



Child Protection and Safeguarding Policy

2026–2027

Including Early Years, before- and after-school care,
Holiday Club and all off-site school activities

SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

If in doubt, report it.

Local Authority Designated Officer	Wolverhampton's Local Authority Designated Officer's (LADO) contact details are: • Tel: 01902 550477 • Secure email: <u>LADO@secure.wolverhampton.gov.uk</u> - when personal or confidential information including names of individuals) needs to be sent to the Designated Officer • Non-secure email: <u>LADO@wolverhampton.gov.uk</u> when no confidential information is being sent / general enquiries
Local Authority Children's Social Services	Contact Name: Safeguarding Service Telephone: 01902 550477 Outside office hours, contact our emergency service on - 01902 552999 E-mail: <u>wscb@wolverhampton.gov.uk</u>
Multi-Agency Safeguarding Hub	If you are concerned about a child's welfare, please contact the MASH using the phone numbers. Daytime 8.30-5.00pm (Mon-Thurs) and 4.30pm (Fri) 01902 555392
Support and Advice about Extremism	Police CTU Prevent Hub on 0121-251-0241. EMERGENCY: 999 NON EMERGENCY NUMBER: 101 EMAIL: <u>CTU_gateway@west-midlands.pnn.police.uk</u> Local Authority If you have any concerns about someone and would like more advice please contact the Community Safety Team by sending an email to <u>safer@wolverhampton.gov.uk</u> or telephone on 01902 551214. Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: <u>counter.extremism@education.gsi.gov.uk</u>

NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbb.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000100 EMAIL: concerns@isi.net

KEY SCHOOL CONTACT DETAILS

Directors	Chair of Directors: Guy Birkett Nominated Safeguarding Director Mr H Khela TEL: c/o 01902 751088 EMAIL: c/o_office@newbridgeprepschool.org.uk
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Designated Safeguarding Lead ("DSL") {and Deputy Designated Safeguarding Lead ("DDSL")}	Main DSL for the School Mrs Nicky Burrows-Berry TEL: 01902 751088 EMAIL: nburrows-berry@newbridgeprepschool.org.uk Deputy DSL Mr Jonathan Goulding TEL: 01902 751088 EMAIL: jgoulding@newbridgeprepschool.org.uk EYFS DSL and Deputy DSL Mrs Hannah Griffiths TEL: 01902 751088 EMAIL: hgriffiths@newbridgeprepschool.org.uk
Designated Teacher for Looked After Children	Mrs Nicky Burrows-Berry TEL: 01902 751088 EMAIL: nburrows-berry@newbridgeprepschool.org.uk
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1. Policy Statement

Newbridge Preparatory School is committed to safeguarding and promoting the welfare of every child. The welfare and best interests of the child are paramount. All children have the right to be protected from abuse, neglect, exploitation and harm, and to receive timely support when needs emerge.

The School provides a safe, caring and vigilant environment in which children are listened to, respected and encouraged to speak to a trusted adult. Safeguarding is not the responsibility of one person or one team: every adult working for or on behalf of the School must recognise concerns, act promptly and report without delay.

The School maintains an attitude of 'it could happen here'. The absence of reported concerns is not evidence that abuse is not occurring. Staff must be professionally curious, notice small changes and avoid dismissing incidents as one-offs without recording and considering the wider picture.

2. Safeguarding Principles

- The child's welfare and best interests are the primary consideration.
- Safeguarding is everyone's responsibility.
- Children will be listened to and their wishes and feelings considered.
- Concerns will be acted upon promptly and recorded accurately.
- Information will be shared lawfully and proportionately when needed to protect a child.
- Data protection law will never be used as a reason not to share necessary safeguarding information.
- Support will be offered as early as possible through School provision, Family Help or statutory services.
- Safeguarding decisions will be inclusive, evidence-informed and free from discrimination.
- Staff will maintain professional boundaries and report concerns about adults.
- The Board of Directors will provide effective oversight, challenge and assurance.

3. Aims

- To protect pupils from maltreatment, whether within or outside the home, including online.
- To prevent impairment of children's mental and physical health or development.
- To ensure children grow up in circumstances consistent with safe and effective care.
- To take action to enable all children to have the best outcomes.
- To ensure staff understand indicators of abuse, neglect and exploitation and know how to respond.
- To maintain clear procedures for referrals, record keeping, information sharing and escalation.
- To create a culture in which children and adults can raise concerns without fear.
- To ensure safe recruitment and continued suitability of all adults working with pupils.
- To comply with statutory guidance and the Independent School Standards.

4. Scope

This policy applies whenever the School is responsible for pupils, including during the normal school day, Early Years provision, Morning Care, After-School Care, Holiday Club, clubs, fixtures, rehearsals, educational visits, residential visits, remote teaching and School-organised transport.

It applies to employees, Directors, supply and agency staff, contractors, volunteers, trainee teachers, students, peripatetic teachers, visiting professionals and external providers using the School's premises or working with its pupils.

Safeguarding concerns arising outside School, including at home, in the community or online, will be considered where they may affect a pupil's safety, welfare or education.

5. Statutory Framework

This policy has regard to current legislation and statutory guidance, including:

- Keeping Children Safe in Education 2026.
- Working Together to Safeguard Children 2026.
- The Children Acts 1989 and 2004.
- The Education Acts and the Independent School Standards.
- The Education (Independent School Standards) Regulations 2014.
- The Early Years Foundation Stage statutory framework.
- The Prevent Duty and associated guidance.
- Information-sharing advice for safeguarding practitioners.
- Children Missing Education guidance and attendance guidance.
- Equality Act 2010 and Human Rights Act 1998.
- Data Protection Act 2018 and UK GDPR.
- Female Genital Mutilation Act 2003 and mandatory reporting duties.
- Safeguarding Vulnerable Groups Act 2006 and DBS requirements.

The School will also follow Wolverhampton safeguarding partnership procedures and the advice of the Local Authority Designated Officer, children's social care, police and other statutory agencies.

6. Definition of Safeguarding

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

Child protection is part of safeguarding and refers to action taken to protect children who are suffering or are likely to suffer significant harm.

7. Equality and Inclusion

The School recognises that safeguarding risks and responses may be affected by disability, SEND, communication needs, race, religion, sex, sexual orientation, family circumstances, economic disadvantage, care status and other factors. Some children face additional barriers to recognising or reporting abuse.

- Staff will avoid assumptions and stereotypes.
- Reasonable adjustments will be made so children can understand and use reporting routes.
- Behaviour associated with SEND will not automatically be attributed to the child's condition.
- Discriminatory abuse, prejudice-based bullying and harassment will be challenged.
- The School will consider intersectional vulnerabilities and the child's lived experience.

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered and raised where appropriate.

8. Roles and Responsibilities

8.1 Board of Directors

- Ensure safeguarding arrangements comply with legislation and statutory guidance.

Safeguarding is everyone's responsibility — If in doubt, report it.

- Appoint a trained Nominated Safeguarding Director.
- Ensure the School has an effective DSL with sufficient authority, time, funding, training and resources.
- Ensure policies are reviewed at least annually and are implemented in practice.
- Oversee safer recruitment, the Single Central Record, online safety, filtering and monitoring and allegations procedures.
- Receive suitable safeguarding reports and test assurance rather than relying only on written statements.

8.2 Headmistress

- Promote a strong safeguarding culture and ensure procedures are followed.
- Ensure staffing, supervision, premises and operational arrangements safeguard pupils.
- Manage allegations and low-level concerns concerning adults, except where the concern relates to the Headmistress.
- Ensure staff receive induction, training and updates.
- Support the DSL and act on safeguarding advice.

8.3 Designated Safeguarding Lead

- Take lead responsibility for safeguarding and child protection, including online safety and understanding filtering and monitoring.
- Provide advice and support to staff and make or coordinate referrals.
- Maintain secure, accurate safeguarding records and a clear chronology.
- Work with children, parents and external agencies.
- Ensure prompt transfer of safeguarding files.
- Promote Family Help and multi-agency working.
- Provide safeguarding reports to the Board and identify themes, trends and learning.
- The School maintains robust DSL cover arrangements, including access to a shared safeguarding email account and documented escalation arrangements to ensure concerns can be acted upon immediately when the DSL is unavailable
- Maintain oversight of all pupils attending Alternative Provision and ensure safeguarding, attendance, welfare and information-sharing arrangements remain effective.

8.4 Deputy Designated Safeguarding Leads

DDSLs are trained to the same standard as the DSL and may carry out delegated functions. The DSL retains overall lead responsibility. Staff may report to any available DSL or DDSL and must not delay because a particular person is unavailable.

8.5 Volunteers, Contractors and Visitors

All adults on site must follow safeguarding, conduct, security and reporting arrangements appropriate to their role. They must report concerns immediately and must not assume that another person will act.

9. Staff Responsibilities

All staff, including those who do not work directly with children, must read at least Part One of KCSIE 2026 and confirm that they understand it.

All staff must:

- Provide a safe environment in which children can learn.
- Recognise indicators of abuse, neglect, exploitation and vulnerability.
- Report concerns immediately to the DSL or a DDSL.

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- Record concerns accurately and on the same working day.
- Know the School's Family Help and child protection procedures.
- Understand the response to children absent from education.
- Know how to report concerns about adults, including low-level concerns.
- Maintain professional boundaries and follow the Staff Code of Conduct.
- Understand online safety and the School's filtering and monitoring arrangements.
- Make a direct referral to children's social care or police where necessary if senior staff are unavailable or action is not being taken.
- Recognise, challenge and report misogynistic, sexist, discriminatory or harmful gender-based behaviour that may present a safeguarding concern.

Staff must never promise confidentiality, investigate allegations themselves, confront an alleged perpetrator, or delay reporting while seeking proof.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

All staff should:

- listen carefully
- All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled. The record should 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, the decision reached and the outcome.

In the first instance, this should be recorded on 'My Concern' our online platform for recording concerns:

[Log In - MyConcern](#)

It then should be discussed immediately with the DSL/DDSL. If after discussion with the DSL/DDSL a more detailed report is needed a Child Protection Monitor Form (Confidential) will be requested.

The information will be kept confidential and stored securely by the Headmistress' / DSL ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in KCSIE 2026.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the pupil/s at their heart.

10. Listening to Children

Our school ethos demonstrates that the effective safeguarding of children can only be achieved by putting children at the centre of a system where we listen and hear what they say. There are a number of arrangements in place in school for listening to children and providing early help, the main one being the accessibility of adults and the positive relationships we foster with the children in our care. There is a strong pastoral support system through the class teacher / form teacher with three main points of contact a day (Morning registration, Afternoon registration and Dismissal). A calm room which is open for pupils in Upper School on request.

There are also specific times where it is reinforced to all children in an age-appropriate way and stage of development that they can speak to any trusted adults, for example through School Council Meetings and Form Time and through the PHSE (Jigsaw and SMSC lessons).

Children will be treated with dignity and taken seriously. Staff should listen calmly, allow the child to speak in their own words, use open prompts only where needed and explain that information must be shared with people who can help.

- Do not ask leading or repeated questions.
- Do not express shock, disbelief or blame.
- Do not ask the child to confront another person.
- Record the child's words as accurately as possible.
- Consider communication needs, age, SEND and cultural factors.
- Remain alert to non-verbal disclosures and changes in behaviour.

11. Confidentiality and Information Sharing

Safeguarding information is confidential but is not secret. From 30 September 2026, under section 16LA of the Children Act 2004, the School has a legal duty to share relevant information with another organisation covered by the duty where the information may help that organisation to assess need or risk, make a decision, provide support or take action to safeguard or promote a child's welfare.

There is no requirement for a particular safeguarding threshold to be met before relevant information is shared. The duty applies to early help and emerging or unmet needs, as well as concerns that a child is suffering or likely to suffer harm.

- Information will be shared lawfully, fairly, proportionately and securely.
- Consent is not required where the statutory information-sharing duty applies. The School will normally be open with children and families about what information will be shared and why, unless doing so could place a child or another person at risk or prejudice an investigation.

Safeguarding is everyone's responsibility — If in doubt, report it.

- A child's or family's objection to information being shared does not remove the School's duty to share relevant safeguarding information.
- Families may choose whether to accept support offered through early help or other services, but they cannot prevent the School from sharing relevant information under the duty.
- Staff must not promise a child or family that safeguarding information will remain confidential.
- Information shared must be relevant, accurate, necessary and limited to what is required.
- The duty applies both when the School proactively identifies relevant information and when it receives an appropriate request from another organisation covered by the duty.
- Decisions about information sharing, including what was shared, with whom and why, will be recorded.
- Concerns or uncertainty should be discussed promptly with the DSL and, where appropriate, the Data Protection Officer. Uncertainty must not delay necessary or emergency safeguarding action.
- Information will only be withheld where, exceptionally, professional judgement determines that sharing would be more detrimental to the child than not sharing. Any such decision must be carefully considered, recorded and reviewed.

A disclosure made in accordance with the statutory information-sharing duty does not breach an obligation of confidence. Data protection law does not prevent necessary safeguarding information from being shared, but continues to govern how information is handled and shared securely.

12. Safeguarding Records

Safeguarding records will be maintained separately from general educational records, stored securely and accessed only by authorised persons. MyConcern is the School's principal safeguarding recording system.

- Records must be factual, clear, chronological and contemporaneous.
- The child's exact words should be recorded where possible.
- Observation, third-party information and professional opinion must be distinguished.
- DSL decisions, advice, referrals, parental contact, support and review dates must be recorded.
- Patterns across attendance, behaviour, first aid and pastoral information must be considered.
- Safeguarding files must be transferred securely and promptly when a pupil moves school, with receipt confirmed. DSLs will consider sharing wider safeguarding information where this supports assessment of risk to self or others and will normally hold a professional discussion with the receiving DSL.

Urgent concerns must be spoken directly to the DSL; entering a concern on MyConcern alone is not sufficient where immediate action may be needed.

13. Family Help

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Family Help

Family Help provides coordinated support for children and families whose needs have been identified and require targeted multi-agency intervention. It builds on the principles of early intervention and may be appropriate where needs are developing but the child does not require immediate statutory child protection.

- Staff should identify children who may benefit from additional support and report concerns to the DSL.

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- The child's wishes and feelings should be considered.
- Where appropriate, parents will normally be involved and their consent sought for voluntary support. However, lack of parental consent must not prevent appropriate safeguarding action where there is a risk of harm.
- An assessment should identify strengths, needs, risks, actions, responsible professionals and review dates.
- Support must be reviewed to determine whether the child's circumstances are improving.
- Refusal of Family Help does not remove the School's duty to act where safeguarding concerns remain.
- Family Help must never replace an immediate referral to Children's Social Care where a child is suffering, or is likely to suffer, significant harm.

Universal Services and Early Help

Any child may benefit from universal services and community-based Early Help, but all staff should be particularly alert to the potential need for additional support for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is persistently absent from education, including persistent absences for part of the school day

Universal services and community-based Early Help provide support as soon as needs emerge at any stage of a child's life. Early identification and intervention can prevent concerns from escalating and reduce the need for more intensive statutory intervention.

In the first instance, staff who consider that a pupil may benefit from universal support, community-based Early Help or Family Help should discuss this with the School's DSL. The DSL will consider the most appropriate response in accordance with Wolverhampton Safeguarding Together threshold guidance, including referral to Family Help or Children's Social Care where appropriate. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. All concerns will be kept under review and, where a child's circumstances do not appear to be improving or risks increase, consideration will be given to making a referral to Children's Social Care.

Wolverhampton Family Help and Early Help Arrangements

The School follows the multi-agency safeguarding arrangements operated by Wolverhampton Safeguarding Together. Whilst KCSIE 2026 introduces the national Family Help model, the School will continue to follow Wolverhampton's local referral pathways and assessment processes until revised local arrangements are implemented.

The School follows Wolverhampton's Working Together Early Help and Thresholds Continuum. Details of these arrangements can be found in the document *Multi-Agency Children Services Threshold Guidance Continuum of Help and Support 2020 – Version 2 – January 2021*, available at:

https://www.wolverhamptonsafeguarding.org.uk/images/Final_Threshold_Doc.pdf

An Early Help Assessment should be completed with the child and family to identify their strengths and needs, and to gain targeted support from multi-agency Early Help services. Key services that may provide support at this level include:

- Early Help Services (including parenting support, Education Welfare, Educational Psychology, Family Support, SEND Support and CAMHS Early Intervention)
- Team Around the Family interventions led by partner agencies
- A range of commissioned services
- Targeted Youth Work
- Housing Support
- Additional Learning Support

Further information regarding available services can be found via the Wolverhampton Information Network.

Eclipse

Eclipse is Wolverhampton's online Early Help Assessment system. It enables an assessment of the whole family to be recorded with the family's consent.

Staff requiring access or training should speak to the DSL or the Headmistress, who can request access using the Eclipse New User Access Form where appropriate to their role in supporting children, young people and families.

14. Responding to Concerns

What staff should do if a child is in danger or at risk of harm

If staff (including Directors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Executive is Wolverhampton Safeguarding Children Executive and Wolverhampton Safeguarding Together (The City of Wolverhampton Council, West Midlands Police and The NHS Black Country Integrated Care Board).

A full copy of their local procedures can be found on their website:

<https://www.wolverhamptonsafeguarding.org.uk/report-a-concern>

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Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm on **01902 555392**

Outside of the above hours for emergencies on **01902 552999**

You should report your concerns by phone or by completing the **Wolverhampton Safeguarding Together online Multi-Agency Referral Form (MARF)**. If you initially report a concern by phone, you must always complete the online MARF within 1 hour of any phone call preferably after having spoken with the DSL or DDSL.

Sometimes it may be appropriate or necessary for an adult to have one-to-one contact with a child or supervise a small group of children on their own. Where children are engaged in close one-to-one teaching, particularly in music tuition, performing arts or sports, it is also vital to make sure children and young people are safe during such teaching lesson. This includes making sure all 1-1 peripatetic teachers have undergone the necessary checks, and steps are taken to mitigate any risks during sessions. Here are steps you can take to make sure everyone feels safe:

- work in a room that has windows and ensure blinds are open so other people can see in
- leave the door to the room open, if not a fire door. (All doors have a vision panel)
- make sure there is another adult within earshot and/or the room is not secluded or is on a busy corridor/thoroughfare
- maintain a professional relationship (for example by working at a desk or an appropriate distance and dressing appropriately for work)
- Any physical contact is appropriate to the teaching and kept to a bare minimum.

14.1 Immediate Danger

Where a child is in immediate danger, requires urgent medical attention or a crime is in progress, staff must call 999, protect the child and inform the DSL without delay.

14.2 Disclosure or Observation

1. Listen, remain calm and take the child seriously.
2. Do not promise secrecy or investigate.
3. Report immediately to the DSL or DDSL.
4. Record the concern on MyConcern on the same working day.
5. Preserve evidence and follow safeguarding advice.

14.3 DSL Decision-Making

The DSL will consider immediate safety, the child's voice, previous concerns, family circumstances, whether parents can safely be informed, whether Family Help is sufficient, and whether social care, police, health or other specialist involvement is required.

14.4 Parents and Carers

Parents will normally be informed and involved unless doing so may increase risk, prejudice an investigation, lead to evidence being destroyed, or otherwise be contrary to the child's welfare. The decision and rationale will be recorded.

14.5 Direct Referrals and Escalation

Any member of staff may make a direct referral to children's social care or police. Where the School remains concerned after an agency decision, the DSL will use professional challenge and local escalation procedures. The School will continue to support and monitor the child after referral.

15. Specific Safeguarding Issues

15.1 Abuse, Neglect and Exploitation

Abuse may be physical, emotional or sexual; neglect is persistent failure to meet basic physical or psychological needs. Exploitation may be sexual, criminal, financial, online or otherwise and may involve coercion, deception, exchange or abuse of power.

15.2 Physical Abuse

May include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, inappropriate physical punishment or deliberately causing illness.

15.3 Emotional Abuse

Persistent emotional maltreatment may include conveying worthlessness, silencing, humiliation, intimidation, exposure to domestic abuse, severe bullying, exploitation or preventing normal social interaction.

15.4 Sexual Abuse

Includes forcing, causing or enticing a child to take part in sexual activity, whether or not the child understands, including contact and non-contact activity, grooming, viewing or creating images and online abuse. Abuse can occur within families, institutions and community settings; children commonly know the person abusing them; and perpetrators can include women and other children.

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

15.5 Neglect

May involve failure to provide food, clothing, shelter, supervision, medical care, education or emotional responsiveness, including neglect during pregnancy.

15.6 Extra-Familial Harm

Children may be harmed in peer groups, neighbourhoods, schools, transport, online spaces and other contexts beyond the family. Assessments must consider locations, relationships and environmental risks.

15.7 Domestic Abuse

Children may see, hear or experience the effects of domestic abuse and are victims in their own right. Operation Encompass notifications will be handled securely and used to provide sensitive support.

15.8 Child Sexual Exploitation

CSE may involve exchange, coercion, grooming, apparent consent, gifts, status, affection, online contact or organised abuse. Children under exploitation may not recognise themselves as victims.

15.9 Child Criminal Exploitation and County Lines

CCE may involve drug movement, theft, violence, intimidation, debt bondage, weapons, missing episodes and exploitation through friendships or family links.

15.10 Serious Violence

Indicators may include increased absence, decline in performance, unexplained injuries, new peer groups, gifts, weapons, threats, exploitation or association with crime.

The School will identify locations, activities and times where pupils may be at increased risk and will consider pupil voice when assessing these risks.

Financial Exploitation and Sextortion

Financial exploitation occurs where a child is manipulated, coerced, deceived or pressured into providing money, financial information, goods, services or other benefits to another person.

This may include:

- Online scams and fraudulent activity.
- Theft of money or possessions.
- Coercion to transfer money or make purchases.
- Criminal exploitation for financial gain.
- Misuse of bank accounts or online payment platforms.
- Financially Motivated Sexual Extortion (FMSE) or "sextortion".

Financially Motivated Sexual Extortion is a form of online abuse in which a child is coerced into sharing nude or semi-nude images or videos and is then blackmailed for money, further images or other demands. Perpetrators may target children through social media, gaming platforms, messaging applications or other online services.

Children may experience financial exploitation from individuals acting alone, organised groups, online offenders, peers or people known to them.

Possible indicators may include:

- Unexplained requests for money.
- Distress after using social media or online platforms.
- Secretive online activity.
- Unexplained financial transactions.
- Fear that images or personal information may be shared.
- Sudden withdrawal from friends, family or school activities.
- Reports of threats, blackmail or online coercion.

Any concern relating to financial exploitation, online fraud, scams, sextortion or financial coercion must be reported immediately to the DSL and recorded on MyConcern.

Staff must never attempt to investigate the matter themselves or require a child to show images. The School will follow current safeguarding guidance and involve external agencies where appropriate.

15.11 Modern Slavery and Trafficking

Children may be trafficked or exploited for criminality, labour, domestic servitude or sexual abuse. Movement is not required for modern slavery to occur.

15.12 So-Called Honour-Based Abuse

Includes practices used to control behaviour in the name of perceived family or community honour. It may involve violence, threats, forced marriage, FGM, isolation or surveillance.

15.13 Female Genital Mutilation

All concerns must be reported. A teacher who discovers that FGM appears to have been carried out on a girl under 18 must personally report to police using 101 and inform the DSL.

15.14 Forced Marriage

A forced marriage is one in which one or both people do not freely consent. Staff must not contact family members or attempt mediation where forced marriage is suspected.

15.15 Prevent and Radicalisation

Staff must report concerns that a child may be susceptible to extremist ideology, radicalisation or terrorism. Responses will be proportionate and avoid stereotyping.

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

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999.

If you have any concerns about someone and would like more advice please contact the Community Safety Team by sending an email to safer@wolverhampton.gov.uk or Telephone on 01902 551214.

Alternatively, if you have identified a safeguarding concern in relation to extremist behaviours or vulnerability to extremism the referral form below can be completed and submitted to seek the appropriate support.

To learn more about the Prevent agenda across the UK please [click here](#) to visit the Home Office's Prevent page.

If you have concerns about an individual's behaviour and feel he or she may need support or bringing to the attention of the relevant criminal justice services you can use the referral form:

[Please click here for Channel Referral form](#)

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and Directors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

The Head and DSL also sit on the Police and Primary School Panel and receives regular updates in these meeting with regard to the current 'risk level' in the City.

The current risk is 'Extreme Right Wing'.

15.16 Family Members in Prison

Children may face stigma, emotional distress, financial hardship and disrupted care. The School will consider pastoral and Family Help support.

15.17 Young Carers

Young carers may undertake significant responsibilities affecting attendance, wellbeing and attainment. Their needs will be recognised and support coordinated.

15.18 Homelessness

Homelessness or insecure housing may create safeguarding, attendance and welfare risks and may require referral to housing, Family Help or social care. The School will respond appropriately to notifications received regarding pupils placed in temporary accommodation and will consider attendance, wellbeing and safeguarding needs arising from housing instability.

15.19 Private Fostering

The DSL will notify the local authority where a child under 16, or under 18 if disabled, is living for 28 days or more with someone who is not a parent, person with parental responsibility or close relative.

15.20 Children with a Social Worker

The DSL will ensure relevant staff understand how adversity and trauma may affect learning, behaviour and attendance, and will work with the social worker and virtual school arrangements where applicable.

15.21 Looked-After and Previously Looked-After Children

The designated teacher and DSL will work together to ensure appropriate information, support, care planning and educational provision.

15.22 SEND and Health Needs

Children with SEND or health needs may be more vulnerable, may have communication barriers and may show changes that are wrongly attributed to their condition.

15.23 Abuse Linked to Faith or Belief

Concerns may include harmful practices, accusations of spirit possession, witchcraft, ritual abuse, extreme discipline or withholding medical treatment.

15.24 Children Who Go Missing

Missing episodes may indicate abuse, exploitation, trafficking, family conflict or mental health risk. Each episode will be followed up and patterns analysed.

15.25 Response to Specific Concerns

Staff must report immediately, preserve evidence, avoid investigation and follow DSL or statutory-agency advice. The issue label must never distract from the child's individual circumstances.

16. Child-on-Child Abuse

16.1 Principles

Newbridge recognises that children can abuse other children inside or outside School and online. All staff must maintain an attitude of 'it could happen here'. Abuse will not be dismissed as banter, joking, boys being boys, girls falling out or an inevitable part of childhood. All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate. Staff should report related safeguarding concerns promptly to the DSL and record them on MyConcern, considering the impact on the child and any pattern of incidents.

The School will actively challenge misogyny, sexism, sexual harassment and harmful gender-based attitudes.

Safeguarding is everyone's responsibility — If in doubt, report it.

16.2 Forms

Child-on-child abuse may include bullying, physical abuse, sexual violence, sexual harassment, harmful sexual behaviour, abuse in intimate relationships, coercion, initiation or hazing, sharing of nude or semi-nude images, upskirting, stalking, intimidation, discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents) and AI-generated or manipulated abusive content.

16.3 Sexual Violence and Harassment

Sexual violence includes rape, assault by penetration and sexual assault. Sexual harassment is unwanted conduct of a sexual nature, including sexualised comments, name-calling, rumours, gestures, messages, image sharing, pressure, unwanted contact or rating another child's appearance.

16.3A Violence Against Women and Girls (VAWG), Misogyny and Harmful Attitudes

The School recognises that violence against women and girls (VAWG), misogyny, sexist attitudes and gender-based prejudice can contribute to a culture in which abuse, harassment, intimidation and harmful behaviours are normalised.

The School acknowledges that safeguarding incidents may be influenced by harmful attitudes, stereotypes, discrimination, prejudice and behaviours directed towards women and girls. Such attitudes may be displayed by children, adults, online influencers, social media content, peer groups or wider societal influences.

Examples may include:

- Sexist language, jokes or comments.
- Gender-based bullying or harassment.
- Sexualised name-calling.
- Objectification of women and girls.
- Online misogynistic content.
- Coercive or controlling behaviour.
- Intimidation based on sex or gender.
- Sharing harmful stereotypes.
- Justifying, minimising or excusing abusive behaviour.
- Abuse linked to extremist or misogynistic ideologies.

Staff will remain alert to signs that children may be influenced by harmful attitudes towards women and girls, or may be experiencing abuse, harassment or discrimination linked to their sex or gender.

Such concerns will be treated as safeguarding concerns where appropriate and reported in accordance with the School's safeguarding procedures.

The School will challenge sexist, discriminatory and misogynistic language or behaviour whenever it occurs and will not dismiss such behaviour as banter, jokes, teasing, part of growing up or harmless peer interaction.

Through the curriculum, assemblies, Relationships Education, PSHE, online safety education and pastoral support, pupils will be taught:

- Respectful relationships.
- Equality and inclusion.
- Personal boundaries.
- Consent and respect.

- Healthy attitudes towards others.
- Digital citizenship and responsible online behaviour.
- How to recognise and challenge harmful stereotypes.
- How to report concerns and seek support.

The School is committed to promoting a culture of respect, dignity and safety for all members of the School community.

16.4 Harmful Sexual Behaviour

Behaviour must be considered on a continuum, taking account of age, development, understanding, power imbalance, coercion, secrecy, frequency, impact, SEND, technology and wider safeguarding circumstances.

16.5 Reporting and Initial Response

All concerns must be reported immediately to the DSL and recorded on MyConcern. Staff must not mediate, investigate, ask children to confront one another, search personal devices without authority or require an apology as the immediate response.

16.6 Risk and Needs Assessment

Following sexual violence, and where otherwise appropriate, the DSL will complete a written risk and needs assessment covering the child who experienced harm, the child alleged to have caused harm, other pupils, lessons, breaks, transport, clubs, online contact, retaliation and supervision.

16.7 Support and Management

The School may manage internally, seek agency advice, refer to social care or police, provide pastoral and specialist support, impose safety arrangements and take disciplinary action. Support and accountability will be considered for all children involved.

16.8 Images

Any nude or semi-nude image involving a child must be reported immediately. Staff must not view, copy, save, forward, photograph or ask a child to send the image. The DSL will follow current national guidance.

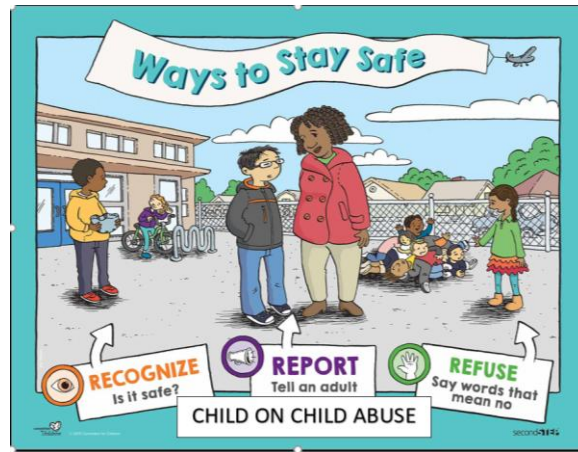
16.9 Prevention

The School will teach consent, boundaries, respectful relationships and online safety; monitor patterns; challenge harmful language; and provide accessible reporting routes.

Pupils will be introduced to the concept of Child on Child abuse through PSHE, SMSC and Form Time with the 3Rs as a procedure:

- Recognise – Is it safe?
- Report – Tell an adult
- Refuse – Say words that mean no

The poster below will be the format used to make the procedures easily accessible and understood by children.



Poster displayed around the school

The school will provide a preventative curriculum programme. Our curriculum ensures that children are taught about safeguarding, including how to stay safe online. Our Jigsaw PHSE curriculum also tackles issues such as:

- Healthy and respectful relationships
- What respectful behaviour looks like
- Consent (If age appropriate for Primary School)
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- Sexual violence and sexual harassment

These issues are addressed in an age-appropriate and inclusive way, and are explored through our computing, relationships and sex education (RSE), and personal, social, health and economic (PSHE) provision.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children which if required will be identified in the pupil's IEHC plan. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The school will provide appropriate and regularly updated staff training Raising Awareness of Child-on-Child Abuse.

The school will challenge inappropriate behaviours. The school's behaviour policy has measures in place to prevent all forms of bullying. As part of enforcing these policies and measures, staff challenge inappropriate behaviours by, for example:

Safeguarding is everyone's responsibility — If in doubt, report it.

- Making clear that sexual violence and sexual harassment is not accepted, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh'

Dismissing inappropriate behaviours risks normalising them. The Behaviour Policy has clear sanctions in place to respond effectively to incidents.

17. Online Safety

17.1 Whole-School Approach

Online safety is integral to safeguarding. The School's approach covers policy, curriculum, staff training, parental engagement, supervision, filtering and monitoring, incident response and regular review.

Teaching children how to keep safe

The Board of Director ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's Computing curriculum (PurpleMash) and is also embedded in PSHE (Jigsaw) and Relationships and Sex Education ("RSE").

CYBER SECURITY STANDARDS FOR SCHOOLS

Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK

As part of our commitment to safeguarding, the School adheres to the Cyber Security Standards for Schools and the statutory guidance outlined in Keeping Children Safe in Education (KCSIE) 2026. We take a proactive approach to managing cyber risks, ensuring robust systems are in place to protect sensitive data and maintain the integrity of our digital infrastructure. Staff receive regular training on cyber security awareness and online safety, and our policies and procedures are regularly reviewed to align with national standards and emerging threats. Online safety is fully integrated into our safeguarding culture and curriculum, ensuring pupils understand how to stay safe in a digital world.

17.2 Four Areas of Risk

The School considers content, contact, conduct and commerce risks, including harmful content, grooming, bullying, image sharing, scams, financial exploitation, misinformation and radicalisation.

17.3 School Systems

Users must follow Acceptable Use arrangements and must not bypass security, share passwords, access harmful content, install unauthorised software, communicate through unapproved channels or upload confidential information to unauthorised services.

17.4 Filtering and Monitoring

The School will maintain proportionate filtering and monitoring which blocks harmful content without unreasonably affecting education, generates useful alerts and is reviewed at least annually. Roles, escalation and technical responsibilities will be clear.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system.

We use Surf Protect for Filtering. Designed by Exa Networks, a leading independent education ISP, SurfProtect Quantum is Prevent Duty-compliant content filtering service which uses a unique Cloud-based design to deliver effective filtering performance around the clock.



We use Smoothwall for Monitoring. Smoothwall uses a pioneering combination of intelligent detection technology, specialist behaviour analysis and updated data libraries. Smoothwall promotes the welfare and wellbeing of learners and staff, making it an effective monitoring system for our schools. There is a portal to login to retrospectively for issues. However, immediate issues are identified by Smoothwall and the Headmistress is made aware via a telephone call in 'real-time.'

smoothwall® Monitor

<https://www.smoothwall.com/education/monitor/>

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises however that children, outside school, have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's E-Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's

management of the associated risks, and the School's IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems. These systems will be reviewed periodically.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

17.5 Devices and Communication

Staff must not use personal devices to photograph pupils, store pupil information or communicate through personal accounts. Remote communication must use approved platforms and maintain professional boundaries.

17.6 Incidents Outside School

The School may act where online conduct outside School places a child at risk, affects welfare or relationships, involves members of the School community or constitutes abuse, bullying or exploitation.

17.7 Education

Pupils will learn about privacy, passwords, healthy use, grooming, scams, image sharing, consent, digital footprints, reporting, blocking, misinformation and AI-generated content, financial exploitation, online scams, fraud and sextortion.

17.8 Mobile Phones, Smart Technology and Personal Devices

17.8.1 Principles

Mobile phones, smart watches, tablets, cameras and other internet-enabled devices can present safeguarding, online safety, data protection and child protection risks.

The School recognises the educational benefits of technology whilst also recognising the risks posed by inappropriate communication, image sharing, online abuse, cyberbullying, grooming, exploitation and access to harmful content.

The use of personal devices by staff, pupils, volunteers and visitors will be managed in accordance with safeguarding requirements, professional expectations and data protection legislation.

17.8.2 Staff Use of Mobile Phones and Personal Devices

Staff must maintain professional boundaries at all times when using mobile phones and personal devices.

Staff must not:

- Use personal devices to photograph or record pupils.
- Store pupil information on personal devices.
- Communicate with pupils through personal telephone numbers.
- Communicate with pupils via personal social media accounts.
- Use unauthorised messaging applications to communicate with pupils or parents.
- Share personal contact details with pupils.
- Access inappropriate or illegal content whilst on School premises or whilst undertaking School duties.

Where communication with parents is necessary, this must take place through approved School systems and communication platforms.

Staff who inadvertently receive safeguarding information through personal devices must inform the DSL immediately.

17.8.3 Pupil Mobile Phones

The School's expectations regarding pupil mobile phones are set out within the Behaviour Policy and Acceptable Use Policy. Pupils' mobile phones are NOT allowed onto the school site. In exceptional circumstances, where pupils bring mobile phones onto the School site, they must IMMEDIATELY be handed into the office and:

- Devices must be used in accordance with School rules.
- Devices must not be used to photograph, film or record other pupils or staff without permission.
- Devices must not be used to bully, intimidate, harass or exploit others.
- Devices must not be used to access inappropriate content.
- Devices may be searched, confiscated or examined where permitted by law and School procedures.

Any safeguarding concern relating to a pupil's device will be referred immediately to the DSL.

17.8.4 Smart Watches, Smart Glasses and Wearable Technology

To promote safeguarding, protect privacy and reduce online safety risks, pupils are not permitted to wear or use smart watches, smart glasses or other internet-enabled wearable devices whilst on School premises or participating in School activities, unless specifically authorised by the Headmistress for medical or SEND-related reasons.

For the purposes of this policy, prohibited devices include any wearable technology capable of:

- Internet access.
- Messaging.
- Photography or video recording.
- Audio recording.
- Voice communication.
- Social media access.
- Location tracking or sharing.
- Artificial intelligence functions.
- Live streaming.
- Connection to mobile networks or wireless internet services.

Examples include, but are not limited to:

- Apple Watches.
- Samsung Galaxy Watches.
- Google Pixel Watches.
- Fitbit devices with communication functions.
- Meta Smart Glasses.
- Ray-Ban Meta Smart Glasses.
- AI-enabled glasses or wearable devices.

Standard wristwatches which display time only and have no communication, recording or internet-enabled functions are permitted.

Any pupil found using a prohibited wearable device may be required to surrender the device to staff in accordance with the School's Behaviour Policy and safeguarding procedures.

Staff must remain vigilant to the potential safeguarding risks associated with wearable technology, including covert photography, audio recording, online communication, cyberbullying, unauthorised image capture, live streaming and access to harmful content.

Parents and visitors are also not permitted to wear technology whilst on the site that has potential safeguarding risks, including covert photography, audio recording, online communication, unauthorised image capture, live streaming and access to harmful content.

Any safeguarding concern involving a wearable device must be reported immediately to the DSL and recorded on MyConcern.

17.8.5 Photography and Video Recording

Photographs and videos of pupils will normally only be taken using School-owned or School-authorized devices.

Personal devices must not routinely be used to photograph, film or record pupils.

Any accidental capture of School-related images on a personal device must be reported immediately and deleted in accordance with School instructions.

17.8.6 Educational Visits and Residential Visits

Specific arrangements regarding mobile phones and personal devices may be implemented for educational visits, fixtures, performances and residential visits.

Risk assessments will consider:

- Safeguarding.
- Supervision.
- Photography.
- Communication.
- Location sharing.
- Online behaviour.
- Privacy and dignity.

Parents and pupils will be informed of any specific restrictions prior to the activity.

17.8.7 Visitors and Contractors

Visitors, volunteers and contractors must follow School safeguarding expectations regarding mobile phones and personal devices.

No visitor may photograph, film or record pupils without prior authorisation.

Concerns relating to the use of personal devices by visitors must be reported immediately to the DSL or a member of the Senior Leadership Team.

17.8.8 Early Years Foundation Stage

In EYFS settings, personal mobile phones and personal smart devices must not be used whilst staff are responsible for children unless there is an authorised emergency and management approval has been obtained.

Personal devices must be stored securely and out of reach of children throughout the session.

Any exception to this arrangement must be approved by the Headmistress.

17.8.9 Safeguarding Concerns

Any concern regarding:

- Mobile phones,
- Smart watches,

- Social media,
- Online communication,
- Nude or semi-nude image sharing,
- AI-generated imagery,
- Deepfakes,
- Online bullying,
- Grooming,
- Exploitation,

must be reported immediately to the DSL and recorded on MyConcern.

The safeguarding risk takes priority over any disciplinary investigation.

Staff must never view, store, copy, forward or distribute indecent images of children and must follow the School's safeguarding procedures and national guidance.

18. Artificial Intelligence and Emerging Technology

18.1 Principles

AI use must be safe, age-appropriate, transparent, ethical, accountable, data-protection compliant and subject to human oversight.

In line with our commitment to providing a safe digital environment, the School ensures that appropriate filtering and monitoring systems are in place to manage access to artificial intelligence (AI) tools and platforms. These systems are designed to prevent exposure to harmful, inappropriate, or misleading content generated or accessed via AI, in accordance with the Online Safety Act 2023 and current cyber security standards. We recognise the growing use of AI technologies in education and the potential risks they pose, including misinformation, bias, and access to unsafe content. As such, AI-related activity is subject to the same robust safeguards as all other online interactions, and is regularly reviewed to ensure it supports safe, age-appropriate learning.

18.2 Risks

Risks include inaccurate or biased output, harmful content, profiling, personal-data misuse, impersonation, deepfakes, sexualised images, scams, grooming, emotional dependence on chatbots and unsafe health or self-harm advice.

18.3 Approved Use

Staff may use authorised tools only for approved purposes and remain responsible for checking accuracy, suitability, copyright, safeguarding and data protection.

18.4 Confidential Information

Identifiable pupil, family or staff information must not be entered into unauthorised AI tools. Superficial anonymisation is not sufficient where a person remains identifiable.

18.5 Deepfakes and Manipulated Media

Any sexualised or intimate image depicting or appearing to depict a child must be reported to the DSL, whether real, altered or wholly generated. Staff must not circulate or investigate authenticity themselves.

18.6 Chatbots and Companions

Pupils will be taught that AI systems are not people, may be inaccurate or unsafe, should not receive personal information and cannot replace trusted adults or professional support.

18.7 Safeguarding Decisions

AI may support administration but must not determine whether a child is at risk, whether a disclosure is credible or whether a referral or sanction is required.

18.8 Emerging Technology

The School will review risks associated with wearables, virtual reality, location-sharing, livestreaming, connected toys, biometrics, facial recognition, voice cloning and autonomous agents.

19. Children Who Are Questioning Their Gender

19.1 Approach

The School will listen sensitively, take wellbeing and bullying concerns seriously, remain professionally curious and avoid assumptions. Staff must refer requests for changes to the Headmistress and DSL rather than acting independently.

19.2 Assessment

Requests relating to names, pronouns, uniform, facilities, sport, sleeping arrangements or records will be considered individually, taking account of age, development, wishes, family, mental health, bullying, SEND, safeguarding, equality, privacy and impact on other pupils.

19.3 Parents

Parents have the leading role in their child's upbringing and will normally be involved. Information will be withheld only where a safeguarding assessment indicates that disclosure may create a risk of significant harm.

19.4 Names, Pronouns and Records

No person will be sanctioned for an inadvertent mistake. Deliberate bullying or humiliation will be addressed. Official records will normally use the legal name and sex unless a lawful authorised change is made.

19.5 Uniform, Toilets and Changing

Uniform choices available generally may be used. The School will maintain separate facilities required by law and may consider an individual private facility. Privacy, dignity, safety and the rights of all pupils will be protected.

19.6 Sport and Residential Visits

Participation and accommodation decisions will be individually risk assessed, with safety, competitive fairness, privacy and safeguarding taking priority.

19.7 Review

Any support plan will be recorded, identify who needs to know, involve parents where safe and include a review date.

20. Attendance and Children Missing Education

20.1 Safeguarding Significance

Repeated or prolonged absence may indicate neglect, abuse, exploitation, bullying, mental ill-health, family difficulty, radicalisation, FGM, forced marriage or unmet SEND or health needs.

20.2 Daily Response

The School will check messages, contact parents promptly, establish whereabouts, try alternative contacts, consider known risk, inform the DSL and escalate where the child cannot be located.

20.3 Persistent Absence

Patterns, explanations, the child's voice, health, SEND, anxiety, bullying, family circumstances and safeguarding history will be considered. Support, Family Help, local-authority action and statutory referrals may run alongside one another.

20.4 Children with a Social Worker

Concerning absence will be shared with the social worker and considered within Child in Need, Child Protection or care planning.

20.5 Children Missing Education

The School will make reasonable enquiries, cooperate with the local authority, make notifications, avoid unlawful deletion from the admission register and maintain a safeguarding focus.

20.6 Elective Home Education

The DSL will consider the child's circumstances, wishes, SEND and existing concerns, notify the local authority and coordinate with professionals. The School will never encourage removal to avoid attendance, exclusion or safeguarding scrutiny.

20.7 Reduced Timetables

A part-time timetable must be exceptional, temporary, agreed, written, regularly reviewed, have an end date, safeguard the child during time away and move towards full-time education.

20.8 Medical Absence

The School may seek medical information and make reasonable adjustments. Lack of immediate evidence will not prevent proportionate interim support where a credible concern exists. Repeated attendance without essential medication may be an indicator of neglect and require safeguarding assessment.

20.9 Alternative Provision and Off-Site Educational Placements

The School recognises that pupils attending Alternative Provision (AP), specialist placements, commissioned services, part-time provision, outreach programmes or other off-site educational arrangements remain the safeguarding responsibility of Newbridge Preparatory School.

The School will ensure that appropriate safeguarding arrangements are in place before any placement begins and throughout the duration of the placement.

Prior to placement, the School will:

- Undertake due diligence on the provider.
- Obtain evidence of safeguarding policies and procedures.
- Confirm the provider has appropriate safer recruitment arrangements and DBS processes.
- Verify the identity of safeguarding leads and key contacts.
- Ensure attendance, behaviour and safeguarding reporting arrangements are agreed.
- Consider the individual risks, vulnerabilities and needs of the pupil.
- Share relevant safeguarding information proportionately and securely.

The School will not place a pupil in Alternative Provision without being satisfied that safeguarding arrangements are appropriate and effective.

Whilst attending Alternative Provision, the School will:

- Retain overall responsibility for the pupil's welfare and safeguarding.
- Maintain regular communication with the provider.
- Monitor attendance, punctuality, behaviour and welfare.
- Review progress and safeguarding arrangements regularly.
- Ensure safeguarding concerns are reported promptly between all parties.
- Take immediate action where concerns arise about a child's safety or wellbeing.
- Ensure that any Child Protection Plan, Child in Need Plan, Early Help Plan, Risk Assessment or Medical Plan continues to be implemented and reviewed.

The DSL will ensure that safeguarding information is shared with the provider on a need-to-know basis and that confidentiality and data protection requirements are maintained.

Where safeguarding concerns arise whilst a child is attending Alternative Provision, the School and provider will cooperate fully with children's social care, police, health services and other relevant agencies.

The School will ensure that pupils attending Alternative Provision remain visible, heard and supported. Attendance at an external placement will never reduce the School's safeguarding responsibilities.

The DSL will maintain oversight of all pupils attending Alternative Provision and will review arrangements at least termly, or more frequently where safeguarding concerns or vulnerabilities are identified.

Governors will receive anonymised information regarding Alternative Provision placements as part of safeguarding monitoring and assurance activities.

21. Mental Health and Emotional Wellbeing

21.1 Safeguarding Link

Mental health difficulties may arise from abuse or trauma, increase vulnerability and affect behaviour, attendance and learning. Only trained professionals diagnose, but staff must notice, support and refer.

Safeguarding is everyone's responsibility — If in doubt, report it.

21.2 Warning Signs

Possible indicators include marked behavioural change, withdrawal, anxiety, low mood, self-harm, eating changes, hopelessness, preoccupation with death, giving away possessions or searching for suicide-related content.

21.3 Response

Staff should listen without judgement, establish immediate danger, report to the DSL, record accurately and avoid diagnosis, secrecy, minimisation or leaving a high-risk child alone.

21.4 Parents

Parents will normally be involved unless this may increase risk, reveal abuse, lead to punishment or prevent support.

21.5 Emergency

Call 999 following an attempt, overdose, serious injury, immediate plan or inability to keep the child safe. The child must be continuously supervised and must not be sent home unsupported.

21.6 Self-Harm and Suicide

All self-harm concerns must be reported. Direct questions about suicide may be asked calmly to establish risk. Staff must not undertake a clinical assessment.

21.7 Eating Disorders

Restriction, purging, compulsive exercise, marked weight change, collapse or severe distress require prompt DSL and medical consideration.

21.8 Support and Reintegration

Plans may identify a trusted adult, triggers, safe spaces, adjustments, professional support, emergency contacts and review dates. Reintegration after crisis or absence will be sensitive and coordinated.

22. Safer Recruitment

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

22.1 Principles

Safer recruitment includes planning, scrutiny, shortlisting, references, interview, checks, induction, probation and ongoing suitability. Staffing urgency must not weaken procedures.

The School is committed to safeguarding and promoting the welfare of children and expects all staff, volunteers and those working on behalf of the School to share this commitment.

Safer recruitment procedures are designed to deter, identify and reject individuals who may pose a risk to children.

The School will comply with all relevant safeguarding legislation, Keeping Children Safe in Education (KCSIE) 2026, Independent School Standards and statutory safer recruitment requirements.

The School recognises that changes introduced through the Crime and Policing Act 2026 have amended arrangements relating to regulated activity with children. Recruitment decisions, safeguarding checks, deployment arrangements and risk assessments will reflect the current statutory definition of regulated activity.

Safeguarding considerations will remain central throughout recruitment, appointment, induction, supervision and ongoing employment.

22.2 Applications and Shortlisting

The School will require an application form, complete employment history and explanations for gaps. At least two people should shortlist where practicable and at least one should be safer-recruitment trained.

22.3 Online Searches

Publicly available information may be reviewed for safeguarding and suitability concerns. Searches will be proportionate, consistent, documented and discussed with the candidate where relevant.

22.4 Interviews and References

Interviews will explore safeguarding understanding, boundaries, motivation, scenarios and discrepancies. A minimum of two written references will be sought directly, verified and compared with the application. The School will provide appropriate references for current and previous employees when requested, in accordance with statutory requirements.

22.5 Pre-Appointment Checks

Checks may include identity, enhanced DBS, barred list, right to work, qualifications, teaching prohibition, management prohibition, overseas checks, childcare disqualification and medical fitness.

Before an individual commences work, the School will undertake all required safeguarding and suitability checks appropriate to the role.

The School will determine whether a role constitutes regulated activity with children and will apply the appropriate statutory checks.

Checks may include:

- Verification of identity.

- Enhanced DBS certificate.
- Children's Barred List check where the role involves regulated activity.
- Right to work in the United Kingdom.
- Verification of professional qualifications.
- Teaching prohibition check.
- Prohibition from management check where applicable.
- Overseas criminal record checks and additional overseas safeguarding checks where appropriate.
- Childcare disqualification requirements where applicable.
- Verification of employment history and explanation of gaps.
- References obtained and scrutinised before appointment wherever possible.
- Online searches of shortlisted candidates in accordance with statutory guidance.
- Medical fitness declarations where appropriate.

The School will not permit any person barred from working with children to undertake regulated activity.

The School recognises that safeguarding decisions must be based upon the current legal definition of regulated activity and not solely upon job title or perceived levels of supervision.

Early Years Foundation Stage

For persons working or volunteering within the EYFS, the School will comply with the specific suitability and criminal-record checking requirements of the EYFS statutory framework. Every person aged 16 or over who works or volunteers within the EYFS will be subject to the required enhanced criminal-record and Children's Barred List checks. Volunteers will not be permitted to begin working in the EYFS setting until the School has received the volunteer's enhanced DBS certificate, including barred list information.

22.6 Starting Before a DBS arrives

Outside the EYFS, where permitted by legislation and statutory guidance, an individual starting before receipt of a DBS certificate will be exceptional, lawful, authorised and supported by all required checks and a written risk assessment, appropriate barred-list information, supervision and regular review.

Within the EYFS, no person who is required by the EYFS statutory framework to undergo an enhanced criminal-record and Children's Barred List check will begin working or volunteering until the required check has been received.

22.7 Agency Staff, Contractors and Volunteers

The School will obtain written assurances, verify identity, assess regulated activity and supervision, provide induction and retain safeguarding responsibility.

Volunteers, Contractors and Supervision Arrangements

All volunteers, contractors, visiting professionals, peripatetic staff, agency workers and other adults working on behalf of the School will be subject to appropriate safeguarding arrangements determined by the nature of their role and level of contact with children.

The School recognises that changes to regulated activity arrangements require particular consideration of volunteer roles and access to pupils.

Prior to deployment, the School will:

- Verify identity.
- Obtain appropriate safeguarding assurances where relevant.
- Assess the nature of contact with pupils.
- Determine whether the role constitutes regulated activity.
- Complete required safeguarding checks.
- Provide safeguarding induction appropriate to the role.

The School will not rely solely upon supervision arrangements as an alternative to appropriate safer recruitment procedures.

Where adults are supervised, supervision must be clearly planned, proportionate, effective and documented within the School's safeguarding risk assessment process.

The existence of supervision does not remove the School's responsibility to assess safeguarding risk, determine whether regulated activity applies or complete statutory safeguarding checks.

Volunteers and contractors must understand:

- Child protection reporting procedures.
- Staff code of conduct expectations.
- Professional boundaries.
- Whistleblowing arrangements.
- Online safety expectations.
- Procedures for reporting concerns about adults.

The Headmistress and DSL will maintain oversight of arrangements relating to volunteers and visitors and will review associated safeguarding risks regularly.

22.8 Single Central Record

The SCR will contain all required groups and checks, remain accurate and current, be sampled against evidence and receive senior and governance oversight.

The School will maintain a Single Central Record in accordance with statutory requirements and current guidance.

The SCR will contain all required safeguarding information relating to:

- Employees.
- Directors and proprietors.
- Agency and supply staff.
- Volunteer roles where required.
- Contractors where checks are required.
- Trainee teachers and students where applicable.

The SCR will clearly record:

- Identity checks.

- Enhanced DBS checks.
- Children's Barred List checks where required.
- Right to work checks.
- Qualification checks where applicable.
- Teaching prohibition checks.
- Prohibition from management checks.
- Overseas checks.
- Safeguarding assurances from third-party employers.
- Dates checks were completed.

The School will ensure that records accurately reflect current regulated activity determinations and associated safeguarding checks.

The SCR will be formally monitored by the Headmistress, DSL and Nominated Safeguarding Director and sampled regularly against original evidence and personnel records.

Any discrepancy or omission identified will be investigated and rectified immediately.

Any discrepancy identified will be investigated and corrected immediately.

22.9 Ongoing Suitability and Regulated Activity and Risk Assessment

Adults must disclose arrests, cautions, charges, convictions, investigations, safeguarding allegations, regulatory action or other matters that may affect suitability.

The School recognises that regulated activity determinations are an important safeguarding responsibility.

Prior to deployment of any adult working in or on behalf of the School, consideration will be given to:

- The nature of the role.
- Frequency of contact with children.
- Access to vulnerable pupils.
- Residential, educational visit or extracurricular responsibilities.
- Online contact with pupils.
- Statutory guidance and current legal requirements.

Risk assessments will not be used to reduce statutory safeguarding requirements where regulated activity applies.

The School will regularly review recruitment and deployment arrangements to ensure ongoing compliance with legislative changes, KCSIE requirements and safeguarding best practice.

22.10 Induction and Probation

Safeguarding conduct and competence will form part of induction and probation and concerns will be addressed promptly.

23. Safeguarding Concerns and Allegations About Adults

23.1 Harm Threshold

The procedure applies where an adult has harmed or may have harmed a child, possibly committed an offence, behaved in a way indicating risk of harm, or behaved in a way indicating possible unsuitability to work with children.

23.2 Reporting

Concerns must be reported **immediately** to the Headmistress. Concerns about the Headmistress must go directly to the Chair of Directors. Conflicts of interest must be avoided.

In the first instance, this should be recorded on 'My Concern' our online platform for recording concerns – staff concerns:

[Log In - MyConcern](#)

It then should be discussed immediately with the DSL/DDSL (or Chair if regarding the Headmistress).

The Head is the ultimate decision-maker in respect of all low-level concerns.

23.3 Immediate Action

Protect the child, arrange medical attention, preserve evidence, make an initial record and seek LADO advice. Do not investigate, interview in detail, confront the adult or contact parents before advice.

23.4 LADO

The Headmistress or Chair will contact the LADO without delay and normally within one working day, and follow advice about agencies, information, suspension, evidence and process.

23.5 Conduct Outside Work

Domestic abuse, violence, sexual misconduct, online behaviour, extremism, substance misuse or concerns involving the adult's own children may indicate unsuitability.

23.6 Suspension

Suspension is neutral and not automatic. Alternatives will be considered. Reasons for suspension or non-suspension will be recorded.

23.7 Support and Confidentiality

The child and adult will receive appropriate support. Information will be shared only as necessary and public discussion, rumours and social-media publication are prohibited.

23.8 Investigation and Outcomes

External and internal processes will be followed. Outcomes are substantiated, malicious, false, unsubstantiated or unfounded. Resignation does not end safeguarding enquiries.

23.9 Records and References

Clear records will be retained in accordance with guidance. False, unfounded, unsubstantiated or malicious allegations will not be included in references.

24. Low-Level Concerns

24.1 Definition

A low-level concern is any concern, however small, that an adult may have acted inconsistently with the Staff Code of Conduct but the behaviour does not appear to meet the harm threshold.

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

24.2 Examples

Examples include overfriendliness, favouritism, unnecessary one-to-one contact, personal messaging, inappropriate language or contact, use of personal devices, poor boundaries, unauthorised transport or conduct causing unease.

24.3 Reporting and Self-Referral

All concerns must be reported promptly to the Headmistress, or Chair where they concern the Headmistress. Adults are encouraged to self-refer situations that could be misinterpreted or involved poor judgement.

24.4 Response

The Headmistress will establish facts, consider context and previous concerns, decide action and seek LADO advice where uncertain.

24.5 Records and Patterns

Concerns, context, action, decisions and rationale will be recorded securely. Records will be reviewed for patterns, cultural issues, training needs and escalation to the harm threshold.

25. Whistleblowing

25.1 Duty to Speak Up

Adults must raise concerns about unsafe, unlawful or inappropriate practice, including mishandled safeguarding, falsified records, incomplete checks, intimidation, concealment or senior failure to act.

25.2 Routes

Concerns may be raised with the Headmistress, DSL, Chair, Nominated Safeguarding Director or external agencies where internal arrangements are compromised.

25.3 Protection

The School will not tolerate victimisation of a person who raises a genuine concern in good faith. Knowingly malicious allegations may be addressed under disciplinary procedures.

26. Referrals to the Disclosure and Barring Service

26.1 Duty

The School will refer where it removes a person from regulated activity because they harmed or pose a risk of harm, or would have removed them had they not left.

26.2 Responsibility

The School will not assume another agency or employer will make the referral. Failure to refer where required may be a criminal offence.

26.3 Departure

Resignation, retirement, redundancy or settlement does not remove referral duties.

27. Referrals to the Teaching Regulation Agency (Check a teacher's record)

27.1 Consideration

Where a teacher is dismissed for serious misconduct, or would have been dismissed had they not resigned, the School will consider TRA referral.

27.2 Serious Misconduct

Relevant matters may include safeguarding misconduct, sexual misconduct, serious violence, dishonesty, serious boundary breaches, serious offending or conduct undermining public confidence.

27.3 Separate Duties

DBS and TRA referrals serve different purposes and both will be made where both thresholds are met.

28. Learning from Concerns and Allegations

28.1 Review

At the conclusion of a concern, the School will consider policy clarity, reporting, earlier warning signs, supervision, boundaries, recruitment, training, premises, technology, agency communication and culture.

28.2 Improvement

Learning will inform policy, training, induction, supervision, risk assessment, recruitment, leadership and governance.

29. Safeguarding Training

Induction and training are in line with advice from Wolverhampton's Safeguarding Together (The City of Wolverhampton Council, West Midlands Police and The NHS Black Country Integrated Care Board.) Training can be booked using this link:

<https://www.wolverhamptionsafeguarding.org.uk/training>

29.1 Induction

All new staff, including temporary and supply staff, will receive safeguarding induction covering policies, DSLs, MyConcern, adult concerns, online safety, filtering and monitoring, conduct, confidentiality, security and emergency procedures.

Induction will include guidance on regulated activity, safer working practice, professional boundaries, supervision arrangements, volunteer expectations and safeguarding responsibilities for all adults working in or on behalf of the School.

29.2 KCSIE

All staff, including those who do not work directly with children, will read Part One of Keeping Children Safe in Education 2026 and confirm their understanding.

29.3 Updates

Comprehensive training will normally take place annually, with regular updates and immediate briefings where necessary.

29.4 DSL and Role-Specific Training

DSLs and DDSLs will undertake formal training at least every two years and refresh knowledge at least annually. Additional training will be provided for Directors, SENCO, attendance, Early Years, recruitment, IT and other specialist roles.

29.5 Records

Training records will show the individual, role, course, provider, date, renewal and KCSIE confirmation.

30. Safeguarding Culture

30.1 Expectations

The School will maintain a culture in which children are listened to, concerns are reported, professional curiosity is welcomed, adults are open to challenge and poor practice is addressed. The School will promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.

30.2 Professional Curiosity

Staff will notice changes, ask appropriate open questions, consider patterns, check consistency, think about the child's lived experience and follow up unresolved concerns.

30.3 Respectful Uncertainty

Apparent certainty from a child, parent or professional must not close down enquiry where information conflicts, concerns repeat or the child's presentation does not fit the explanation.

30.4 Normalised Behaviour

Sexualised language, prejudice, humiliation, coercion, bullying, harmful jokes and adult boundary breaches will be challenged.

30.5 Staff Support

Staff involved in difficult safeguarding work will have access to consultation, debriefing and appropriate professional support while maintaining confidentiality.

31. The Safeguarding Curriculum

31.1 Delivery

Safeguarding education will be delivered through PSHE, Relationships Education, Computing, assemblies, pastoral work, science, PE, visiting speakers and responsive teaching.

31.2 Themes

Age-appropriate teaching will cover trusted adults, body boundaries, consent, safe and unsafe secrets, bullying, discrimination, online safety, grooming, image sharing, scams, misinformation, AI, mental health, exploitation and emergency help. Also, violence against women and girls (VAWG), misogyny, sexism, equality and respectful relationships.

31.3 Early Years

Young children will learn to identify trusted adults, name feelings, understand personal space and private body parts, ask for help and use technology safely.

31.4 Speak Out Stay Safe and Buddy

The School may use NSPCC Speak Out Stay Safe and Buddy resources. Any disclosure arising from a session must be reported immediately.

31.5 Reporting and Review

Children will have several reporting routes. Pupil voice and safeguarding data will be used to review curriculum effectiveness and accessibility.

32. Site Security and School Premises

32.1 Access

Entry points will be controlled, visitors will report to Reception, unidentified adults will be challenged and arrangements for events and out-of-hours access will be reviewed.

32.2 Collection

Children will be released only to authorised adults or arrangements. Identity, passwords or direct parental verification may be required. Concerns about impairment, fear or court restrictions will be escalated.

32.3 Missing Child

The School will alert senior staff and the DSL, search safely, check records, contact parents, call police promptly where risk remains, record actions and review the incident. (See Missing Child Policy)

32.4 One-to-One Work

Sessions will be transparent and appropriately overseen through suitable rooms, awareness, timetabling, recording and professional boundaries.

32.5 Changing, Sport and Visits

Supervision will protect dignity and privacy. Educational and residential visits will address checks, ratios, transport, accommodation, medical needs, devices, emergencies and child-specific plans.

32.6 Lettings

External organisations using the premises must have suitable safeguarding arrangements and cooperate with School and statutory procedures.

33. Photography, Video and Images

33.1 School Use

Images will normally be taken on School-owned or authorised devices, stored securely, used for legitimate purposes and retained only as required.

33.2 Events

Parent photography may be permitted subject to announced rules and may be restricted where safeguarding, legal or privacy concerns apply.

33.3 Misuse

Covert, humiliating, sexualised, manipulated, livestreamed or unauthorised images must be reported to the DSL. Personal staff devices must not routinely be used to photograph pupils.

34. Physical Contact, Reasonable Force and Restraint

34.1 Principles

Physical contact may be appropriate for comfort, first aid, care, instruction or preventing harm, but must never be punitive, humiliating, sexual, threatening or excessive.

34.2 Reasonable Force

Force may be used lawfully to prevent injury, offence, property damage or serious disruption and must be necessary, proportionate and stopped when the risk passes. (SEE Reasonable Force POLICY)

34.3 Plans

Where intervention is foreseeable, an individual plan should identify triggers, prevention, de-escalation, communication, authorised staff, medical considerations and review.

34.4 Recording

Significant interventions will be reported and recorded, including circumstances, de-escalation, duration, injury, child's account, parents and follow-up.

35. Intimate and Personal Care

35.1 Dignity and Safety

Care will protect dignity, privacy, safety, communication, independence and choice. Staff will explain actions, seek cooperation, follow hygiene arrangements and maintain boundaries.

35.2 Accountability

Plans may identify authorised staff, room arrangements, recording and parental communication. Two adults are not automatically required for every care task.

35.3 Concerns

Injuries, distress, disclosures or unusual presentation during care must be reported immediately. (See Intimate and Personal Care Policy)

36. First Aid, Medication and Medical Concerns

36.1 Safeguarding Awareness

First-aid and medical records may reveal unexplained injury, neglect, fabricated illness, self-harm, inappropriate medication or repeated concerning presentation and must be shared with the DSL where relevant.

36.2 Medical Evidence

The School will seek clinical information where available but will not dismiss a credible known or suspected medical or allergy risk while written confirmation is awaited.

36.3 Interim Measures

Proportionate interim arrangements, healthcare advice, parental information and review will be used where necessary.

(See First Aid, Medication and Allergy Policies)

37. Governance and Oversight

37.1 Board Responsibility

The Board has overall responsibility for effective safeguarding and will consider it across leadership, staffing, curriculum, premises, online safety, risk, finance, data protection, visits, lettings and Early Years.

37.2 Nominated Safeguarding Director

The nominated Director will meet the DSL, review policy, training, audit, trends, online safety, recruitment and the SCR, and provide support and challenge without becoming the operational DSL.

Review the School's mobile phone, smart technology, filtering and monitoring arrangements at least annually.

37.3 Reports

The DSL will report at least termly on concerns, referrals, Family Help, attendance, child-on-child abuse, online safety, adults, training, audits and actions, normally using anonymised information.

37.4 Annual Review and Testing

The Board will review policy and practice annually and may sample records, training, recruitment files, the SCR, filtering reports, staff and pupil understanding and site security. The Board will sample Alternative Provision safeguarding arrangements, attendance monitoring and information-sharing processes.

38. Monitoring and Review of this Policy

38.1 Frequency

The policy will be reviewed at least annually and sooner following statutory change, serious incident, local-procedure change, audit weakness or material change in technology or practice.

38.2 Responsibility

The DSL and Headmistress lead operational review; the Board approves and assures implementation.

38.3 Publication

The current policy will be available to staff, parents, inspectors and agencies and published on the School website.

38.4 Associated Policies

This policy should be read with the Staff Code of Conduct, Behaviour, Anti-Bullying, Attendance, Online Safety, Acceptable Use, Data Protection, Whistleblowing, Complaints, Health and Safety, First Aid, Allergy, Visits, Reasonable Force, Intimate Care, SEND, Mental Health, Early Years, Photography, Recruitment and Risk Assessment policies.

Written 31/07/2026 NBB

Updated 03/09/2026

APPENDICES

The following operational appendices form part of this policy. Names, telephone numbers, email addresses and local referral routes must be checked before approval and at least termly thereafter.

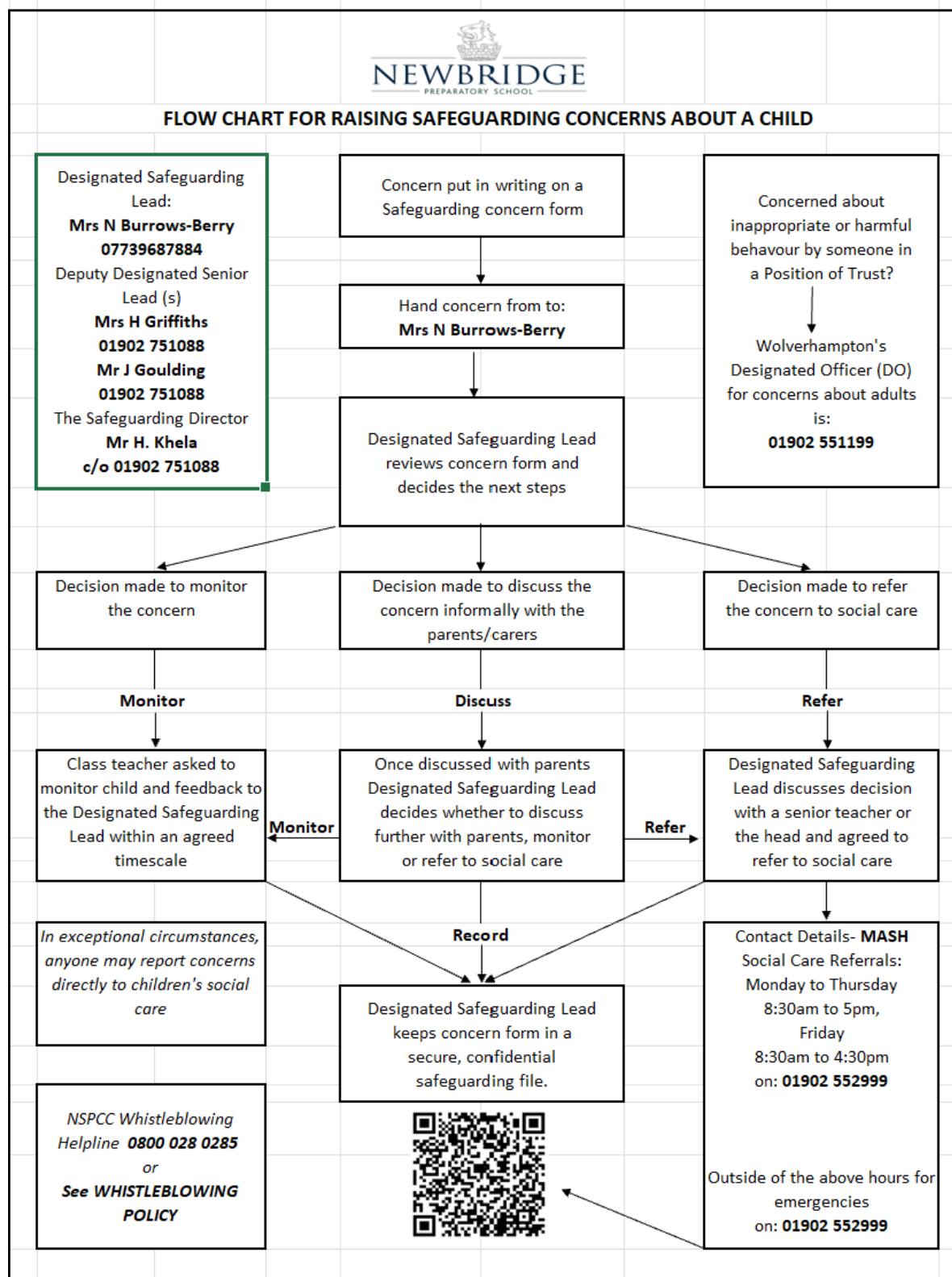
Appendix 1 — Immediate Safeguarding Responses:

- Immediate danger: protect the child, call 999, inform the DSL, remain with the child where appropriate, preserve evidence and record.
- Disclosure: listen, remain calm, take seriously, use open prompts, explain information must be shared, record exact words and report immediately.
- Do not promise confidentiality, investigate, ask leading questions, criticise the alleged perpetrator or contact parents before DSL advice.

Reporting Through MyConcern [Log In - MyConcern](#)

- Record on the same working day; urgent concerns must also be spoken directly to the DSL.
- Include date, time, location, people present, exact words, factual observations, injuries, immediate action and who was informed.
- Distinguish direct observation, child's account, third-party information and professional opinion.
- The DSL records assessment, decisions, referrals, parental contact, advice, support, review and outcome.

Flowchart For Raising A Concern



Pol 1.0 Regulatory 2024-2025 Safeguarding Flow Chart edited.docx

Body Map

- Record child, date, time, staff member, location, size, shape, colour, type of injury, child's words, first aid and DSL notification.
- A body map records observation; it is not a diagnosis. Do not require exposure of intimate areas.

Children's Social Care

- Refer where there is reasonable cause to suspect significant harm or a need for statutory protection. Do not wait for proof.
- Provide available identifying, household, concern, history, vulnerability, action, parental-awareness and immediate-safety information.
- Record recipient, time, advice and next steps; follow up, escalate if necessary and continue supporting the child.

Family Help Procedure

- Identify need, listen to the child, discuss with parents where safe, seek consent where required, assess, coordinate actions and set review dates.
- Escalate where circumstances do not improve or risk increases. Refusal of voluntary help does not prevent statutory action.

Attendance Safeguarding Escalation

- On unexplained absence, check messages, contact primary and alternative contacts, establish whereabouts, inform the DSL and escalate where necessary.
- Immediate DSL review is required for children with social workers, known abuse or exploitation risks, conflicting explanations, unknown whereabouts or sudden family movement.
- Persistent absence must be reviewed alongside safeguarding records, medical information, SEND, bullying, family circumstances and online risk.

Child-on-Child Abuse Response

- Prioritise safety, medical needs, separation, evidence, police/social-care advice, parental contact and risks to other pupils.
- Assess needs of the child who experienced harm, the child alleged to have caused harm and the wider peer group.
- Possible arrangements include separate groups, supervised transitions, online-contact restrictions, trusted-adult checks and safety plans.

Nude and Semi-Nude Image Incidents

- Report immediately. Staff must not ask to see, save, screenshot, forward, print, upload or ask a child to delete an image.
- The DSL assesses age, consent, coercion, adult involvement, distribution, manipulation, blackmail, self-harm and police requirements.
- • Consider financially motivated sexual extortion (FMSE), blackmail and demands for money.

Online Safety Incident Response

- Protect the child, avoid unnecessary viewing, preserve evidence, report to the DSL, secure systems and record.
- Consider police, social care, parents, platforms, account security, removal, support, sanctions, data protection and technical changes.
- Filtering failures must be reported to the DSL and technical lead and resolved promptly.

Mental Health and Self-Harm Response

- Ask direct safety questions where appropriate, report immediately and do not undertake clinical assessment.
- Call 999 for attempt, overdose, serious injury, immediate plan or inability to remain safe; maintain continuous supervision.
- Safety plans may include warning signs, triggers, strategies, adults, safe spaces, hazards, professional support and review dates.
- A child at serious risk must never be left alone in a Calm Room.

Concerns About Staff and Adults

- Harm-threshold concerns go immediately to the Headmistress, or Chair where the concern is about the Headmistress.
- Low-level concerns include overfamiliarity, favouritism, poor boundaries, inappropriate language/contact, personal messaging or personal-device use.
- Do not investigate or confront the adult.

Managing Allegations Against Adults

- Safeguard the child, make an initial record, contact the LADO, follow agency advice, consider parents and suspension, support all parties, maintain confidentiality, consider DBS/TRA and review learning.
- Resignation does not end the process.

Operation Encompass

- Record notifications securely, consider presentation, share only as necessary, offer discreet support, avoid unnecessary questioning and monitor wellbeing.
- Do not discuss with parents without considering safeguarding advice.

Prevent and Radicalisation

- Report concerns to the DSL. Consider context, age, online activity, influence, behavioural change, extremist content, travel, violence and vulnerability.
- Possible responses include pastoral work, parents where safe, Prevent advice, Family Help, social care, Channel or police.

FGM Mandatory Reporting

- A teacher who discovers that FGM appears to have been carried out on a girl under 18 must personally call 101 and inform the DSL.
- Suspected or planned FGM must be reported to the DSL for normal safeguarding referral.

Forced Marriage and Honour-Based Abuse

- Report immediately, establish safety, do not contact family or mediate, do not send the child home without assessment, seek specialist advice and record travel or ceremony information.

Private Fostering

- Inform the DSL where a child under 16, or under 18 if disabled, may live for 28 days or more with someone who is not a parent, person with parental responsibility or close relative.
- The DSL must establish the arrangement and notify children's social care where required.

Early Years Safeguarding And Welfare Requirements / Arrangements

Every person looking after children within the EYFS must remain alert to safeguarding concerns and must follow the School's procedures for recognising, recording and reporting concerns.

The School will maintain staffing arrangements which meet the statutory staff:child ratios. Ratios will be considered across the whole EYFS provision and not solely on a room-by-room basis, while ensuring that children are appropriately supervised at all times.

When EYFS children are taken on outings, staffing and risk-assessment arrangements will ensure that the statutory paediatric first-aid requirements are met and that an appropriately qualified paediatric first aider accompanies the group.

The School will comply with EYFS suitability and disqualification requirements. Relevant persons must inform the School of any circumstances that may affect their suitability, including arrests, charges, cautions, convictions, orders, determinations or other matters specified within the statutory framework. Where childcare disqualification provisions apply, the School will follow the statutory requirements, including any applicable disqualification-by-association and Ofsted waiver arrangements.

The school will:

- Maintain appropriate ratios, supervision, collection, outdoor, toileting, mobile-phone, camera, first-aid, attendance, allergy, food, allegation and whistleblowing arrangements.
- Personal phones and cameras must not be used while staff are responsible for children except under an authorised emergency arrangement.
- Unexplained absence of very young children must be followed up promptly.

Holiday Club and Wraparound Provision

- This policy applies fully. The lead must maintain registers, contacts, medical information, collection, staffing, DSL access, records, premises security, first aid and missing-child procedures.
- Staff conduct concerns must be reported immediately and operational staffing pressure must not override safeguarding.

Educational Visits Checklist

- Confirm risk assessment, staffing, checks, contacts, medical information, medication, transport, collection, missing-child response, devices, photography, toilets, accommodation, night supervision and DSL access.

Appendix 2 - Pupil-Friendly Safeguarding Message

- You have the right to feel safe. Tell an adult if someone hurts, frightens, threatens, touches, messages or asks you for images; if home or online worries you; or if you feel like hurting yourself.

- You can speak to any trusted adult, the DSL, a DDSL, a parent or Childline. You will not be in trouble for telling. Keep telling until someone helps.

NSPCC Speak Out Stay Safe and Buddy Safeguarding Message

- Key messages: every child has the right to feel safe; abuse is never the child's fault; speak to a trusted adult; keep speaking until helped; Childline is available.
- Any disclosure during or after a session must be reported immediately.
- B — Be Brave. U — Understand it is not your fault. D — Don't keep unsafe secrets. D — Do tell a trusted adult. Y — You have the right to feel safe.

Appendix 3 - Safeguarding File Transfer

- Confirm the receiving DSL, review the file, identify urgent information and use a secure auditable method separate from general records.
- Record pupil, destination, recipient, date, method, sender, receipt and verbal handover.
- Incoming files must be reviewed promptly and immediate arrangements made.

Appendix 4 - Records and Retention

- Records must be accurate, contemporaneous, secure, confidential, accessible only to authorised staff and retained under the School's schedule.
- Retention arrangements must cover child files, adult allegations, low-level concerns, recruitment, training, first aid, attendance and online incidents.
- Insurance Addendum - All communications about any safeguarding complaint received will be retained for 25 years.

Appendix 5 - DSL Case-Review Checklist

- Review current safety, child's voice, parents, records, chronology, patterns, attendance, siblings, online risk, social worker, information sharing, Family Help, referral, professional challenge, safety plan, staff knowledge, outcomes and review date.
- Do not close solely because there has been no recent incident.

Appendix 6 - Termly Safeguarding Audit

- Review policy and contacts; training and KCSIE; SCR and recruitment files; recording, referrals, Family Help, attendance and transfers; allegations and low-level concerns; filtering and monitoring; premises; curriculum and pupil voice; governance actions. • Review mobile phone, smart device and wearable technology procedures and incidents.

Appendix 7 - Termly Safeguarding Report to Directors

- Include anonymised data and analysis on concerns, referrals, Family Help, police, Prevent, child-on-child abuse, online safety, mental health, attendance, social workers, adult concerns, LADO, DBS/TRA, training, recruitment, filtering, curriculum, pupil voice, strengths, weaknesses and priorities.

Appendix 8 - Safeguarding Induction Checklist

- Confirm receipt and understanding of this policy, KCSIE Part One, Staff Code, Behaviour, attendance, DSLs, MyConcern, disclosures, adult concerns, low-level concerns, whistleblowing, online safety, filtering, devices, photography, security, visitors, collection, missing child, force, intimate care, first aid, Prevent and emergency contacts.

Appendix 9



Annual Staff Compliance Declaration

(to be signed each September)

Name:

I confirm that I have read, understood, and will comply with the following responsibilities:

Safeguarding & Child Protection

- ☐ I have reviewed the Staff Handbook and the latest version of Keeping Children Safe in Education (Part 1).
- ☐ I understand how to record and share a safeguarding concern, and I know the school's DSL and deputies.
- ☐ I understand that safeguarding is everyone's responsibility and I must report concerns immediately without promising confidentiality.

Health & Safety

- ☐ I have completed risk assessments relevant to my responsibilities, working spaces, and activities I lead.
- ☐ I understand I must update risk assessments when needed and have read those relevant to the spaces I work in.
- ☐ I understand my responsibility to report health and safety concerns to the appropriate staff.
- ☐ I am familiar with fire safety, evacuation procedures, first aid arrangements, and accident reporting.
- ☐ I will ensure pupils are appropriately supervised at all times.

Behaviour & Pupil Welfare

- ☐ I have reviewed the Behaviour Policy and understand my role in supporting it through consistent use of rewards and consequences.
- ☐ I am aware of pupils' medical or care plans relevant to my area of responsibility.

Data Protection & Confidentiality

- ☐ I understand my responsibilities under GDPR and the school's Data Protection Policy, including safe handling of personal data.
- ☐ I will maintain professional confidentiality at all times.

Professional Conduct

- ☐ I have reviewed the Code of Conduct/Staff Behaviour Policy and understand expectations, including social media use.
- ☐ I understand the Whistleblowing Policy and know how to raise concerns about poor practice or non-compliance.

- ☐ I am aware of my duties under the Prevent Duty and how to raise concerns.
- ☐ I will notify the main office if my personal details (address, phone number, emergency contacts) change.

Signed: _____ Date: _____

Appendix 10 - Checklist for Staff

Keeping Children Safe in Education 2026



Part 1: Safeguarding information for all staff



Safeguarding is everyone's responsibility.

Every member of staff plays a vital role in keeping children safe and promoting their welfare. A child-centred approach should underpin all decisions and actions.

What every member of staff should know

All staff must:

- ✓ Understand the school's safeguarding systems and policies.
- ✓ Know who the Designated Safeguarding Lead (DSL) and Deputy DSLs are.
- ✓ Receive safeguarding and online safety training.
- ✓ Be aware of how to report concerns and seek advice.

If a child shares a concern:

LISTEN

Listen carefully.
Take what they say seriously.

REASSURE

Reassure them they have done the right thing.
Never promise confidentiality.

REPORT

Report concerns immediately.

Remember:

Children may not always be ready or able to tell someone they are being harmed.

Be alert to vulnerability

Some children may need additional support, including those who:

- Have SEND or disabilities.
- Experience mental health difficulties.
- Are young carers.
- Go missing from education.
- Are vulnerable to exploitation or criminal activity.
- Experience domestic abuse or family challenges.

To learn more
scan to go to our briefing or
to listen to our Audiobook
versions of Part 1 and Annex B
Just scan the QR codes.



Our briefing



Our audiobook



Recognise the signs of harm

Staff should understand the four main categories of abuse:

01

Physical Abuse

02

Emotional Abuse

03

Sexual Abuse

04

Neglect

Safeguarding concerns can occur both online and offline and may involve multiple forms of harm at the same time.

Key Risks staff should know about

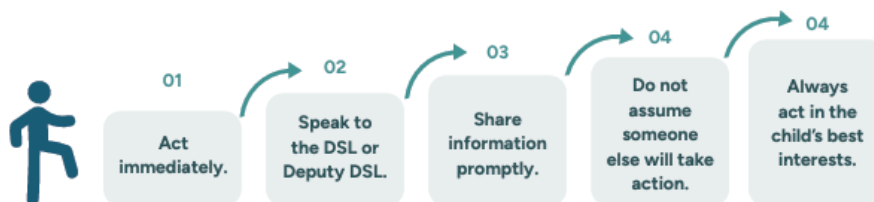
- Child-on-child abuse.
- Child criminal exploitation (CCE).
- Child sexual exploitation (CSE).
- Domestic abuse.
- Female Genital Mutilation (FGM).
- Serious violence.
- Online safety and AI concerns.
- Mental health concerns linked to safeguarding.

If you have a concern

Adopt the mindset:

“It could happen here.”

If you are worried about a child:



Record and Share

Good safeguarding relies on:

- Clear and factual recording.
- Timely information sharing.
- Secure storage of records.
- Professional curiosity and follow-up.

Concerns about adults

All staff should know how to report – through their low level concerns and whistleblowing procedures:

- Concerns about colleagues.
- Unsafe practice.
- Low-level concerns.
- Safeguarding failures within the organisation.

Key Messages to Remember

- ✓ Safeguarding is everyone's responsibility.
- ✓ Always put the child first.
- ✓ Listen, reassure, report and record.
- ✓ Be professionally curious.
- ✓ Recognise signs of abuse, neglect and exploitation.
- ✓ Share concerns immediately.
- ✓ Keep accurate records.
- ✓ Speak to the DSL if you are unsure.
- ✓ Remember: It could happen here.

Read the full guidance: <https://www.gov.uk/government/publications/keeping-children-safe-in-education>