3) Recording Information

St Benedict's follows the relevant regulations in maintaining a Single Central Record (SCR) of pre-appointment checks. This covers all staff, including salaried trainee teachers, agency and third-party supply staff even where they work for only one day, and all members of the proprietor body as required for an independent school.

The SCR will indicate whether the following checks have been carried out or certificates obtained, together with the date of the check or certificate as required:

- identity check
- standalone children's barred list check where one has been undertaken
- enhanced DBS check and, where appropriate, children's barred list information
- prohibition from teaching check
- further checks on those who have lived or worked outside the UK
- professional qualifications where required
- right to work in the UK; and
- for relevant individuals in management positions at St Benedict's, a section 128 check

The requirement in KCSIE to record whether a position involves 'relevant activity' applies to colleges and should therefore not appear as a mandatory SCR field for St Benedict's as an independent school.

For agency and third-party supply staff, the SCR will record whether written confirmation has been received that the supplying organisation has carried out the relevant checks and obtained the appropriate certificates, the date that confirmation was received and whether details of an enhanced DBS certificate have been provided. For an independent school, the date on which any required certificate was obtained should also be recorded.

The school may also record additional information where useful, including checks undertaken on volunteers and governors, dates of safer recruitment or safeguarding training and the identity of the person who completed a check.

The details of an individual are removed from the SCR once they no longer work at the school.

Copies of documents used to verify identity, right to work and required qualifications will be retained on the personnel file in accordance with applicable requirements. The school is not required to retain a copy of a DBS certificate in order to meet its SCR obligations. Where a copy of a DBS certificate or other criminal-record information is retained, there must be a valid reason for doing so and it will not normally be kept for longer than six months. The school may retain a record that the check was undertaken, the outcome and the recruitment decision.

4) Existing Staff and Volunteers

In limited circumstances St Benedict's needs to carry out new checks on existing staff or volunteers:

- where an individual moves from work which was not regulated activity into work, which is regulated activity, in which case the relevant checks for regulated activity will be undertaken

- where there has been a break in service of 12 weeks or more; or
- where there are concerns about an individual's suitability to work with children

This includes volunteers whose activities become regulated activity as a result of the changes taking effect from 1 September 2026.

Safer recruitment does not end once somebody is appointed. St Benedict's maintains a culture of continuing safeguarding vigilance, in which inappropriate behaviour is challenged, and staff are encouraged to raise concerns, including where conduct outside work or online may have implications for the safeguarding of children.

5) Referrals Following Employment

Where St Benedict's removes a person from regulated activity, or would have removed them had they not resigned or ceased volunteering, the school will make a referral to the Disclosure and Barring Service where the statutory criteria are met. This duty applies to both paid staff and volunteers undertaking regulated activity. A referral should be made as soon as possible and may arise where an individual has been dismissed, suspended, redeployed away from regulated activity, resigned or ceased volunteering.

Where the school dismisses or ceases to use the services of a teacher because of serious misconduct, or would have done so had the teacher not left, it will also consider whether a referral to the Teaching Regulation Agency is required.

Appendix 2b: Childcare Disqualification

Childcare disqualification is an additional safeguarding requirement which applies to particular staff working in relevant childcare provision. It is separate from the DBS regime.

The Childcare Disqualification Regulations 2018 apply principally to staff providing early years childcare for children up to and including Reception age, and to staff providing childcare outside normal school hours for children above Reception age who have not yet attained the age of eight, for example in relevant breakfast or after-school provision. They also apply to those directly concerned in the management of such provision. They do not automatically apply to every member of staff simply because the school educates children under eight. KCSIE expressly directs schools to apply the 2018 Regulations to the relevant childcare provision.

A person who is disqualified must not provide relevant childcare or be directly concerned in its management unless an appropriate waiver has been granted.

The grounds for disqualification include:

- inclusion on the Children's Barred List
- certain violent and sexual criminal offences involving children or adults
- certain orders made in relation to the care of children
- specified refusal or cancellation of registration relating to childcare or children's homes
- disqualification from private fostering; and
- certain equivalent offences committed overseas

Disqualification by association does not apply to staff working in a non-domestic school setting. Since the Childcare Disqualification Regulations 2018 came into force, schools must not seek information about the cautions, convictions or other disqualification circumstances of people living in a member of staff's household for this purpose. Disqualification by association now applies only to relevant childcare provided in domestic settings.

St Benedict's will identify which posts fall within the childcare-disqualification arrangements and will ensure that appropriate checks and declarations are completed for those staff. The school will keep a record of staff employed to work in, or directly manage, relevant childcare provision and of the date on which the required disqualification information was obtained.

After making the appropriate declaration, staff within the scope of the Regulations will be under an ongoing duty to inform the school if their circumstances change in a way which may affect their ability lawfully to undertake relevant childcare. Failure to provide relevant information as required will be considered under the school's disciplinary procedures, taking account of the circumstances of the individual case.

Appendix 3: Online Safety and Cybercrime

Children and young people can be exploited and suffer bullying through their use of modern technology such as mobile phones, online platforms, games, messaging services, generative AI applications and social networking sites. Technology can also provide the platform to facilitate harm such as child sexual exploitation, radicalisation, sexual predation, child-on-child abuse, harmful sexual behaviour and the making or sharing of nudes and semi-nudes.

For the purposes of KCSIE, images include photographs, videos and livestreams and may be taken by the child, created by another person, digitally altered or wholly generated using artificial intelligence, including so-called deepfakes or 'deep nudes'. All incidents involving the making or sharing of nudes or semi-nudes require an appropriate safeguarding response.

Where necessary, the school will follow the DfE's [Searching, Screening and Confiscation Advice](#). Further advice on responding to these incidents can be found in the UKCIS guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

The breadth of issues classified within online safety is considerable and continually evolving, but KCSIE categorises them into four areas of risk:

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

These are the updated KCSIE 2026 definitions. In particular, AI-generated interaction is now expressly a Contact risk and AI-generated explicit imagery a Conduct risk.

Online safety is treated as a running and interrelated theme throughout the school's safeguarding arrangements rather than as a separate issue. It is considered in relevant policies, curriculum planning, staff training, the work of the DSL and Deputy DSLs and engagement with parents and carers.

Filtering and Monitoring

In order to minimise the risks to our children and young people, the school has appropriate filtering and monitoring systems designed to limit children's exposure through the school's IT systems to harmful and inappropriate online material and to identify safeguarding concerns requiring intervention.

St Benedict's uses filtering to block inappropriate material and monitoring systems which can identify potentially concerning online activity. Where monitoring systems generate a safeguarding alert, this is reviewed and escalated appropriately and, where necessary, followed up by the safeguarding or pastoral team.

The school is always careful that "overblocking" does not lead to unreasonable restrictions on what children can be taught with regard to online teaching and safeguarding, and the blocking of particular sites and categories is kept under review. KCSIE expressly warns against filtering arrangements which unreasonably restrict legitimate teaching and safeguarding education.

The school identifies and assigns clear roles and responsibilities for the management of filtering and monitoring. The SLT member with responsibility for filtering and monitoring is supported by the Senior DSL and the Director of ICT.

“Smoothwall Filtering and Firewall” limits internet traffic based on categories and blacklists. “Smoothwall Monitor” tracks pupils’ activities on devices on which the software is installed and uses image and key logging to identify at-risk behaviour or actions. There is monitoring of chats on Teams through the ‘Senso’ system.

The effectiveness of the school’s filtering and monitoring arrangements is formally reviewed at least once every academic year by the SLT member responsible for filtering and monitoring, supported by the DSL and IT staff. The review includes checks that filtering operates appropriately on all internet-connected devices in all relevant locations within the school. A record of these checks and the annual review is maintained.

The review also considers whether senior leaders and relevant staff understand the systems in place, are able to manage them effectively and know how concerns should be escalated. It takes account of the age and number of pupils, those who may be at greater risk of harm, how pupils access the IT system, the school’s Prevent risk assessment and the proportionality of safeguarding risks and costs.

The school has regard to the DfE [Filtering and monitoring standards for schools and colleges](#), which require schools to:

- identify and assign roles and responsibilities for filtering and monitoring
- review filtering and monitoring provision at least annually
- block harmful and inappropriate content without unreasonably affecting teaching and learning; and
- have effective monitoring strategies which meet the school’s safeguarding needs

This annual review is also taken to governors for oversight at the Michaelmas term governors’ Safeguarding Committee, which reports to the full governing body. Governors will consider the DfE standards and, where appropriate, discuss with school leaders, IT staff and service providers whether further action is required.

The school will also use, where useful, the DfE’s free [Plan technology for your school](#) service to self-assess against relevant digital and filtering and monitoring standards and identify areas for development. KCSIE now specifically signposts this service.

Most monitoring or filtering concerns which arise on school computers or computers brought into school and connected to the school Wi-Fi are automatically logged on MyConcern or, where the system does not integrate directly with MyConcern, are recorded manually where they constitute a pastoral or safeguarding concern. They are then dealt with by the appropriate safeguarding and/or pastoral staff, with outcomes recorded on MyConcern.

Parents in Years 7–10 who wish can sign up laptops bought through the school to have monitoring and filtering which can also provide safeguarding alerts relating to use at home. Parents are provided with appropriate information about the filtering and monitoring arrangements which apply to their children.

MyConcern is reviewed termly as part of the Governors’ Safeguarding Committee, providing another opportunity for governor oversight of patterns and trends arising from monitoring and filtering concerns.

Information Security and Cyber Security

The school recognises that information security and cyber security are also part of its wider safeguarding responsibilities. Appropriate systems and procedures are maintained to protect personal information, reduce the risk of disruption and data breaches and mitigate the safeguarding risks which can result from a cyber incident. The school has regard to the DfE’s [Cyber security standards for schools and colleges](#) and guidance from the [National Cyber Security Centre](#).

There is training for staff, including simulated phishing exercises where appropriate, to help raise awareness about cyber security.

[Cyber security training for school staff – NCSC](#)

Mobile Phones

As part of our limiting of inappropriate use of technology, St Benedict's is a mobile-phone-free school by default during the school day. Access to mobile phones or smart wearables during the school day is not allowed, and phones that are brought into school should be turned off and left in lockers. Any usage that is permitted is only by exception because of a clear educational, medical, safeguarding, or pastoral justification. Further details can be found in Section 12 of the school's Behaviour Policy.

Junior School

In the Junior School, Form 2 (Year 6) pupils who bring a mobile phone to school must hand the device in at the Office on arrival and collect it at the end of the school day. Other students are not allowed a phone at all.

Senior School

Students may bring a mobile phone to school solely to enable safe travel to and from school. During the school day, mobile phones must be switched off and not visible at any time. Phones must not be used between 8.35am and 4.10pm.

Students in Third Form and Lower Four are expected to use non-smart "brick" phones if they bring a phone to school. Students in Upper Four, Lower Five and Upper Five who wish to bring a smartphone must have the Blackout app installed and active.

At no point during the school day may students use mobile phones to listen to music, contact friends or family, or access social media. Any necessary communication with home during the school day must take place via the school office.

Sixth Form

Sixth Form students may use mobile phones only in designated Sixth Form spaces, such as the Sixth Form Centre and Sixth Form Café. Sixth Form students should not use mobile phones in front of younger pupils.

Whole-School Approach

We have a whole-school approach to online safety so that we can do our best to keep children safe online both in school and at home. We ensure that staff are aware of how not to compromise their position of trust in or outside the setting and are aware of the dangers associated with social networking sites and other forms of online communication.

All staff receive online safety training as part of their safeguarding and child protection training at induction. This includes understanding their responsibilities in relation to filtering and monitoring. Staff also receive online safety updates as required and at least annually.

Given the rapid evolution of technologies, there is an annual review of our approach to online safeguarding, supported by an updated risk assessment which reflects the particular online risks faced by the school's pupils.

Artificial Intelligence

Generative artificial intelligence is now expressly recognised within KCSIE as part of the online safeguarding landscape. KCSIE identifies both interactions with generative AI applications which simulate human contact and the making, sending or receiving of explicit AI-generated imagery as potential online risks.

The Department for Education has published [Generative AI: Product Safety Expectations](#) and wider guidance on generative AI in education. The guidance explains how existing safeguarding, filtering and monitoring, data protection and other responsibilities apply when generative AI is used by staff or pupils.

We recognise that while AI offers new opportunities to enhance learning and improve efficiency, it also presents potential safeguarding risks if not introduced with care. These risks include exposure to inappropriate or biased content, misinformation, AI-generated or manipulated sexual imagery, simulated relationships or interactions, data privacy breaches, and the potential for students to rely on AI systems in ways which may affect their emotional wellbeing, safety or academic integrity.

AI services may behave differently from conventional websites and search engines and may generate new material dynamically. The school will therefore consider whether its filtering and monitoring arrangements remain effective as AI tools and their capabilities change.

As with any new technology, the safeguarding of pupils remains paramount. We are committed to ensuring that any use of AI within the school is introduced thoughtfully and with full consideration of its potential risks and ethical implications. This includes robust staff training, age-appropriate digital literacy education for pupils and a cautious approach to approving AI tools for use.

School-approved AI tools will be considered in the context of safeguarding, age appropriateness, privacy and data protection, intellectual property, security and the educational purpose for which they are intended. Pupils will be taught that outputs generated by AI may be inaccurate, misleading, biased or inappropriate and should not automatically be treated as reliable or authoritative.

We will ensure that filtering and monitoring systems are reviewed and adapted as necessary to reflect emerging AI capabilities. Staff will also be supported to understand and mitigate risks relating to safeguarding, ethics, data protection and intellectual property when using AI. KCSIE 2026 specifically signposts DfE resources covering these areas.

Further detail on our approach can be found in our separate AI Policy, which outlines how generative AI is being incorporated into school life in a way that supports our educational mission while upholding high standards of safeguarding and pastoral care.

Education and Engagement with Parents

Children are taught about safeguarding, including online safeguarding, through teaching and learning opportunities as part of our broad and balanced curriculum. There is particular focus on this in our PSHE **and RSHE** curriculum.

Online education is age and developmentally appropriate and takes account of the needs of pupils with SEND and other vulnerabilities. It includes, where appropriate, image sharing, deepfakes, pornography, misogynistic online influencers, healthy relationships and understanding when and where to seek help.

From time to time, the school also organises Parents' Forums and information resources for parents regarding online safety. Online safety tips are included in the weekly Newsletter sent to parents. Communication with parents is also used to explain the school's filtering and monitoring arrangements and to reinforce the importance of children remaining safe online at home as well as in school.

We expect all pupils to adhere to the safe use of the internet as detailed in our Online Safety and Anti-Bullying Policies.

Information and Support

[The National Crime Agency's CEOP Education Programme](#) provides resources to protect children and young people from online child sexual abuse through education.

Further useful sources include:

- [DfE Teaching online safety in schools](#)
- [UK Council for Internet Safety](#)
- [UK Safer Internet Centre](#)
- [Internet Matters](#)
- [PSHE Association](#)
- [Educate Against Hate](#)
- [National Cyber Security Centre](#); and
- [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet and is another possible safeguarding issue, as children with particular skills and interests in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

It is broadly categorised as either 'cyber-enabled', crimes which can happen offline but are enabled at scale and speed online, or 'cyber-dependent', crimes which can only be committed using a computer.

KCSIE 2026 highlights cyber-dependent crime as one of the most significant and rapidly evolving threats within the UK crime landscape and notes that offences under the Computer Misuse Act 1990 have risen substantially. Children and young people may experiment with illegal online activity without appreciating its legal or ethical implications. Such offending can extend well beyond financial loss and can cause serious disruption, including to national infrastructure.

Cyber-dependent crimes include:

- unauthorised access to computers, illegal 'hacking', for example accessing a school computer network to look for examination or test answers or alter grades
- denial of service, DoS or DDoS, attacks or 'booting', which seek to make a computer, network or website unavailable by overwhelming it with internet traffic; and
- making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets or Remote Access Trojans with the intention of committing further offences

These activities may constitute offences under the Computer Misuse Act 1990. Staff should not assume that technically able pupils necessarily understand where legitimate experimentation ends and unlawful activity begins. Where concerns arise, the response should seek both to safeguard the child and to divert their skills towards lawful and positive activity.

If there are concerns about a child in this area, the DSL or a deputy should consider referring the child into the Cyber Choices programme, a nationwide preventative police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing.

Cyber Choices aims to intervene where young people are at risk of committing, or being drawn into, lower-level cyber-dependent offending and to redirect their technical abilities towards positive uses.

Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing illegal drugs online and child sexual abuse and exploitation, nor other concerns such as online bullying or general online safety.

Additional advice can be found through [Cyber Choices](#), the NPCC guidance [*When to call the police*](#), and the [National Cyber Security Centre](#).

Appendix 4: Attendance and the Admissions Register (children missing education) and Elective Home Education

For school policy regarding attendance and children who are absent from education, please refer to the School Attendance Policy and the Department for Education's statutory guidance, [Working together to improve school attendance](#). St Benedict's also has regard to the statutory guidance [Children Missing Education](#).

St Benedict's recognises that promoting good attendance is an integral part of the school's culture and safeguarding arrangements. Attendance concerns are considered not simply as an administrative matter but in the context of a child's welfare, educational outcomes and any barriers affecting their engagement with education.

The current [Working together to improve school attendance](#) guidance is statutory for independent schools and was most recently updated in July 2026.

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Effective information sharing between the school and parents and, where appropriate, other schools, the local authority and safeguarding agencies is important in helping to ensure that children are safe and receiving suitable education.

Children being absent from education for prolonged periods and/or on repeated occasions can be a vital warning sign of safeguarding concerns. These may include neglect, child sexual exploitation, child criminal exploitation, including county lines, mental health concerns, substance misuse, risk of travelling to conflict zones, FGM, honour or faith-based abuse or forced marriage. Early intervention is important both in identifying any underlying safeguarding risk and in reducing the possibility that an absent pupil subsequently becomes a Child Missing Education.

For these purposes, a Child Missing Education (CME) has a more specific meaning: a child of compulsory school age who is not registered at a school and is not receiving suitable education otherwise than at school. A pupil who remains registered at St Benedict's but is persistently or severely absent is not technically a CME, although their absence may present significant educational and safeguarding concerns. Current statutory CME guidance makes this distinction explicit.

Attendance is therefore discussed as a standing item in weekly pastoral meetings between the Deputy Head Pastoral and Division Heads and in termly governor safeguarding subcommittee meetings and is part of the DSL's responsibility including evaluation of attendance and plans for improvement where there are relevant safeguarding implications. The DSL will work with those responsible for attendance and pastoral care to identify patterns of absence which may indicate safeguarding concerns, particularly where children are already known to children's social care or have other vulnerabilities.

The DSL does not hold *sole* operational responsibility for school attendance (Working Together to Improve School Attendance states "It cannot solely be the preserve of a single member of staff, or organisation, it must be a concerted effort across all teaching and non-teaching staff in school, the trust or governing body, the local authority, and other local partners"), but should understand and use attendance information when considering the overall safeguarding picture for individual children. KCSIE expects safeguarding information about children with social workers to inform decisions about unauthorised absence and children missing education.

Similarly, a child being absent for prolonged periods or repeatedly can act as a warning sign for safeguarding issues, so we follow up any such issues thoroughly. Where absence indicates a safeguarding concern, St Benedict's will follow its safeguarding procedures and work with Ealing local authority children's services and/or make a referral to children's social care where appropriate. Attendance concerns which do not themselves meet a safeguarding threshold will be addressed through the procedures set out in the School Attendance Policy and current attendance guidance. KCSIE specifically refers schools to [Working together to improve school attendance](#) for the circumstances in which schools must work with local authority children's services.

As found in the school's Attendance Policy, there is a rigorous procedure to check and deal with unauthorised absence and for dealing with children whose whereabouts or educational provision are uncertain, particularly on repeat occasions.

All staff should be familiar with the school's procedures for unauthorised absence and children missing education. Staff should report concerns promptly rather than assuming that an absence is solely an attendance matter.

The school has an admission register and an attendance register that are monitored daily. Where absence becomes persistent, severe or otherwise concerning, the school will consider the appropriate support and escalation in accordance with its Attendance Policy, safeguarding procedures and statutory attendance guidance.

There is also regular scrutiny of attendance data so that the school can identify individual pupils or cohorts requiring additional support, examine historic and emerging patterns and develop appropriate strategies to address barriers to attendance.

Admission Register and Children Missing Education

New students are put on the admission register on the first day that the school and a person with control of the pupil's attendance have agreed that the pupil will attend. Where no date has been agreed or notified, the pupil will be entered on the register on the first day on which they attend.

If a pupil fails to attend on the agreed or notified date, the school will make reasonable enquiries promptly to establish the child's whereabouts and circumstances and will work with the relevant local authority where appropriate.

The school will regularly remind parents to provide updated personal, contact and education information whenever circumstances change. This can assist the school and local authority in dealing with pupil welfare and safeguarding concerns and in locating children whose whereabouts become uncertain.

The admission register will contain the information required by the [School Attendance \(Pupil Registration\) \(England\) Regulations 2024](#), including:

- the full name of the pupil
- the pupil's current address
- the full name and address of any parent with whom the pupil normally lives
- at least one telephone number by which a parent with whom the pupil normally lives can be contacted in an emergency, with the school seeking additional emergency contacts wherever practicable
- where applicable, the pupil's future address, the full name and address of the parent with whom the pupil is going to live and the date the pupil is expected to start living there
- where applicable, the name of the pupil's destination **or other** school and the date on which the pupil began or is expected to begin attending there; and
- where a pupil is removed from the register, the statutory ground under Regulation 9 on which the pupil's name has been deleted

The current statutory CME guidance sets out these registration and information-sharing requirements.

When a parent notifies the school of a change of address, the school will record the new address, the full name of each parent with whom the pupil will normally live there and the date from which the pupil will normally live at that address.

If a parent notifies the school that their son/daughter will be attending another school, the admission register will note the name of the new school and the date on which they are due to start attending.

St Benedict's will make the required return to the local authority within five days where a pupil's name is added to the admission register outside a standard transition point. The statutory duty does not ordinarily apply at a standard transition point unless the local authority has requested the information.

The school will only delete the name of a pupil from its admission register where one of the statutory grounds in Regulation 9 of the School Attendance (Pupil Registration) (England) Regulations 2024 has been satisfied. The school will make the required return to the relevant local authority when a pupil's name is deleted outside a standard transition point and will provide the information required by the Regulations.

The school will not use an abbreviated or informal set of grounds for removal from roll. Before removing a child, it will ensure that the requirements of the relevant statutory ground have been met. In particular, where a child has failed to return within 10 school days following authorised leave or has been continuously absent without authorisation for 20 school days, the school and local authority must undertake joint reasonable enquiries before removal and both must be satisfied that there are no reasonable grounds to believe the pupil will return.

The school will continue to co-operate with the local authority in making reasonable enquiries to identify a child's whereabouts even after a CME referral has been made. A child will not simply be removed from roll because their whereabouts are unknown. The updated statutory CME guidance places particular emphasis on schools and local authorities making these enquiries jointly.

Elective Home Education

Schools must inform their local authority of the deletion of a pupil from the admission register for elective home education in accordance with the [School Attendance \(Pupil Registration\) \(England\) Regulations 2024](#).

St Benedict's recognises that many children who are educated at home have a positive educational experience. However, elective home education can also mean that some children are less visible to services which would otherwise support and safeguard them, and in some cases may not be receiving suitable education.

Where a parent/carer has expressed their intention to remove a child from St Benedict's with a view to educating them at home, we will work together with other key professionals and the parents/carers and, wherever possible, seek to coordinate a meeting before the final decision is made to ensure that the parent/carer has considered what is in the best interests of the child.

This is particularly important where a child has SEND, is vulnerable and/or has a social worker. Where the child has an Education, Health and Care Plan, the local authority will need to review the plan and the school will work with the local authority and parents as appropriate.

The school will not encourage the removal of a pupil for elective home education as a means of addressing attendance, behaviour, attainment or safeguarding difficulties. Removal from the admission register will only take place where the legal requirements have been satisfied.

Appendix 5: Visitors on the School Site and Use of the School for Non-School Activities

Visitors on the School Site

Any visitor to the school site will have their identity checked at school reception and they will be required to wear a badge in accordance with the school's visitor procedures. The level of escort or supervision required will be determined according to the nature and purpose of the visit and the visitor's potential contact with children. This applies to visiting parents, contractors, visiting speakers and any other visitors.

KCSIE recognises that schools receive different categories of visitors, including professionals such as educational psychologists and social workers, educational visitors such as speakers and performers, contractors, children's family members and people attending school events. The safeguarding arrangements required will therefore depend upon the nature of the visit.

For visitors attending in a professional capacity, the school will check their identity and be assured that the appropriate DBS check has been undertaken where the activities they are carrying out require one. This assurance may be provided by the visitor's employer. In these circumstances, the school should not ask to see the DBS certificate itself. Where a professional visitor will have no contact with children, a DBS check is unlikely to be required.

The school will not request DBS or barred list checks, or ask to see existing DBS certificates, simply because somebody is visiting the school, for example a parent attending a sports day. The Head or other appropriate senior leader will use professional judgement to determine the level of escort or supervision required.

Contractors are subject to the separate safer recruitment and contractor arrangements set out elsewhere in this policy. Their identity will always be checked on arrival and the school will ensure that the appropriate level of safeguarding check has been undertaken for the work they are carrying out.

Visiting Speakers and External Organisations

St Benedict's has visiting speakers frequently, and as part of our responsibility under Prevent we ensure that appropriate consideration is given to the suitability of speakers and external organisations and to the safeguarding implications of their involvement with pupils.

Before approving a visiting speaker or external organisation, the school will consider the educational value of the proposed activity, its age-appropriateness, the suitability of the individual or organisation and whether any relevant safeguarding checks are required. This reflects KCSIE's express expectation that schools consider the suitability of external organisations and set out arrangements for people coming onto their premises.

We do this by ensuring that the Deputy Head Pastoral and other appropriate staff have sufficient information to establish the identity and suitability of the speaker or organisation and the purpose of the talk. The school will make prior contact with the speaker to organise this and will determine appropriate arrangements for supervision while they are on site.

Where relevant, due diligence will include consideration of publicly available information about the speaker or organisation and any potential safeguarding, Prevent, political impartiality or reputational concerns. Visiting speakers will be informed of the school's expectations and of the nature and age of their intended audience.

In the unlikely event of material being presented which gives rise to a safeguarding concern, promotes terrorism or extremist ideology, or is otherwise inappropriate for pupils, the member of staff responsible for the event will intervene appropriately. Depending on the circumstances this may include challenging or contextualising what has been said or bringing the session to an end.

The school's commitment to safeguarding and the Prevent duty does not prevent pupils from hearing and discussing challenging or controversial ideas in an appropriate educational context. Such discussion should be

properly supervised and, where political issues are presented, managed in accordance with the school's duties relating to political impartiality.

Each visiting speaker will be evaluated by the organiser and, should they not meet the needs of our students, this will be recorded and taken into account when considering any future engagement with that speaker or organisation. Significant concerns will be reported to the Senior Deputy Head and/or Deputy Head Pastoral as appropriate.

Contractors, regular visitors and others whose roles bring them into contact with pupils will be provided with safeguarding information proportionate to their role. Where appropriate, this will include the identity of the DSL and deputies, how to report a safeguarding concern, expected standards of conduct and any relevant site-specific safeguarding arrangements. The level of information or training required will depend upon the nature, frequency and duration of their contact with children.

Using the School for Non-School Activities

Where any of the facilities of the school are hired or rented to organisations or individuals, including community groups, sports associations or other service providers, the governing body will ensure that appropriate arrangements are in place to keep children safe, having regard to [Keeping children safe in out-of-school settings](#).

When services or activities are provided by the governing body under the direct supervision or management of St Benedict's staff, our arrangements for child protection will apply.

However, where services or activities are provided separately by another body, that provider will ordinarily be responsible for its own safeguarding arrangements. St Benedict's will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed, and will ensure that there are arrangements in place for the provider to liaise with the school on safeguarding matters where appropriate.

These requirements apply whether or not the children attending the activity are pupils on the roll of St Benedict's. KCSIE now makes this particularly clear.

Before entering into an arrangement involving activities for children, the school will consider what safeguarding assurance is appropriate in the circumstances. This may include consideration of the provider's safeguarding policy, procedures for reporting concerns and allegations, safer recruitment and DBS arrangements, supervision, staff conduct, emergency arrangements and the identity of the person with lead responsibility for safeguarding.

Safeguarding requirements will be included in any transfer of control agreement, including any lease or hire agreement, as a condition of use and occupation of the premises. The agreement will make clear that failure to comply with the safeguarding requirements would lead to termination of the agreement.

Organisations hiring the school's premises for activities involving children will be expected to inform St Benedict's promptly of any safeguarding issue arising from their use of the premises where this is relevant to the school's safeguarding responsibilities or the continuing suitability of the hire arrangement.

If St Benedict's receives an allegation about a safeguarding incident that happened when an individual or organisation was using our premises for the purposes of running activities for children, we will follow our own safeguarding policies and procedures, including informing the LADO. Where a child has been harmed, is at immediate risk of harm or requires other statutory safeguarding intervention, the DSL will also ensure that local authority children's social care and/or the police are contacted as appropriate. KCSIE specifically confirms that allegations arising from organisations using school premises remain matters to which the school's safeguarding procedures, including LADO involvement, apply.

Appendix 6: Remote Learning and Alternative Provision

Remote Learning

KCSIE continues to apply during any times of remote learning for individuals or groups of students. The best interests and safety of our students always come first. If anyone has a safeguarding concern, they should act immediately to pass on this concern as they would do normally using MyConcern and/or direct contact with one of the DSLs.

Should issues arise, the DSL team are available via the main school number (020 8862 2000) or via the DSL email address (dsl@stbenedicts.org.uk).

With regard to students' remote learning, St Benedict's will monitor participation in lessons and following up with parents and students where students are falling behind. Parents are asked in any case to contact the attendance email address as usual if their children are ill or unable to attend lessons for any other reasons.

If a member of staff or volunteer working remotely has a concern about another staff member or volunteer posing a safeguarding risk, they should contact the Head on 020 8862 2010.

Child-on-child abuse does not disappear during a period of remote learning, as it can just as easily happen online as in person. Additional information on keeping safe with online learning can be found in the 'protocols for online video sharing and online classrooms' below.

All staff are trained annually in safeguarding. In particular staff are aware of the need to look out for mental health issues relating to students' remote learning.

Exactly the same recruitment criteria as detailed elsewhere in this policy will apply at St Benedict's if recruitment is done remotely.

Protocols for online video sharing and online classrooms

1. Both students and staff should be in a common space in their house wherever possible
2. Students and staff may dress informally but not casually – essentially the same as would be expected for an own clothes day in school
3. Behaviour and conversation between students and between students and staff should be exactly as we would expect in school
4. If a student misbehaves or becomes upset for any reason in an online session, their parents will be informed by email. In particular, students must not record any classes being held online without the permission of a teacher, and misuse of any recorded video or images of teachers or other students will be taken very seriously and could potentially be a safeguarding issue
5. If a student repeatedly misuses the school technology, then they may have to be banned from its uses in line with the school's Behaviour and ICT policies
6. Microsoft Teams should not be used as a purely social medium between the students. It is for education purposes and if any discussions between students stray from academic relevance they will be shut down as there are many other social media platforms they can use to chat informally. As ever, any poor behaviour and/or language in student interactions will be dealt with in line with the school's Behaviour and ICT policies
7. If anyone does have a concern about inappropriate use of the school's online resources or behaviour in online

class or video, then they should report this immediately

One-to-one counselling or pastoral conversations will be done by phone following best safeguarding practice

Alternative Provision

Sometimes students are educated in Alternative Provision: The DoFE defines Alternative Provision in [Arranging Alternative Provision](#) as 'education arranged by local authorities for pupils who, because of exclusion, illness or other reasons, would not otherwise receive suitable education'. It also includes education arranged by schools 'for children on a suspension (fixed-period exclusion), and for children being directed by schools to off-site provision to receive education intended to improve their behaviour.'

We understand that where a student is with an alternative provision we continue to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. Unless a child is working at home under parental supervision we will obtain written information from an alternative provider of their safeguarding checks of those working at their establishment (that we would perform on our own staff) and gain written confirmation that this provider will inform us of anything that happens that might put the child at risk i.e. staff changes so that we can ensure appropriate safeguarding checks have been carried out on new staff.

We must always know where a child is based in school hours so will ask for records of the address of the alternative provider or other subcontracted provision. We will review this alternative provision regularly (at least half-termly) so we are assured of regular attendance and safety. If safeguarding concerns arise the alternative provision will be reviewed and ended if necessary.

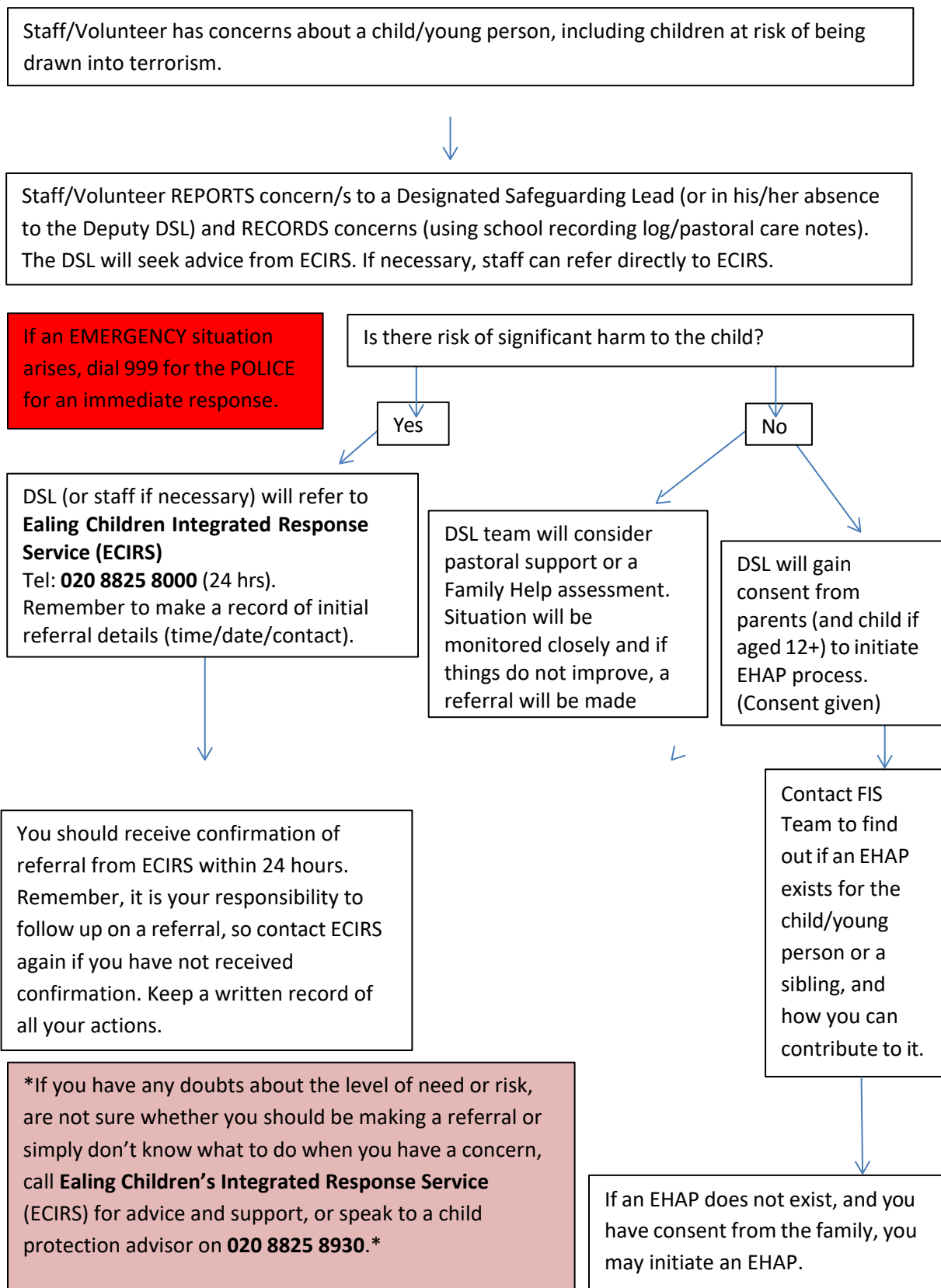
See also [Education for children with health needs who cannot attend school](#)

Appendix 7: Key Documents

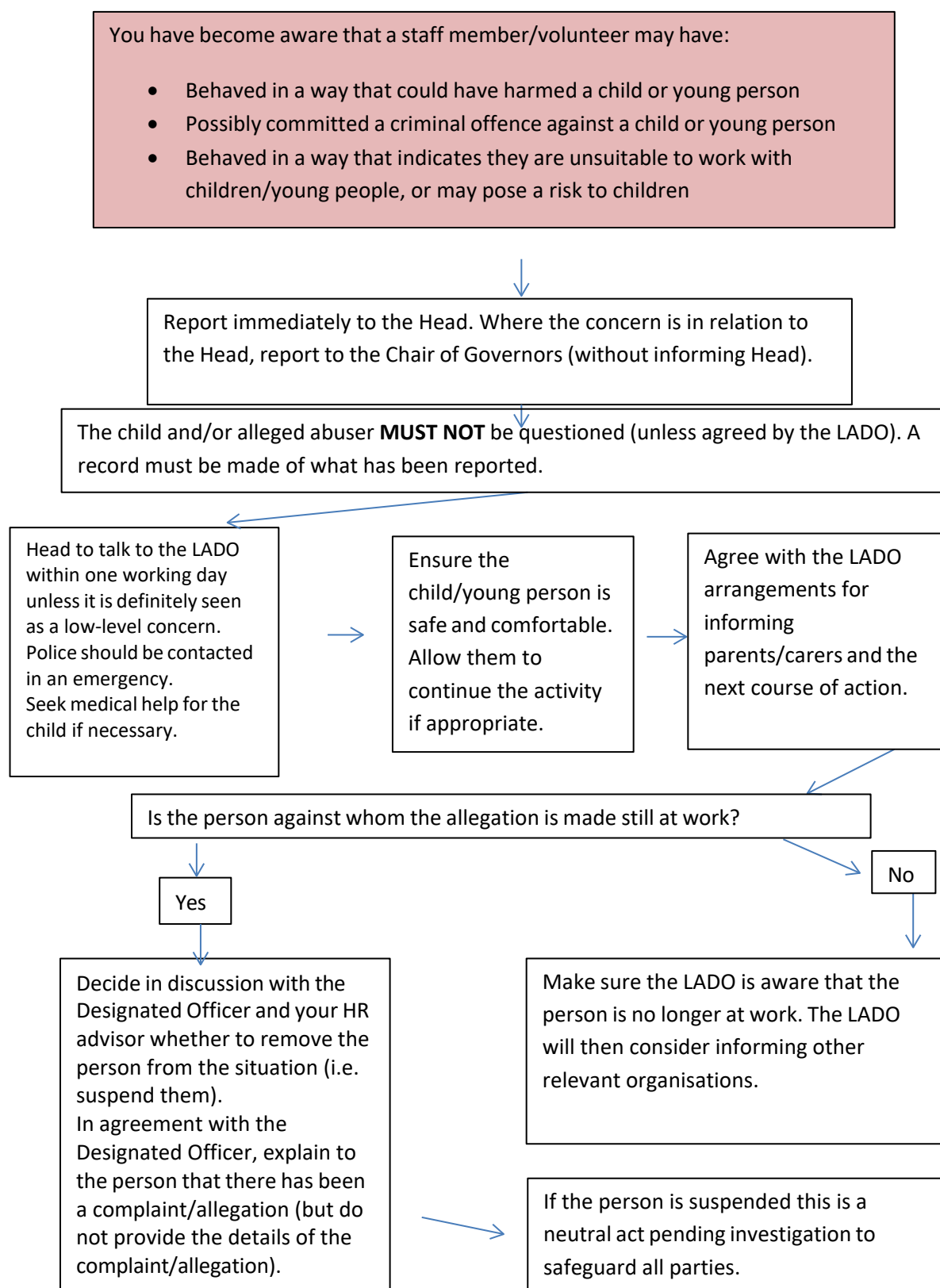
The DfE guidance that St Benedict's has regard to in this policy includes:

- [Keeping Children Safe in Education](#) (2026) (KCSIE)
- [Early Years Foundation Stage Statutory Framework](#) (2026)
- KCSIE incorporates the additional statutory guidance: [Disqualification under the Childcare Act \(2018\)](#)
- [Working together to improve school attendance](#) (2026)
- [Working together to Safeguard Children](#) (2026) (WT)
- WT refers to the non-statutory but important advice: [Information sharing: advice for safeguarding practitioners](#) (2024)
- [Prevent Duty Guidance: For England and Wales](#) (2023) (Prevent)
- [The Prevent Duty: safeguarding learners vulnerable to radicalisation](#)
- [Children Missing Education](#) (2025)
- [Restrictive interventions, including use of reasonable force, in schools](#) (2026)
- [The use of social media for on-line radicalisation](#) (2015)
- [Mobile Phones in schools](#) (2026)
- [What to do if you are Worried a Child is Being Abused – Advice for Practitioners](#) (2015)
- [Government Guidance for Child Knife Possession Offences](#)
- [Filtering and monitoring standards for schools and colleges](#) (2022)
- [Sharing nudes and semi-nudes: advice for education settings](#) (2024)

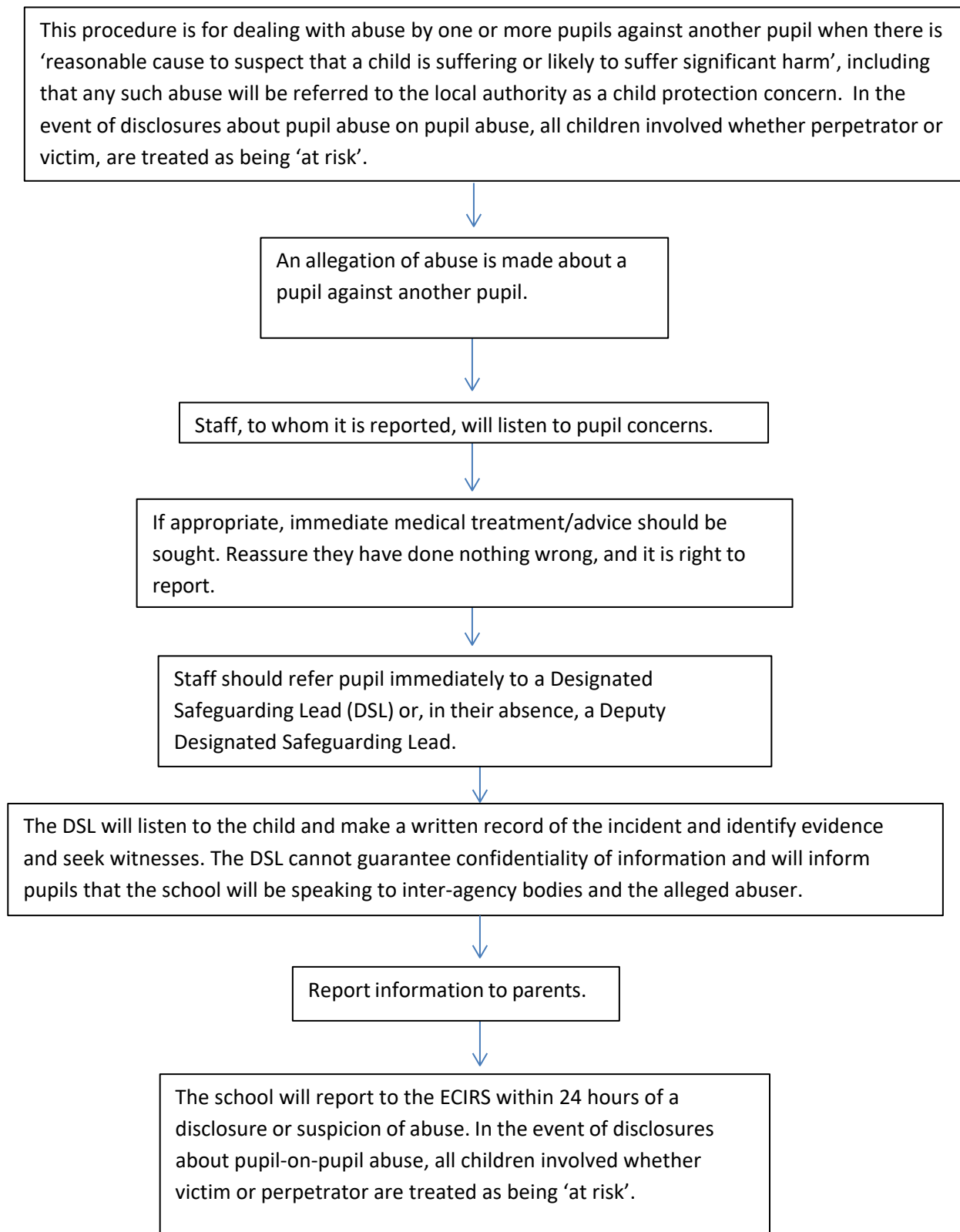
Flowchart 1: Dealing with Concerns about a Child/Young Adult



Flowchart 2: Dealing with an Allegation of Child Abuse against an Employee, Volunteer or Any Other Person Working at a School



Flowchart 3: Procedures for Dealing with Abuse by One or More Pupils Against Another Pupil



Flowchart 4: Online Safety Incident Raised by a Child/Young Person or Member of St Benedict's School

