



Alleyne's School Policies & Procedures

Safeguarding and Child Protection Policy

Name of Policy	Safeguarding and Child Protection Policy
ISSR	Part 3: Welfare, Health and Safety of Pupils and other legislation
Reviewed by	Alleyne's Governing Board
Author/SLT	Mrs MA Joel, Designated Safeguarding Lead
Date of school review	September 2025
Date of next school review	September 2026

Policy Overview

This policy applies to both the Junior and Senior Schools. It includes those pupils in the Early Years Foundation Stage (EYFS). The policy is applicable to all on and off-site activities undertaken by pupils while they are the responsibility of the School. This policy pays regard to statutory guidance as published by the Department for Education in particular in *Working Together to Safeguard Children (2023 updated June 2025)* and *Keeping Children Safe in Education (2025)*.

In *Keeping Children Safe in Education (2025)* safeguarding is defined as:

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

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1. APPLICATION

This policy applies to all pupils of Alleyn's School, including those pupils in the Early Years Foundation Stage (EYFS). It applies to all members of staff and volunteers and is applicable whenever pupils are the responsibility of the School, including when activities take place off site.

When the word 'staff' is used this includes all members of staff including governors, self-employed staff, contractors, volunteers, students and those on work experience.

This policy is kept up to date in response to emerging/evolving issues or lessons learnt. It is published on the School's website and printed copies are also available to parents on request. An 'Alleyn's Post' with a link to this policy is sent at the start of the academic year to all parents and explains where to find the policy.

2. KEY SCHOOL PERSONNEL

Role & area of responsibility	Name	Title	Contact details
Designated Safeguarding Lead (DSL) whole school Prevent Lead whole school	MEL JOEL	Assistant Head, Safeguarding and DSL Member of SLT	safeguarding@alleyns.org.uk 0208 557 1487 Office is 1st floor EAB
DDSL Senior School	ALEX SMITH	Assistant Head, Head of Upper School Member of SLT	safeguarding@alleyns.org.uk 0208 557 1485 Office is on the first floor of the EAB, opposite to the sectional administrators' office
DDSL Senior School	LEWIS GELDEARD	Director of Middle School	safeguarding@alleyns.org.uk 0208 557 1502 Office is on the first floor of the EAB, next to the sectional administrators' office
DDSL Senior School	HELEN LAWRENCE	Assistant Head, Head of Lower School Member of SLT	safeguarding@alleyns.org.uk 0208 299 8032 LS Office is in the LS building, first floor
DDSL Junior School (Reception to Year 6) including specific responsibility for EYFS pupils	SIMON SEVERINO	Head, Alleyn's Junior School Member of SLT	jssafeguarding@alleyns.org.uk 0208 557 1495 Office is located next to the reception area in the Junior School Rose Building
DDSL Junior School (Reception to Year 6)	ERICA OLLEY	Deputy Head, Alleyn's Junior School	jssafeguarding@alleyns.org.uk 0208 557 1536 Office is located next to the reception area in the Junior School Rose Building
DDSL Commercial Enterprises	OLI WATKINS	Co-Commercial Director	safeguardinglink@alleyns.org.uk 020 8557 1557
Link Governor for Safeguarding Whole School, including those pupils in the EYFS	DIANNE BARRATT	Governor	Can be contacted via the Clerk to the Governors, Alleyn's School, Townley Road, Dulwich, London SE22 8SU at Clerk@alleyns.org.uk .
Trained to DDSL level	GAVIN ENGLISH	Deputy Head, Pastoral (Senior School)	safeguarding@alleyns.org.uk 020 8299 8025
Trained to DDSL level	SAM MADDEN	Senior Deputy Head	safeguarding@alleyns.org.uk 020 8299 8025
Trained to DDSL level	RACHEL LUMSDEN	PA to the DSL	safeguarding@alleyns.org.uk 0208 299 8025

The Chair of Governors is **Mr Chris Stylianou**. The Vice-Chair is **Mr Charles Barclay (Advent Term)** and **Mrs Justine Voisin from Lent term 2026**. They may be contacted c/o Clerk to the Governors, Alleyn's School, Townley Road, Dulwich, London SE22 8SU at Clerk@alleyns.org.uk.

3. KEY PERSONNEL - EXTERNAL AGENCIES

The School is located in Southwark and follows the guidance of Southwark Local Safeguarding Children Partnership (LSCP), which operates within the guidance and procedures of the wider Pan London Safeguarding Children's Partnership.

Pupils live in a number of different boroughs and for any concerns regarding pupils the School would usually contact the Children's Services Department of the borough in which the pupil resides.

Concerns relating to the conduct of staff will always be referred to the LADO for Southwark.

It is the policy of the School that referrals about pupils are made by the DSL; however, anyone may make a referral and staff may raise concerns directly with Children's Services. If there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services immediately or by calling the police on 999.

Title	Name	Purpose	Contact details
Southwark Multi- Agency Safeguarding Hub (MASH)	Duty worker	For concerns about a pupil	020 7525 1921 Out of hours: 0207 525 5000 mash@southwark.gov.uk
Southwark Schools Safeguarding Coordinator	Apo Cagirci	Advice for schools and Schools Safeguarding Coordinator	020 7525 2715
Local Authority Designated Officer (LADO)	Eva Simcock	For concerns about an adult relating to their work with children	020 7525 0689 Eva.Simcock@southwark.gov.uk Head of Social Work Improvement and Quality Assurance, Sumner House, Sumner Road, London SE15 5QS
Children's Social Care Services	Duty worker	For concerns at any stage unable to be dealt with by the offices above	From 9am-5pm: 020 7525 1921 Out of hours: 020 7525 5000
Early Help service	Duty worker	For concerns that may not require referral, but meetings or mediation	020 7525 2714 EarlyHelp@southwark.gov.uk
Southwark Safeguarding Children Partnership	Chair: Anna Berry	For information on safeguarding children in Southwark	020 7525 3306 Southwark Safeguarding Children Partnership/ Southwark Safeguarding Adults Board, PO Box 64529, SE1P 5LX sscp@southwark.gov.uk http://safeguarding.southwark.gov.uk/southwark-safeguarding-board//

Other external referral and advice contacts:

Metropolitan Police	Child Abuse Investigation Team	020 7230 3700
Prevent Duty	Department for Education helpline	020 7340 7264
Forced Marriage Unit	Advice for staff	020 7008 0151
CAMHS	Duty practitioner for mental health	020 3228 6000/7777
SLAM (CAMHS in Southwark)	Mental health crisis number	0800 731 2864
Mental Health out of hours	24-hour coverage for concerns	0800 731 2864
NSPCC Child Protection Helpline	24-hour freephone service for adults, children or young people for advice or to give details about a child who may be at risk	0808 800 5000
ChildLine	24-hour freephone for children and young people who need advice	0800 1111
Family Lives	A freephone advice line for parents	0808 800 2222
NSPCC whistleblowing helpline	Available for staff who do not feel able to raise concerns regarding child protection failures internally	0800 028 0285 help@nspcc.org.uk
Protect whistleblowing helpline	Charity offering confidential advice to staff to help them understand their options and rights about raising concerns in the workplace.	020 3117 2520 https://protect.tfaforms.net/f/Contact-the-Advice-Line

4. LEGAL FRAMEWORK

This policy pays due regard to:

- DfE statutory guidance *Keeping Children Safe in Education* (2025)
- Guidance in *Working Together to Safeguard Children* (2023 updated June 2025)
- London Safeguarding Children Procedures and Practice Guidance (updated March 2025)
- Guidance from the local authority: Southwark Safeguarding Children Partnership (SSCP)
- Prevent Duty Guidance for England and Wales (revised December 2023)
- Statutory Framework for the Early Years Foundation Stage (2025)

A full list of all documents and guidance informing this policy may be found in Appendix 3.

4.1 Links with other school policies

Safeguarding and the well-being of pupils permeates all aspects of school life and this policy links to many other

policies in the Senior (SS) and Junior (AJS) Schools. These include, but are not limited to:

- Pupils' Social Emotional Wellbeing and Mental Health Policy (SS)
- Missing child
- IT and E-safety (SS)/Online safety (AJS) and Acceptable Use Agreements for staff and pupils
- AI policy
- Pupil Code of Conduct/Golden Rules (AJS)
- Staff Code of Conduct (AJS)/ Staff Code of Conduct (SS)
- Anti-bullying and Harmful Peer Relations
- Educational Visits
- Use of Physical Force/Restraints (SS and AJS)
- Complaints
- Whistleblowing
- Equal Opportunities
- Rewards and Sanctions/Recognition (AJS)
- Exclusion
- Recruitment
- New staff induction
- First Aid
- Health and Safety
- RSE Policy
- Third Party Hire, Safeguarding & Child Protection Policy

5. POLICY STATEMENT AND AIMS

Alleyn's School fully recognises its responsibility to safeguard and promote the welfare of its pupils. It endeavours to ensure that all pupils are protected from any form of abuse or neglect, including abuse through the use of technology. The School is particularly aware of the vulnerability of certain groups including those with Special Educational Needs and Disabilities.

The School promotes a climate of openness where anyone in the community can share their concerns freely, and it supports the personal development of pupils in order to foster security, confidence and independence. It acknowledges that safeguarding incidents can happen within or outside the home, indeed, anywhere and that everyone in the staff community must take responsibility for safeguarding, ensuring that they *always act in the best interests of the child*.

6. CORE PRINCIPLES

- The welfare, well-being and safety of pupils is at the heart of the School and is always afforded the highest priority.
- The School protects all pupils regardless of age, gender, ability, disability, race, language, ethnicity, religion or sexual identity.
- The School actively promotes a culture of openness where all members of the School community, both staff and pupils, are able to raise concerns with the confidence that they will be listened to and taken seriously.
- All staff, both teaching and non-teaching, have an equal responsibility to report any concerns they may have about a pupil or about the conduct of another member of staff, and that they must adopt an 'it could happen here' attitude.
- There are clear processes in place to identify, assess, and support pupils.
- The School is committed to inter-agency working, as detailed in *Working Together to Safeguard Children* (2023 updated June 2025), and will liaise closely with other agencies. This includes Children's Services, the Local

Authority Designated Officer (LADO), the police, health and mental health services and any other agencies which may be involved with its pupils.

- The curriculum and co-curriculum give pupils opportunities to develop the knowledge and personal skills needed to recognise and stay safe from abuse, including abuse and exploitation through the use of technology.
- Appropriate filtering and monitoring systems are in place to minimise risks to pupils online, and respond to emerging online safety issues, such as generative artificial intelligent (AI), disinformation, misinformation and conspiracy theories.
- Safer recruitment procedures are practised in accordance with the requirements of *KCSIE (2025)* and *Disqualification under the Childcare Act 2006* (DfE, Sept 2018) and the School's own Recruitment Policy.
- The DSL and other senior leaders report to the School's governors at least termly. In addition, there is an annual review of this policy and associated practice and procedures.

7. AIMS

The School aims:

- to promote a strong safeguarding culture which enables all pupils to feel secure
- to support pupils' personal development in ways that will foster self-esteem, self-confidence and independence
- to ensure that pupils know how to approach adults if they – or those they know – are in difficulties, and understand that they will be listened to and their concerns taken seriously
- to provide early help to pupils and families
- to identify, support and refer those pupils who may need additional support from agencies other than Children's Services, *eg* Child and Adolescent Mental Health Services (CAMHS)
- to provide all staff with the appropriate training so they are well-informed and confident about their responsibility to identify and report any concerns about pupils relating to possible harm or abuse, including through the use of technology
- to ensure staff understand their responsibility to report any concerns about the actions of members of staff, volunteers or visitors
- to ensure that there is effective and timely communication between staff with sensitive information known to the School disseminated to staff on a 'need to know' basis
- to ensure that safeguarding procedures are followed by all staff in accordance with the School's policy, national guidance and locally agreed procedures
- to provide appropriate support to any staff or pupils who may be involved in safeguarding or child protection issues.

8. THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL) AND THE DEPUTY DSLs (See *KCSIE 2025 Annex C*)

The DSL is Mrs Mel Joel, and she takes lead responsibility for safeguarding and child protection, including online safety, throughout the whole school. There are also a number of Deputy DSLs who work in various departments across the senior school. In the Junior School, the Head is one of two DDSLs (along with the Deputy Head) and he has specific responsibility for pupils in the EYFS, but can be covered in EYFS matters by his Deputy Head in his absence.

The DSL and all DDSLs are senior members of staff with the appropriate status and authority to carry out their duties. The DSL has a significant level of responsibility and the governing body endeavours to provide additional time, funding, training, resources, and support needed to carry out the role effectively. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, and this lead responsibility should not be delegated.

The DSL works closely with members of staff responsible for pastoral care, attendance and promoting the good mental health of the pupils. She provides advice and support to other staff on child welfare and child protection

matters, takes part in strategy discussions and inter-agency meetings, and/or supports other staff to do so, and contributes to the assessment of children. The DSL also ensures that communication with parents is timely and effective.

The broad areas of responsibility for the designated safeguarding lead (DSL) are as follows:

8a Raise awareness

- a) Promote a strong safeguarding culture throughout the School so children are more likely to share concerns and know they will be listened to and taken seriously
- b) Ensure the Safeguarding Policy is known, understood and used appropriately
- c) In conjunction with the School's governors, ensure the Safeguarding Policy and procedures are reviewed at least annually and additionally in the case of a serious incident or change in legislation, and that any necessary changes are implemented without delay
- d) Ensure the Safeguarding Policy is published on the School's website and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this
- e) Promote educational outcomes by sharing information appropriately about the welfare, safeguarding and child protection issues that pupils are experiencing or have experienced
- f) Ensure good communication and that staff are alert to the specific needs of particular pupils *eg* those with special educational needs or young carers. Analysing trends to ensure they are not at further disadvantage
- g) Understand the filtering and monitoring systems and processes in place and enable an annual audit to check effectiveness in this area of online safety.

8b. Work with others

- a) To be the first point of contact for pupils, staff, parents for all matters related to safeguarding, including when there are concerns that pupils and/or families may require 'early help' following an early help assessment
- b) Act as a point of contact for the three safeguarding partners: Children's Services, Health and the Police
- c) Act as a source of support, advice and expertise to staff, including when deciding whether to make a referral to a relevant agency and when referrals are made
- d) Meet regularly with the DDSs in both the Senior School and Junior School in order to assess current safeguarding concerns, to maintain consistent practice and to promote a strong safeguarding culture throughout the School.
- e) Compile a fortnightly list of safeguarding concerns for a regular meeting with the Head in management of concerns
- f) Liaise with all staff (especially pastoral support staff, school nurses, counsellors EWOs and Head of AIM) on safeguarding matters
- g) Provide regular updates, shared by various media, to keep staff informed, between specific training sessions, about safeguarding issues
- h) To be responsible for overseeing online safety in the School with the support of the Director of Strategic Projects, the Director of Digital Services IT Support and the Junior School Deputy Head Academic
- i) To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked-after children
- j) When children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible and within the statutory five day timeframe, as outlined in KCSIE. This is transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt
- k) Ensure a request is made to the schools/nurseries of pupils joining the School for any safeguarding information. Ensuring information is received or that written assurance is received that no safeguarding information is held.
- l) Report regularly to the Link Governor for safeguarding, compiling reports with the Link Governor for briefings to governors at Board meetings.

8c. Manage referrals*

- a) Upon the receipt of any report of concerns of possible abuse, to act upon the report immediately and no longer than the same working day
- b) Refer and seek advice from Children's Services on all cases of possible abuse
- c) Refer cases to the Channel programme where there is a radicalisation concern
- d) To keep detailed, accurate records of all concerns and referrals, including concerns where there has been no requirement to make a referral
- e) Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- f) Refer cases where a crime may have been committed to the Police
- g) Inform the Head and Safeguarding Governor within one working day of any referrals (and contact lawyers for advice where appropriate).

* In certain circumstances, dependent on the best interests of the child, the DSL will seek approval of the timing of a referral from an appropriate external agency (usually the MASH team with Children's Social Services). In cases where a referral is delayed a risk assessment is drawn up to apply until the time the referral is made.

8d. The role of the Deputy DSLs is to:

- a) Be a significant influence in promoting the culture of safeguarding and child protection within the School
- b) Act as a deputy for the DSL, and at all times being available to any staff (including when the DSL is present) who wish to share concerns about the welfare of pupils
- c) To take particular responsibility for safeguarding within their section of the School and convey relevant information to the DSL for safeguarding records
- d) To convey any information to the DSL no later than the same working day
- e) In the absence of the DSL to take the lead role, ensuring that the DSL is fully briefed of any matters which have arisen on her return.

8e. Staff awareness and liaison with the DSL

All staff will be made aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This must not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

During term time the DSL (or a deputy) will always be available (during school hours) for staff in the School to discuss any safeguarding concerns, which may include availability via phone and/or other media in exceptional circumstances.

Although all staff should be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments, the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

If in exceptional circumstances, the DSL (or deputy) is not available, this must not delay appropriate action being taken. Staff must speak to a member of the senior leadership team and/or take advice from children's social care. In these circumstances, any action taken must be shared with the DSL (or deputy) as soon as is practically possible.

The DSL is also aware of the requirement – in particular circumstances – for children to have an Appropriate Adult.

Further information can be found in the [*Statutory guidance - Police and Criminal Evidence Act \(PACE\) Code C 2019*](#).

9. EARLY HELP

All staff should be prepared to identify children who may benefit from early help. All staff should be aware of the local early help process. Early help means providing appropriate support for a child or family as soon as a problem is apparent, regardless of the child's age. The aim is for targeted early intervention before difficulties escalate. An early help inter-agency assessment may be arranged through the Local Authority where the child resides. This draws upon a range of support services available to families *eg* support concerning physical/mental health, parenting, domestic abuse, school attendance. Further statutory guidance on effective assessment of the need for early help can be found in *Working Together to Safeguard Children* (2023 updated June 2025). In addition, further information for pupils living in Southwark can be found at:

<https://www.southwark.gov.uk/childcare-and-parenting/children-s-social-care/family-early-help-feh>

Any pupil may benefit from early help, but all staff should be particularly alert to the potential need for an early help assessment for a pupil 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 in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member parent or carer in prison custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- identifies as being LGBT+ or is beginning to identify as LGBT+

The DSL leads in contacting the relevant agencies and professionals. A lead professional undertakes the early help assessment who performs this role is decided on a case-by-case basis. Early help assessments require parental agreement and engagement, but if parents do not consent to an early help assessment, then a judgement will be made as to whether this will cause the situation to deteriorate further. If this is the case, then a referral to Children's Services may be made. The School's staff who deliver pastoral support, School Nurse, Education Welfare Officers, Chaplain and Counselling services are also an integral component of early help assessments within the School.

10. LISTENING TO CHILDREN

The School encourages its pupils to talk to a member of staff when they have concerns about themselves or others. In each Tutor Room and classroom there is a notice giving details of who pupils may contact if they are unsure who to approach. In addition, pastoral staff remind their pupils that they are encouraged to speak to members of staff about any concerns, and these will be taken seriously. The School also advertises the Chaplain, the Assistant Chaplain, the Education Welfare Team and the School Counsellors, and how pupils may make contact with these

members of staff.

10.1 Pupils with SEND

The School regularly offers training for staff in issues applicable to special educational need and disability (SEND) and any staff working with children with a disability receives appropriate briefings from staff both in and outside of the School. Alleen's recognises the increased vulnerability of pupils with SEND to possible bullying and safeguarding concerns, and the DSL regularly meets with the Head of AIM (who is also a member of the safeguarding team) and other relevant pastoral staff to ensure support of pupils with SEND. On the safeguarding register there is also a column to identify if the child listed is also on the register of those with a special educational need (AIM).

10.2 Vulnerable Pupils

Particular vigilance will be exercised in respect of pupils who are the subjects of Child Protection Plans and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator). If the pupil in question is a looked-after child, this will also be brought to the notice of the Local Authority DSL Designated Person with responsibility for children in public care. Where a child has an allocated social worker, the School will liaise with the virtual school head who, in addition to their statutory duties, now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. The School also notes the DfE's non-statutory guidance on [promoting the education of children with a social worker](#) that contains further information on the roles and responsibilities of virtual school heads. In September 2024, the role of Virtual School Heads was further extended to include a non-statutory responsibility to promote the educational achievement of all children in kinship care. Non-statutory guidance on [Promoting the education of children with a social worker](#) and children in kinship care arrangements contains further information on the roles and responsibilities of Virtual School Heads.

Local authorities should share with the School the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

The School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. The School is aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges. Further information can be found in the DfE's [SEND Code of Practice 0 to 25](#) and [Supporting Pupils at School with Medical Conditions](#).

If a pupil discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this must be referred to the Designated Safeguarding Lead as a safeguarding issue.

The School also acknowledges the additional need for support and protection of children who are vulnerable by virtue of homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions, pupils who are excluded from school and pupils where English is an additional language, particularly for very young children, using the translation service if necessary.

11. THE CURRICULUM

The School acknowledges the importance that the curriculum plays in the prevention of abuse and in the preparation of pupils for the responsibilities of adult life and citizenship. The School ensures that children are taught about safeguarding, including online safety, as part of its broad and balanced curriculum. As appropriate, the curriculum

is used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened. Central to this is the work of the Head of PSHE (the PSHE Coordinator in the Junior School), but all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils, including online.

Alleyn's displays its 'Vision and Values' prominently in both Senior and Junior School classrooms. It emphasises the importance of its values and positive school ethos with a central theme of respect for others as part of its promotion of fundamental British values.

The School regularly discusses how children can keep safe online, including their use of social media and responding to harmful online challenges and hoaxes. All pupils sign an 'IT Acceptable Use Agreement' which – for older pupils – includes mention of mindful behaviour online and in social media, and also mentions fundamental British values.

Monitoring and filtering of IT is run by the Director of Digital Services, in line with the School's IT and E-safety Policy. The standards of filtering and monitoring block harmful and inappropriate content, without unreasonably impacting teaching and learning.

The School also considers how the curriculum and co-curriculum can help in promoting a healthy school by:

- developing a School ethos and environment which encourages safe and healthy lifestyle for pupils
- ensuring that food and drink available across the School day reinforces the healthy lifestyle message
- covering relevant issues through Relationships Education (AJSE) and Relationships and Sex Education (RSHE)
- delivered through the PSHE programme in both the AJSE and Senior School
- providing high quality Physical Education and sport to promote physical activity
- appreciating a sense of 'the other' aside from purely materialistic interpretations of the meaning of life, enabling an appreciation of what constitutes a spiritual understanding
- encouraging a sense of gratitude for the opportunities offered in the community of Alleyn's and the wider British society
- promoting an understanding of the full range of issues and behaviours which impact upon lifelong health and well-being both as an individual and as part of wider modern British society.

11.1 School residential trips

The DSL and the Deputy Head of the AJSE (DDSL) routinely sign off all trips involving any overnight stays. If a pupil on the safeguarding list of concerns is included in that trip, the DSL and Deputy Head of the AJSE will consult with the relevant member of staff so that proper support of the pupil (which might involve not allowing him or her to take part due to concerns about welfare) can be guaranteed.

12. CATEGORIES OF ABUSE

Knowing what to look for is vital for early identification. All staff should be aware of indicators of abuse, neglect and exploitation, as detailed in *KCSIE* (2025) and summarised below, so that they are able to identify pupils who may be in need of help or protection. **If staff are ever unsure or have any concerns whatsoever, they must always speak to the DSL or a DDSL.**

- **All** staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- **All** staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children who are not pupils of the School.
- **All** staff should be aware of the indicators of abuse and, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the School, inside and outside of home, and online.

Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

- **All** staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as *Contextual Safeguarding*, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

12.1 Definition of Abuse:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. KCSIE (2025)

12.2 Categories of Abuse

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of the School's policy and procedures for dealing with it.

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

givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Affluent neglect is the emotional (or other forms) of neglect experienced by children in wealthier families, which is often harder to identify because the children have material security. They may experience issues such as emotional distance, excessive academic pressure, lack of supervision and may spend long periods with paid carers, creating feelings of loneliness and unfulfilled emotional needs.

For more information see: *What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners* <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2> This gives additional information and examples of potential indicators of abuse and neglect. The NSPCC website also provides useful additional information on abuse and neglect and what to look out for.

13. SPECIFIC SAFEGUARDING ISSUES

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos. These can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of. See also Appendix 1 of this policy and Annex B of *KCSIE*(2025).

Issues include:

- Mental health
- Children who are lesbian, gay, bi, or trans (LGBT)
- Child on child abuse
- Sexual harassment, online sexual abuse and sexual violence
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Sexualised behaviour of children
- Harmful sexual behaviour
- Children who are sexually active
- Upskirting
- Domestic abuse & Operation Encompass
- Child sexual exploitation
- Child criminal exploitation & County lines
- Preventing radicalisation
- Children missing, or unexplainable and persistent absence, from education
- Homelessness
- So-called 'honour-based' violence
- Female Genital Mutilation
- Violence against women and girls
- Forced marriage
- Children and the court system
- Children with family members in prison
- Private fostering

14. Online Safety

Also see: IT & E-safety Policy (SS) /Online safety Policy (AIS) and Acceptable Use Agreements for staff and pupils

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

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, AI fake images/videos, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying,
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Messages around online safety are a feature of the School's pastoral care via tutors and assemblies and covered in the PSHE programme. The School recommends to parents that they take steps to check that their child is staying safe online, advising them to check the privacy and security settings of home networks carefully.

The School requests that pupils report safeguarding incidents that occur online (such as harmful online content or cyberbullying) as soon as possible so that the School may follow them up, and pupils may also report harmful online content via the UK Safer Internet Centre at <https://reportharmfulcontent.com>

Online teaching follows the same principles as set out in the relevant staff code of practice/conduct and the School has published specific guidance on remote learning protocols and online safety for staff, including practices for live remote audio or video contact with individual pupils and live-streaming of audio and visual content (see Education Continuity Policy which includes safeguarding guidance during a period of school closure.

The DSL understands and has responsibility for the filtering and monitoring systems, and the processes that are in place, to promote effective safeguarding.

The IT support team ensures that the filtering and monitoring systems protect pupils and the School's IT systems. There is an annual audit of the systems in place and a logging and recording mechanism for any online concerns, overseen by the DSL. Any online safety incidents are brought to the attention of the DSL and if appropriate they are dealt with in line with this policy. IT safety features in regular meetings and the annual audit is attended by senior members of the IT team and the Link Governor for Safeguarding. The Link Governor for Safeguarding reviews the standards and discusses with IT staff, the Data Protection Officer and the DSL what needs to be done to support the School to ensure it meets the standards, including in relation to its responsibilities under the 'Prevent Duty'. This can be found in Appendix 1, Section 11.

At induction, staff receive appropriate online safety guidance as part of their safeguarding and child protection training, including ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

The School also uses the following DfE guidance:

- *Meeting Digital and Technology standards in schools and Colleges (2022 updated March 2025)*
- *Generative AI: product safety expectations*

15. PROCEDURES IF STAFF HAVE A CONCERN ABOUT A PUPIL OR IF A PUPIL DISCLOSES INFORMATION

Staff must always act in the best interests of the child.

The School has a responsibility to protect all pupils in its care and all staff share the duty to safeguard and promote the welfare of pupils. The term 'welfare' is taken to embrace health, happiness, development (physical, intellectual,

social and behavioural) as well as protection from the risk of suffering harm. This applies equally during the School day and during out-of-school activities, including visits over the weekend and holidays, or term-time residential trips off-site. The welfare of the pupils at home, or when they are not under the responsibility of the School, is also included if this comes to the attention of the School.

If a member of staff has concerns about a pupil or if a pupil makes a direct disclosure the following advice must be followed:

Listen carefully and keep an open mind. Do not attempt to decide if abuse has taken place or not.

Keep calm. Keep your responses to the pupil calm and reassuring, even if they are telling you distressing or shocking information

Never guarantee secrecy or confidentiality. Explain to the pupil that to make sure they are safe you will need to speak to others to help you

Never ask leading questions. You must not ask leading questions or cross question the pupil. Let the pupil tell you what he/she wants to and do not press for more. Too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.

Do not attempt to investigate matters further. Your role is to listen, record and report your concerns to the DSL.

Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury.

Be aware that younger pupils may disclose issues of a safeguarding nature in general conversations rather than as a specific disclosure. Children who are affected by abuse or neglect may also demonstrate their needs and distress without specific concrete evidence through their words, actions, behaviour, demeanour, written work, artwork or through other children.

There may also be concerns raised about a parent's interaction with a pupil or issues such as parental alcohol misuse, domestic violence or mental health.

If there is any concern at all, this must be reported to the DSL and recorded. In many safeguarding cases it is not one major incident which triggers a referral but a series of seemingly more minor events. It is therefore crucial that all concerns are recorded and reported to the DSL without delay. Ultimately, all the School's systems and processes must operate with the best interests of the child at the core.

15.1 Recording safeguarding concerns (*also see Flow chart Appendix 2*)

All concerns must be recorded on CPOMS as soon as possible, and no later than the same working day. Any conversations directly with a pupil or overheard, or concerns arising for any other reasons must be recorded. If for any reason access to CPOMS is not possible concerns must be emailed to the DSL or conveyed in person, followed up by email.

The DSL will then decide on the most suitable course of action.

Information must be recorded neutrally, without personal commentary and should contain facts and information only, taking care to avoid personal opinion or assumptions. The record should be made as soon as possible after speaking to the pupil, so the pupil is not upset about notes being taken as they talk and before the conversation is discussed with anyone else.

The record must include the date, time and place of any conversation, who was present and what was said by the pupil. It is important to record the pupil's own words as much as possible.

On receipt of the report, the DSL will record the action taken. Depending on the circumstances of the report action taken may include one or more of the following:

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

The member of staff making the report will be informed by the DSL of the action taken. As far as it is able, the School takes into account the child's wishes and feelings when determining what action to take and what services to provide but staff are highly aware of the dangers of collusion or promising confidentiality. There are systems in place for children to express their views and give feedback.

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

In certain circumstances, dependent on the best interests of the child, the DSL will seek approval of the timing of a referral from an appropriate external agency (usually the MASH team with Children's Social Services). In cases where a referral is delayed a risk assessment is drawn up to apply until the time the referral is made.

15.2 Preserving evidence

Any evidence *eg* pupil's work, notes, images on iPads, mobile phones containing messages, computer search history etc must be preserved. If evidence is found on an electronic device, the device involved should be isolated. ***Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means, as to do so could constitute a criminal offence.***

16. REFERRALS TO OTHER AGENCIES

Referrals to services regarding concerns about a child or family typically fall into three categories:

1. Early Help Services;
2. Child in need – Section 17 (Children Act 1989) referrals
3. Child protection – Section 47 (Children Act 1989) referrals

Southwark and other London boroughs use the Pan London Thresholds of Need.

<https://www.londonsafeguardingchildrenprocedures.co.uk/files/threshold.pdf>
SSCB-multi-agency-threshold-guide-2019.pdf

This document sets out detailed guidance about how concerns within these different levels of need should be responded to.

All safeguarding referrals for pupils resident in Southwark should be made to Southwark Multi Agency Safeguarding Hub (MASH) via their Referral Form and copied to the LA's Schools Safeguarding Coordinator. Referrals for children who live in other boroughs should be made to the borough in which the pupil primarily resides.

Prior to any written referral to social care, there should be a verbal consultation with Children's Services of the relevant Local Authority to ensure that making a referral is an appropriate action.

The parent/carer will normally be contacted to obtain their consent before a referral is made and to explain the School's course of action. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Abuse, fabricated or induced illness or the DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member or exacerbate the situation in any way, nothing will be said to the parent/carer prior to the referral being made. However, a rationale for the decision to progress without consent must be provided with the referral.

When the School makes a referral, the local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the School, as the referrer know the outcome. The DSL will follow up if this information is not forthcoming. If, after a referral, the child's situation does not appear to be improving, the DSL will consider following local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

An Early Help request will be made to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services.

In cases where the Local Authority determines that a Section 47 investigation is required the DSL will liaise closely with the Head to inform her of the issues, especially ongoing enquiries (as dictated by Section 47 of the Children Act 1989) and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult present for such enquiries or investigations.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the Child Protection referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of, for example, parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the School day, urgent Police intervention will be requested.** Where a child sustains a physical injury or is distressed as a result of reported chastisement or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation. Further details on Section 17 and Section 47 referrals can be found in *Working Together to Safeguard Children* (2023 updated June 2025).

If staff members, report safeguarding information to the DSL or a DDSL and believe that appropriate action has not been taken, or the safeguarding concern is not being resolved/addressed, and they do not feel able to raise concerns internally, then they are encouraged to use the School's Whistleblowing Policy or for independent advice they may call the NSPCC helpline on : 0800 028 0285 or email help@nspcc.org. There is also the

Protect whistleblowing helpline on 020 3117 2520

17. SAFEGUARDING RECORDS

Accurate written notes are kept of all incidents and child protection or child in need concerns relating to individual pupils, including if the incident or the concern does not lead to a referral to other agencies. All contact with parents and external agencies is also recorded, using the CPOMS system.

Records are kept in a secure part of CPOMS and separate from the child's general or educational files. They may only be accessed by the DSL, the DDSLs and the Head. Information may be shared directly with other agencies as appropriate and will be shared according to the HM Government guidance *Information Sharing (May 2024)*. The guidance states that practitioners should use their judgement when making decisions about what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.

Pupils and parents do have the right to see all the information held in child protection records unless the information:

- could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child; or
- is likely to prejudice an ongoing criminal investigation; or
- also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

If an application is made to see the whole record, advice should be sought from the child's social worker, if they have one, and the Local Authority.

The content of Child Protection Conference or Review reports prepared by the School will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carers in advance of the meeting.

Child Protection records will be sent to receiving schools separately from the main pupil file and under a confidential cover when pupils leave the School as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term ensuring secure transit and that a confirmation of receipt is obtained.

In addition to transferring the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives. Parental consent is not required for child protection records to be shared with the new school. The DSL must ensure child protection records are received from previous schools or settings the child has attended or that written confirmation is obtained to verify that no records exist. Key relevant staff are made aware of the information as appropriate.

When pupils are withdrawn from the School other than at the normal date of transfer; due to a family move or any other reason, all efforts will be made to identify the new address and the School to which the pupil is being admitted to ensure that all records are transferred without delay. If the parent/carer fails to provide this information, an urgent referral will be made to the Local Authority in order that they might make further enquiries.

If Alleyn's receives educational records relating to a child who is not registered with the School, the records will be returned promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. A child's name will only be removed from the School's Admissions Register in accordance with Regulation 9 of the School Attendance (Pupil Registration) (England) Regulations (2024).

The School will inform the Local Authority when it adds or deletes a pupil's name from the School admission register for any reason in line with Southwark's [Children Missing Education \(CME\) Protocol](#). If a pupil arrives and the previous school is unknown, the School will contact the local authority for further guidance and information. The School requires documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the Local Authority and other statutory agencies, as appropriate.

The School maintains accurate and up to date records of those with Parental Responsibility and emergency contacts. It holds more than one emergency contact number for each pupil so it may make contact with a responsible adult if necessary. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their

written consent.

All contemporary records and all records of past pupils are stored safely and securely, and the School follows guidance on retaining records for future safeguarding purposes.

18. STAFF RECRUITMENT PROCEDURES (*also see Alleyn's School Recruitment Policy*)

The School follows safer recruitment procedures, paying due regard to Part 3 of *KCSIE (2025)*, *Disqualification under the Childcare Act (2006)* and the Early Years Foundation Stage Statutory Guidance (2025). Safer recruitment procedures are applicable to all categories of staff which includes employees, self-employed staff, staff of contractors, supply staff, governors, volunteers and visitors. The checks applied will vary according to the person's role within the School. The checks include:

- a) Verification of identity
- b) At least two references
- c) Verification of the right to work in the UK
- d) Where appropriate, verification of qualifications
- e) For qualified teachers, verification of QTS and completion of probationary/induction period
- f) A medical fitness questionnaire and declaration.
- g) Verification of employment history
- h) For staff in regulated activity, a satisfactory enhanced check with the Disclosure & Barring Service (DBS)
- i) Carry out a check against the Barred List when an individual is deemed to be undertaking regulated activity
- j) A self-declaration to ensure compliance with regulations made under the Childcare Act 2006
- k) For staff engaged in teaching duties, a check that the teacher is not subject to a teaching prohibition order.
- l) Where appropriate, overseas police checks
- m) Where appropriate, obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.
- n) Where appropriate, a check to ensure the person is not barred from taking part in the management of an independent school
- o) Online searches to identify any incidents or issues that are publicly available.
- p) Obtains written notification that appropriate recruitment checks have been undertaken by other organisations, if those personnel are not employed directly by the School, and a check that such staff presenting themselves are the ones on whom the checks have been made.

To ensure suitable people are recruited and safer recruitment practice is followed, the School will ensure that personnel involved in the recruitment and employment of staff receive appropriate safer recruitment training, which is updated every three years.

All recruitment checks are recorded on the School's Single Central Record. The Single Central Record is reviewed before the start of each term at the Single Central Record Review Meeting, which is attended by relevant members of Senior Management, the Human Resources lead on the SCR and the Link Governor for Safeguarding.

18.5 Visitors

All visitors during the School day are required on arrival to sign in at Townley Lodge or the Junior School Lodge. Visitors are issued with an appropriately coloured visitor's badge-lanyard on which is printed further instructions for the safety of both the visitor and the School community. Visitors to school buildings (not being used for sports fixtures) must remain under the supervision of a member of staff at all times and be shown back to the Lodge where the badge must be returned. Staff are encouraged to engage with any unidentified visitor and ask what her or his business is, and, if unsure, the visitor must be reported immediately to Townley Lodge or the Junior School Lodge.

18.6 Visiting Speakers

Under the Prevent Duty, the DSL and the Deputy Head in the AIS will maintain a register of all visiting speakers and will ensure they are checked as suitable before being permitted to visit the School.

19. ALLEGATIONS MADE AGAINST/CONCERNS RAISED IN RELATION TO STAFF

See Part Four of [KCSIE \(2025\)](#). The School also notes the '[Safeguarding information for professionals and the community in Southwark](#)' on Southwark's website.

Alleyn's School takes seriously all safeguarding concerns or allegations against those working in or on behalf of our school in a paid or unpaid capacity. The School will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member staff, including supply teachers, volunteers and contractors. All such allegations and concerns must be brought immediately to the attention of the Head or one of the Senior Deputy Heads or DSL if the Head is not available and nothing should be said to the colleague involved.

In cases where the Head is the subject of the allegation or concern, this must be reported to the Chair of Governors, without notifying the Head first, in order that the Chair may activate the appropriate procedures. If there is a situation where there is a conflict of interest in reporting the matter to the Head, this should be reported directly to the local authority designated officer(s) (LADOs).

There may be two levels of allegation/concern:

- Allegations that may meet the harms threshold
- Allegations/concerns that do not meet the harms threshold – known as 'low level concerns'.

19.1 Allegations that may meet the harms threshold (see management of such allegations below)

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the School and will be used in respect of all cases in which it is alleged that anyone working in the School or college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

The Local Authority Designated Officer (LADO) must be informed of all such allegations that come to a school's attention and appear to meet the above criteria, as well as any concerns where the School is unsure. Contact can also be made with LA's Schools Safeguarding Coordinator who will liaise with the LADO.

Where the School identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the School will contact the Southwark Multi Agency Safeguarding Hub ([MASH](#)) (or its equivalent in another LA if the child resides in a different LA) and/or the police immediately as outlined in the referral process contained in this policy.

When dealing with allegations, the School will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance and London Safeguarding Children Partnership ([LSCP](#)) procedures. This process will agree upon the appropriate course of action and the time-scale for investigations.

19.2 Management of Allegations that meet the harms threshold

Allegations will be managed according to the following procedure:

1. Any allegation about a member of staff or volunteer must be reported without delay to the Head. In the Head's absence, an allegation against a member of staff must be reported to the DSL
2. If the allegation is about the Head, the report should be made to the Chair of Governors, without notifying the Head
3. The Head or Chair of Governors will not conduct any investigations but will ask the person reporting the concern/allegation to write a detailed account of his/her concerns. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation
4. Any allegations against staff, including those considered borderline, must be discussed with the LADO without delay
5. The Head or Chair of Governors will immediately contact the LADO for Southwark within one working day of receiving the concern/allegation
6. The LADO will agree a course of action and will judge if immediate action is needed or if the concern can be dealt with through the School's usual staff disciplinary procedures
7. The Head will not undertake any enquiry or investigations. The Head will lead enquiries at a school level only if the matter is agreed with the LADO to be a disciplinary issue
8. The Head does not require parental consent before contacting the LADO
9. All documentation relating to allegations will be stored securely.

If an allegation is made against a member of staff the quick resolution of that allegation will be a clear priority and to the benefit of all concerned.

Where there are no objections from the investigating agencies, the Head will:

- inform the person making the allegation and explain the likely course of action
- ensure the parents of the pupil who is the alleged victim have been informed about the allegation and the likely course of action
- inform the member of staff against whom the allegation is made and explain the likely course of action
- keep a written record of the above.

If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. The Head will take advice from the LADO and other agencies to agree:

1. Who needs to know and exactly what information can/cannot be shared
2. How to manage speculation and gossip
3. What, if any, information can be given to the wider community to reduce speculation
4. If necessary, how to manage the press.

The Head, in consultation with the LADO, will decide whether or not to suspend the individual. If suspension is appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons.

19.3 Outcomes of an investigation following an allegation

There are four possible outcomes following an investigation into an allegation against staff: substantiated, malicious, false, and unsubstantiated.

An allegation that is found to have been malicious will be removed from personnel records and any that is not substantiated, is unfounded or malicious will not be referred to in employer references. Allegations that are found to have been malicious are likely to have breached School policy and are proscribed in the Whistle-blowing Policy. The School will therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).

If the allegation concerns alleged minor physical mishandling or verbal abuse, this will normally be dealt with under the School's disciplinary procedures, unless one or more of the following criteria applies:

- There is reason to suspect parental instigation or collusion
- The allegation has been reported to the Police or Children's Services by the parent or child
- The child is Looked After in Public Care
- The child is subject to a Child Protection plan or a Child in Need plan
- The child has a disability or Statement of Special Educational Need
- The member of staff concerned has been subject to previous complaints

In these cases, advice will be sought from the LADO with a view to a Strategy Meeting or Discussion being held in accordance with the Southwark SCP safeguarding procedures. This process will agree upon the appropriate course of action and the time-scale for investigations. In considering whether or not a referral to Children's Services is appropriate, the Head may seek advice from the Link Governor for Safeguarding, the Chairman of Governors, Southwark's Professional Advisor for Safeguarding in Education, the LADO and other relevant external agencies.

19.4 REFERRAL TO THE DBS AND THE TEACHING REGULATION AGENCY (TRA)

The School has a legal duty to refer to the DBS within one month of ceasing to use a person's services, (whether employed, contracted, a volunteer or student) anyone who has harmed, or poses a risk of harm, to a child, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had that person not left the School. (Note: ceasing to use a person's services includes: dismissal; removal; resignation; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; voluntary withdrawal from supply teaching; contract working; a course of initial teacher training, or volunteering.)

If the individual is engaged in teaching duties, a referral will also be made to the TRA. Referrals may be made to the TRA (irrespective of whether the criteria for a DBS referral have been met) for unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, any time, for a relevant offence. Advice about whether an allegation against a teacher warrants a referral to the TRA can be found in *Teacher misconduct: the prohibition of teachers* (April 2018). Further guidance is also published on the TRA website.

19.5 Supply and other staff

The School may also have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers or other staff provided by a third party. Whilst the School is not the employer it will ensure that any concerns or allegations are dealt with properly. In no circumstances will the School cease to use an individual due to safeguarding concerns, without liaising with the LADO.

19.6 Allegations/concerns that do not meet the harms threshold - known as 'low level concerns'

School staff must be alert to behaviours that may cause 'low-level' concerns such as being over friendly with children, having favourites, taking photographs of children on their mobile phone contrary to school policy, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating or offensive language.

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the threshold set out in (1.) above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the School or college 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. However, the school may, at its discretion, contact the LADO for guidance on how to respond to certain low level concerns when appropriate. Low-level concerns must be reported to the Head (or DSL/SDH if unavailable) (see management of such concerns in section 19.7 below).

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Staff Code of Conduct. In these circumstances, self-reporting is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting of low level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

19.7 Management of concerns that do not meet the harms threshold – 'low-level concerns'

KCSIE (Sep 2025) states in paragraph 433: "It is crucial that all low-level concerns, are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings."

Any low-level concerns must be reported and recorded. They are managed according to the following procedure:

1. The member of staff or volunteer, child or parent should contact the Head (or DSL if unavailable)
2. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified
3. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible but cannot be guaranteed.
4. The Head will deal with the concern and contact with the LADO is recommended for advice on how to act
5. The School will keep records of the concerns in a confidential area of the Head's office and the records must comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
6. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified
7. The School will retain such information at least until the individual leaves employment here as recommended in *KCSIE* (2025)
8. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO
9. Consideration will also be given to whether there are wider cultural issues within the School or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

21. USE OF CAMERAS, MOBILE PHONES AND OTHER DEVICES, INCLUDING IN THE EYFS (*also see Digital Usage Policy no. 305*) TAKING, STORING AND USING IMAGES OF CHILDREN

21.1 Use of photography or video

Parents, carers or relatives may only take photographs or video recordings of pupils in school or on school-organised activities with the prior consent of the Head or for Junior School pupils, the Junior School Head. Parents are usually asked to restrict photography whether on cameras, mobile phones or other devices to major school events and this is indicated on the respective programmes; general filming in school by parents is never permitted. Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may cause offence or embarrassment.

Images taken by parents must be for private use only and must not be placed in the public domain. Recording and/or photographing other than for private use would require the consent of the other parents whose children may also be captured on film. Without this consent, Data Protection legislation would be breached.

Other visitors, volunteers and contractors in school are not permitted to take photographs in any area of the School without specific permission from the Head.

If parents do not wish their children to be photographed, filmed or for their photographs to be used in any school publications or promotional materials, they must sign the School's documentation on photography to assert this.

21.2 Pupil Use of Mobile Phones

Phones are banned during the School day for Years 7 to 11. In Years 7-10, phones are locked away by staff and returned to students at the end of the day. Year 11 and Upper School students should have their phones turned off and in lockers or in the bottom of their bags. Sixth Form students may only use their phones in the Sixth Form common room. NOT in study spaces. If students need to contact home during the School day, either by messaging or calling, they must do so at Reception or with a section administrator. Phones must categorically NOT be out in changing spaces or toilets for any reason. If phones are confiscated in these areas, we will ask parents to come in and collect the phone. Use of phones in these areas compromises our safeguarding protocols and will come with a serious sanction. Any phones seen, or seen being misused, will be confiscated and handed into Reception where they can be collected at the end of the School day. Socially aggressive or bullying behaviour against members of our school community or directed towards students from other schools is recognised as potentially very harmful and will be treated as a serious pastoral matter. If a student feels they need support in using their phone correctly, or they see something unkind or something that worries them, they should reach out to a member of their personal pastoral team. In summary, smartphones continue to be allowed at Alleyn's with greater restrictions on their use and clear penalties for misuse.

21.3 Staff use of photography and video

Photographs and video clips are often used to evidence pupil achievement and progress. When using technology members of staff must adhere to the School policy on photography and video in that:

- Videos and photographs must be taken on school devices, whenever possible. This does not specifically apply to EYFS pupils but is best practice for all pupil images. Mobiles are not banned in EYFS settings but there is a requirement to have a clear policy which sets out their use and how use is monitored.

On the rare occasions a personal device may be needed to be used, photographs or videos of pupils must not be stored. Any images must be uploaded to the School's server within 24 hours and permanently deleted from the personal device.

School devices must only be taken off site to record evidence of out-of-school learning or for contact purposes during off site activities.

- Staff must not take video footage or photographs of pupils other than for school purposes
- Images must never be placed in the public domain without the express permission of the Head

- Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may cause offence or embarrassment
- If staff take digital images of children taking part in school activities, they are required to download the images within 24 hours of taking them, or within 24 hours of return from the trip on which they were taken.
Downloading should be done on the appropriate school pictures folder, managed at school
- Stored footage or photographs taken remain electronically in school

21.4 Staff use of Email, electronic communication and computers

Staff must only use the School's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head and Governing Body.

When communicating with pupils, parents or carers, or for communications on any other school business, staff must only use the approved School email, or other School-approved communication-systems. Staff must not disclose their personal telephone numbers, addresses or email addresses to pupils or parents/carers. Staff should be mindful of any communications they have about school matters in public.

All computer equipment and internet access within the School will be subject to appropriate controls and internet safety rules in line with our E-safety Policy/Online Policy (AJS). Pupils and staff will sign the IT Acceptable Use Agreement, and regular mention of appropriate use of IT is made at staff training sessions. The IT Acceptable Use Agreement signed by pupils is sent to parents for their awareness.

21.5 Remote learning and school closure

In a situation where teaching and learning is supplied off-site (due to school campus closure, for instance), teachers and operational staff must not communicate with pupils through any channels other than school email accounts and the use of approved apps like Microsoft Teams. Staff will receive guidance about any 'live' education delivery, *eg* via Microsoft Teams.

Staff, pupils and parents will be reminded that the usual arrangements for safeguarding are not affected by School closure and that the School Safeguarding Policy applies despite pupils learning remotely. (See Appendix 4)

22. STAFF CODE OF PRACTICE/CODE OF CONDUCT (*see Staff Code of Conduct (Junior School) or Staff Code of Practice (Senior School)*)

All members of academic staff in the SS and AJS must adhere to the Staff Code of Conduct (AJS) or Staff Code of Practice (SS) which includes sections on pupil welfare and the importance of setting the right example to children. Both Schools have handbooks for staff.

These codes aim to ensure the welfare of pupils in the School through all staff:

- being aware of and following relevant School policies including but not limited to: Safeguarding, Health and Safety, Anti-bullying, Rewards & Sanctions, IT and E-safety, Pupils' Social and Emotional Well-being and Mental Health (Senior School), Whistleblowing and First Aid
- respecting others regardless of age, gender identity, sexual orientation, disability, race, religion, beliefs or socio-economic background
- performing their duties in a professional manner
- acting as appropriate role models in School, in their behaviour and dress
- maintaining appropriate professional relationships with pupils
- supporting the holistic development of pupils
- contributing to and supporting the pastoral work of the School

- ensuring that pupils are treated with respect and dignity
- ensuring that no punishment, detention, restraint, sanctions or rewards are used outside those detailed in the School's Rewards and Sanctions Policy
- ensuring adherence to the Use of Physical Force Policy/Restraints Policy (AJS), which underlines that there are absolutely no circumstances in which corporal punishment can be applied, nor can it be used as a threat

Advice for full-time, part-time, temporary, teaching, and operational staff, volunteers and visitors about appropriate behaviour in and out of school is contained in either the Staff Handbook under 'Staff-Pupil Relations' (SS) or in the Staff Code of Conduct (AJS). This advice should be read in conjunction with this policy and is available to staff electronically on the Hub and in hard copy from the DSL. Failure by staff to comply with the codes for staff conduct may lead to disciplinary action, including dismissal.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. If meeting pupils for 1:1 coaching, counselling or meeting, staff should not use quiet out-of-the-way places. Staff should know that colleagues are nearby and use spaces where there is a door window. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting. All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

School staff should be alert to behaviours that may cause 'low-level' concerns such as being over friendly with children, having favourites, taking photographs of children on their mobile phone contrary to school policy, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, humiliating pupils (see above about what a 'low-level' concern is and how to share these concerns).

School staff should also be alert to the possible risks that might arise from social contact with pupils outside of the School. Where members of staff have children who attend the School, it is recognised that their child's friends may visit the family home. In these circumstances, staff must remain mindful of their professional safeguarding responsibilities. The same high standards of conduct that apply within the School also apply in any out-of-school contact with pupils. Staff should immediately report any safeguarding concern that arises during such contact to the DSL, following School procedures.

Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the Head or Deputies, as appropriate. Staff supervising off-site activities or school journeys will be provided with a school mobile phone as a point of contact for parents and carers.

Abuse of trust and inappropriate relationships

All staff must maintain appropriate professional boundaries in their dealings with pupils and understand that they are in a position of trust. It is an offence for a person in a position of trust to

- intentionally touch a child in a sexual way
- have a sexual relationship with a child, even if the relationship is consensual
- cause or incite a child to engage in sexual activity
- intentionally engage in sexual activity in the presence of a child
- for the purposes of sexual gratification cause a child to watch a third person engaging in a sexual activity or look at an image or any person engaging in a sexual activity.
- A child for these purposes is a person under the age of 18.

However, these professional boundaries apply to **all pupils** in the School, including those over the age of 18 years. It is important to note that a relationship between a member of staff and a pupil is never a relationship of equals. Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

Forming inappropriate relationships with young people who are pupils at another school will also be regarded as misconduct as it indicates that the member of staff does not understand the importance of maintaining appropriate boundaries with pupils or young people.

A document has been produced by the Safer Recruitment Consortium to advise staff on safer working practices. It is non-statutory but contains detailed advice. <http://www.saferrecruitmentconsortium.org>.

23. STAFF TRAINING AND INDUCTION OF NEW STAFF

Designated Safeguarding Lead and Deputies

The DSL (and all deputies) undergo training at an advanced level to provide them with the knowledge and skills required to carry out their roles. This training is updated at least every two years. They also have updates on relevant issues at least annually, or as recommended by the London Safeguarding Children's Partnership.

Training includes local inter-agency working protocols and training in Southwark Safeguarding Children's Partnership's work under advice published by the London Safeguarding Children Partnership (LSCP) and their approach to *Prevent* duties. The training is provided by the Southwark SCP or an external training-provider. The Deputy Designated Safeguarding Leads (DDSLs) also have training to the same level as the DSL. The DSL advises on appropriate training for all constituencies of the School in consultation with the Southwark SCP and in line with *KCSIE (2025)*.

The DSL and deputies receive appropriate training in order to:

- Understand the process for providing early help assessments and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Be aware of local procedures and thresholds of need
- Be aware of the appropriate channels for the variety of safeguarding concerns that might need referral, or advice being sought
- Have a working knowledge of how local authorities conduct a child protection assessment, case conference and child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to, and understands, the School's safeguarding and child protection policy and procedures, ensuring especially that new and part time members of staff are trained prior to coming into supervisory contact with children.
- Link with the local LSCP to make sure staff are aware of training opportunities
- Provide regular updates, shared by various media, to keep staff informed, between specific training sessions, about safeguarding issues.

The full role of and training content for the DSL and deputies is set out in Annex C of *KCSIE (2025)*.

23.1 Induction training for new staff

The DSL has overall responsibility for ensuring that all new members of staff, and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training takes place prior to staff starting work with children and is informed by advice from the LSCP and communications from the Southwark Safeguarding schools coordinator.

23.2 Staff working directly with children

All new staff working directly with children are provided with induction training that includes:

- Alleyn's Safeguarding and Child Protection Policy, including the policy to deal with child-on-child abuse and

- information about the identity and role of the DSL and any deputies
- a copy of Part 1 of *KCSIE (2025)* or Annex A for those who do not work directly with children. The DSL will determine which is the most suitable according to the person's role.
- A copy of KCSIE (2025) Annex B
- Staff code of conduct
- Whistleblowing Policy
- IT Acceptable Use Policies
- Pupil behaviour policy, including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- the School's safeguarding response to children who are absent from education
- On-line safety policy, which, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring

All new staff who have direct contact with children are also trained at a specific session run by the DSL, the AJS Deputy Head (DDSL) or the Head of HR. They are required to read the documents listed above and sign an acknowledgment that they understand the contents. In addition, new staff are given a training session on the School's pupil conduct expectations (the Pupil Code of Conduct/Golden Rules (AJS)) and they must sign an Acceptable Use Policy for use of the School's IT facilities, including specific material about their use of IT and social media.

New staff who have responsibilities for teaching in specialist areas, specifically one-to-one music tuition, sports coaching and any other tuition which takes place one-to-one, are reminded of the particular need for care in discharging their duties according to the School's safeguarding procedures and Staff Code of Conduct.

23.3 Operational staff

Operational staff receive initial safeguarding training from the Head of Human Resources. They are required to read the School's Safeguarding Policy, Part One of *KCSIE 2025* (or Annex A, depending on assessment as to which best promotes the safeguarding and welfare of children) and the Staff Code of Conduct. They must sign to confirm they understand the contents.

23.4 Staff refresher training

The whole staff (academic, operational and volunteers) meets for training each year for updates organised by the DSL. Other updates are delivered during the year at staff training sessions, as required. All staff are trained in how to listen, respond to and report any disclosures including those which involve child on child abuse, sexual violence or harassment.

Individual staff training on safeguarding issues is also available through the CPD budget and staff can approach the Senior Deputy Head and the Head of the AJS regarding such training needs.

23.5 Governors

All members of the Board of Governors receive safeguarding training which is updated at least annually. The Link Governor with responsibility for safeguarding receives additional training. The Governors also receive training from approved bodies such as ISBA.

23.6 Co-curricular staff, volunteers and temporary staff

The School takes a risk-based approach to the level of information that is provided to temporary staff and volunteers.

Co-curricular staff and volunteers (eg the AJSA Committee members, adults helping with co-curricular activities) with unsupervised access to pupils, and temporary staff receive initial induction on safeguarding issues from the DSL in the Senior School and the DDSL in the Junior School, before they have contact with pupils.

Temporary and voluntary staff who work with children will be made aware of Safeguarding arrangements by either the DSL, the Head of Human Resources or the DDSL (AJS Head).

23.7 Training Records

The Head of Human Resources keeps a log of all staff training in safeguarding and child protection, and this is reviewed each term with the Link Governor and at a meeting about the Single Central Register with the Head, Head of the Junior School and DSL, at the start of each term.

24. THE ROLE OF THE BOARD OF GOVERNORS

The Board of Governors takes its responsibilities regarding children's welfare seriously. The governors will ensure that they comply with their duties under legislation and that the policies, procedures and training in the School are effective and comply with the law at all times. The Governing Board also ensures that all staff and volunteers, including governors, receive appropriate safeguarding and child protection (including online) training at induction.

The training of governors aims to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at Alleyn's are effective and support the delivery of a robust whole-school approach to safeguarding. The Governing Body is aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 and the local multi-agency safeguarding arrangements.

Further information can be found at [Human Rights / Equality and Human Rights Commission](#) and [Equality Act 2010: advice for schools](#).

The Board of Governors will ensure that the School:

- nominates a member of the Governing Board as a Link Governor for safeguarding follows the statutory guidance in *Keeping Children Safe in Education* (2025)
- engages in inter-agency working in line with *Working Together to Safeguard Children* (2023 updated June 2025)
- pays due regard to the procedures and practice of Southwark SCP
- has an effective and compliant Safeguarding Policy, which is reviewed annually as a minimum.
- carries out annual review of safeguarding
- has a range of other policies in place to ensure the safety of pupils and promote their welfare
- appoints a DSL (and a number of deputies) who has the appropriate status and authority, as well as the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.
- all staff receive appropriate induction and ongoing safeguarding training in accordance with *KCSIE (2025)* and local requirements
- has an effective staff code of conduct
- operates safer recruitment procedures and that a compliant Single Central Register is maintained
- has a clear policy on the use of mobile technology in the School
- has a curriculum in which pupils are taught about safeguarding, including online safety
- does all that it reasonably can to limit children's exposure to the risks from the School's IT system. As part of this process, our governing body will ensure that the School has appropriate filters and monitoring systems in place and regularly review their effectiveness. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place, and manage them effectively, knowing how to escalate concerns when identified. The Board of Governors considers the age range of the children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks.

24.1 Link Governor

The Board of Governors has nominated Dianne Barratt as the Link Governor for Safeguarding. She takes the lead on safeguarding on behalf of the Governing Board and will liaise with the local authority and/or partner agencies on issues of child protection, as appropriate.

The Link Governor maintains a close relationship with the DSL and they meet multiple times each term, often with other relevant staff. They review and monitor the volume and progress of cases where a concern has been raised to ensure that the School is meeting its duties and the Safeguarding Policy is being implemented effectively. This is in addition to, and does not replace, the responsibility that rests with the Head to monitor the work of the DSL.

The Link Governor also conducts an annual Safeguarding Audit during which aspects of the school's practice are examined and any recommendations made. The completed audit is presented to the Board of Governors.

The Link Governor also has a termly meeting with the Human Resources lead with responsibility for the SCR, the Head of the Junior School and the DSL in order to inspect the Single Central Register and review current practice.

The Link Governor attends an annual audit of the filter and monitoring systems in place for IT at the School.

24.2 Annual Review

The Head provides an annual report to the Board of Governors (supplied by the DSL) outlining details of any safeguarding issues that have arisen during the year and the outcome of any cases identified. (These reports respect confidentiality and do not identify any person(s) by name.) This report also provides an audit of trends and data from the year's safeguarding issues.

This policy is available to all parents and potential parents via the website and appropriate pages on The Hub. Staff and pupil feedback about safeguarding issues are incorporated where appropriate.

All complaints arising from the operation of this policy will be considered under the School's complaints procedure, with reference to external agencies if necessary.

25 Use of school premises for non-school activities

Also see the School's [*Third Party Hire, Safeguarding & Child Protection Policy*](#)

When the School hires/rents out (or offers without charge) facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or co-curricular activities) it ensures that appropriate arrangements are in place to keep children safe. The Co-commercial Director is a DDSL and undertakes the necessary vetting and communication for safeguarding purposes.

Should any allegation arise during use by outside organisations, then the normal School safeguarding protocols will apply, and the DSL (or appropriate DDSL) will inform the LADO as part of the management of the allegation.

The Governing Board insists that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensures that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the School roll. The Governing Board ensures safeguarding requirements are included in any transfer of control agreement (*i.e.* lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

The Board of Governors has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the link governor or the Head.

..... Date.....
Chris Stylianou, Chair of Governors

..... Date
Dianne Barratt, Link Governor for Safeguarding

..... Date.....
Jane Lunnon, Head

..... Date
Mel Joel, Designated Safeguarding Lead

Appendix 1

Specific Safeguarding Issues

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

1. Domestic abuse

Domestic abuse

- can be psychological, physical, sexual, financial, or emotional
- can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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

If members of staff have a concern about or knowledge of any domestic abuse incidents, they must share it immediately with the DSL, with a view to referring to appropriate agencies.

Information is available about Domestic abuse and how to get help in Southwark. Southwark Council's support and service provider Solace (020 7593 1290, southwark@solacewomensaid.org) offer free and confidential support for women and men aged 16 or over who are survivors of domestic abuse.

The National Domestic Abuse Helpline (24 hours) 0808 2000 247.

1.1 Operation Encompass

The School works in partnership with the Metropolitan Police and Children's Services to identify and provide appropriate emotional and practical help and support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. The system ensures that when police are called to an incident at a home, the key adult in school (usually the DSL) will be informed before the child or children arrive at school the following day. This ensures that the School has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

In order to achieve this, the police will share information with the DSL of all domestic incidents where a pupil has been present. On receipt of any information, the DSL will decide on the appropriate support the child requires, this should be covert and dependent on the needs and wishes of the child. The School will record and store the

information received in accordance with the record keeping procedures outlined in this policy.

Further information is available via [Operation Encompass](#).

2. Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem; however, staff are well placed to observe pupils day-to-day and to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. Approximately 1 in 10 children aged under 15 years and 1 in 4 adolescents aged 16 & 17 experience mental health problems.

Signs of mental health problems

It is important to recognise that all children and young people are different, and the signs and indicators of mental health difficulties will differ. Some common signs are listed below.

- sadness, or a low mood persisting for two weeks or more
- **Repeated medical symptoms** with no obvious cause *eg* stomach aches & headaches
- increase in irritability, recklessness or aggression
- worries that stop them carrying out day-to-day tasks
- sudden outbursts of anger directed at themselves or others
- not being interested in things they used to enjoy
- feeling tired and exhausted a lot of the time
- inability to concentrate
- lack of confidence
- unable to relax
- changes in weight
- feeling guilty or worthless, talking negatively about themselves
- feeling empty or unable to feel emotions (numb)
- poor self-care
- refusing to go to school and/or decline in academic performance
- thoughts about suicide or self-harming
- actually self-harming, for example, signs of cutting their skin or taking an overdose
- panic attacks
- obsessive or compulsive behaviour
- self-harm
- misuse of drugs or alcohol

Issues that increase the risk of mental health problems include:

- family difficulties
- bullying

- physical, emotional or sexual abuse
- a family history of depression or other mental health problems
- difficult life event *eg* family separation, divorce, a bereavement
- academic problems
- difficulties with peers

If staff have a mental health concern about a child this should be reported to the DSL with a view to obtaining support for the child and referral to appropriate agencies.

Further advice on mental health issues may be found in *Mental Health and Behaviour in Schools*

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

and in *Promoting Children and Young People's Emotional Health and Well-being*

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

3. Child on child abuse (also see School Anti-bullying Policy and Rewards & Sanctions Policy and the Recognition Policy of the AIS)

The School takes a zero-tolerance approach to child-on-child abuse. Children are capable of abusing other children. This can happen both inside and outside of school, and online, and can take many different forms:

- Bullying (including cyberbullying)
- Prejudice-based and discriminatory bullying
- Physical harm (such as hitting, kicking, shaking, biting, hair pulling)
- Causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse
- violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals
- Forcing other children to use drugs or alcohol
- Emotional abuse (blackmail or extortion, threats and intimidation)
- Sexual violence, such as rape, assault by penetration
- Sexual harassment; such as sexual comments, remarks, jokes and online sexual harassment
- Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Sexual abuse (indecent exposure, indecent touching or serious sexual assaults)
- Encouraging other children to engage in inappropriate sexual behaviour
- Forcing other children to watch pornography or take part in sharing of nudes and semi-nude images
- Sexual exploitation – including:
 - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - Photographing or videoing other children performing indecent acts
 - Having an older boyfriend/girlfriend
 - Associating with unknown adults or other sexually exploited children
 - Staying out overnight
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence.

Although it is more likely that girls will be victims and boys perpetrators, all child on child abuse is unacceptable and will be taken seriously. The School does not tolerate such behaviour or pass it off as 'banter', 'just having a laugh'

or ‘part of growing up’. The School recognises that even where there are no reported cases of child-on-child abuse, this does not mean it is not happening.

Staff should be aware that specific groups of children may be particularly vulnerable to child on child abuse. These include children with special needs and children who are lesbian, gay, bi or trans (LGBT). In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT (see section 21 below).

A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this to the DSL following the reporting procedures outlined in this policy.

Depending on the circumstances, a pupil’s behaviour may require a response under child protection procedures rather than behaviour or anti-bullying procedures. If a pupil has suffered or is likely to suffer significant harm, or the alleged abuse would, if proved, be a criminal offence, a referral to Children’s Services and the police will be made. In both the Senior and Junior Schools there are anti-bullying policies (which contain the child on child abuse policy) with the definition of bullying as: *Bullying is the wilful desire to hurt another, physically, verbally or emotionally and to put him/her under stress. The intimidation can be and often is repeated and is usually carried out by those individuals or groups who are more powerful. On-lookers to incidents of bullying can be seen as complicit.*

The anti-bullying policies set out the ways in which the School addresses the negative effect that bullying and child on child abuse can have on the flourishing of individuals. Regularly in the academic year the issue of bullying is raised in assemblies or in tutor time.

The School, thus, has a strong commitment to anti-bullying and will consider all coercive acts and child on child abuse within a safeguarding and Child Protection context. The School recognises that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the School’s Rewards and Sanctions Policy. Alleyn’s aims to minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHE syllabus which develops pupils’ understanding of acceptable behaviour and keeping themselves safe (see below), having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, and their willingness to talk valued. The School will deliver targeted work on assertiveness and keeping safe to any pupil identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. It is important that all our staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Any possible child on child abuse case must be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. The School also notes the DfE’s advice and guidance in [Preventing and Tackling Bullying](#), and follows the advice on cyberbullying in schools:

Cyberbullying: Advice for headteachers and school staff

https://assets.publishing.service.gov.uk/media/62611456e90e07168ad2b1ea/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

The Deputy Head [Pastoral] leads on diversity and inclusion matters and work with all relevant staff. Concerns raised are discussed with the pupil/s to guide on a way to address what could range from a microaggression to an abuse based on race. Members of staff must record any concerns on CPOMS, speak to relevant staff, if appropriate, and guide pupils on next steps. The ability to speak to these members of staff is brought to pupils’ attention via Sectional assemblies.

If the child-on-child relations involves sexual behaviour, pupils are encouraged to speak to a senior member of staff who provides a ‘safe space’ for raising matters of this kind of concern. There is staff training to raise awareness of

the importance of being observant of and reactive to any concerns about sexualised behaviour between pupils. In every classroom the NSPCC Childline number is displayed and the attention of the pupils is drawn via Section Assemblies to that facility available to them, if they have concerns and do not want to report those concerns at school. The Deputy Head [Pastoral] leads on staff, parent and pupil training, working alongside the DSL and the Head of PSHE. These members of staff provide a 'safe space' for pupils to use should they wish to report any concerns about themselves or any other pupil both in person and online. This 'safe space' is advertised to the pupils in assemblies and relevant PSHE and tutor time. The NSPCC helpline number is 0800 136 663 and more information is available at: <https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>

As part of encouraging a healthy, safer lifestyle, Relationships and Sex Educations (RSE) lessons address, for example, how to:

- recognise and manage risks in different situations and then decide how to behave responsibly
- recognise the dangers of child-on-child abuse when pressure from others (including people they know) threatens pupils' personal safety and well-being; including knowing when and where to get help
- apply assertiveness techniques to resist unhelpful pressure
- judge what kinds of physical contact are acceptable and unacceptable
- appreciate what constitutes sexual violence and harassment, and how to react if concerned
- to appreciate the value of emotional literacy and ways of achieving it.

Also see the School's Policy on Relationships and Sex Education (RSE) which follows the statutory guidance from the Department of Education.

<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

4. Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. Sharing nudes and semi-nudes covers the incidents where

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'. The School also notes the DfE's '[Searching Screening and Confiscation Advice](#)' for schools.

The sharing of sexual photos and videos of under 18-year olds with or by adults is a form of child sexual abuse and will be referred to the police.

Staff must

- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (eg if a young person has showed it to you before you could ask them not to), report this to the DSL.

- Do not delete the imagery or ask the young person to delete it.
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

1. Sexual harassment, online sexual abuse and sexual violence

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in our school and The School has appropriate sanctions in place. The School understands that sexual harassment, online sexual abuse and sexual violence still happens in and around the School, even when there are no specific reports. The School works actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. The School ensures that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online and offline.

Staff members are made aware of and have appropriate knowledge of '*Part 5: Child-on-child sexual violence and sexual harassment*' in [Keeping Children Safe in Education](#). All pupils are supported to report concerns about harmful sexual behaviour freely. The School will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is the case. The School will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, girls and LGBT children). The School will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs.

Staff must share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, the School will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. The School will keep comprehensive records of all allegations.

2. Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. The School will handle reports of sexual violence and harassment between children, both on and outside school premises, in line with '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance [Keeping Children Safe in Education](#) and train our staff members accordingly (including teachers delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). The School takes these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, the School will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. If a concern involves potentially criminal behaviour, the DSL or Deputy Head (Pastoral) would contact police immediately to inform them of what is

known and the intended course of action, prior to a formal referral.

On one hand, the School needs to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. The School will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), the School will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

Pupils are encouraged to speak to a senior member of staff who provides a 'safe space' for raising matters of this kind of concern. There is staff training to raise awareness of the importance of being observant of and reactive to any concerns about sexualised behaviour between pupils. In every classroom, the NSPCC Childline number is displayed and the attention of the pupils is drawn via Section Assemblies to that facility available to them, if they have concerns and do not want to report those concerns at school. The Deputy Head (Pastoral) leads on staff, parent and pupil training, working alongside the DSL and the Head of PSHE. These members of staff provide a 'safe space' for pupils to use should they wish to report any concerns about themselves or any other pupil both in person and online. This 'safe space' is advertised to the pupils in assemblies and relevant PSHE and tutor time. The NSPCC helpline number is 0800 136 663 and more information is available at: <https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>

Sexual violence

It is important that staff are aware that children can, and sometimes do, abuse other children in this way. When referring to sexual violence this means sexual offences under the Sexual Offences Act 2003 as described including rape, assault by penetration and sexual assault. A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. Consent is about having the freedom and capacity to choose.

Sexual harassment

- Unwanted conduct of a sexual nature can occur online and offline. When referring to sexual harassment, it is in the context of child-on-child. Sexual harassment is likely to: violate a child's dignity, and/or make
- them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
- Sexual harassment can include:
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about
- clothes and appearance and calling someone sexualised names
- sexual 'jokes' or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes
- displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment (standalone, or part of a wider pattern of sexual harassment and/or sexual
- violence).

It may include:

- non-consensual sharing of sexual images and videos
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence.

Incidents of sexual violence and harassment are always taken seriously and the School ensures that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, the School will work with relevant external agencies to address the issue, which may include a referral to MASH and a report to the Police. (See entry in 8c 'Manage referrals' and 15.1 'Recording safeguarding concerns'.)

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment are not acceptable and will never be tolerated
- not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts.
- Dismissing or tolerating such behaviours risks normalising them.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a pupil or a pupil makes a report to them, they should follow the referral process as set out in this policy. Staff must share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators).

In immediately responding to any concern about sexual violence or harassment, the DSL or DDSL will (in consultation with the Head) take into account of:

- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident?
- is the alleged incident a one-off or a sustained pattern of abuse?
- are there ongoing risks to the victim, other children, or staff?
- any other related issues and wider context

Further information is available in *KCS/E* (2025)

7a. Sexualised behaviour of children

Developmental sexual activity covers those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent. Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. The determination of whether behaviour is developmental or inappropriate will hinge around the related concepts of true consent, power imbalance and exploitation.

7b. Harmful sexual behaviour (HSB)

Children's sexual behaviour exists on a wide continuum ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent (see below). Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. The School considers HSB in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. The School aims to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. The School will work with appropriate agencies to address HSB and to support children displaying HSB.

It is important that the pupils are made aware that:

- the law is in place to protect rather than criminalise them
- it is important to understand intra-familial harms (and any necessary support for siblings following incidents)

Alleyn's School will be part of discussions with statutory safeguarding partners in cases involving concerns about HSB.

Sexualised behaviour should be seen as a continuum ranging from: Normal - Inappropriate - Problematic - Abusive - Violent

Normal behaviour

- Developmentally expected and socially acceptable behaviour
- Consensual, mutual and reciprocal
- Decision making is shared

Inappropriate behaviour

- Single instances of developmentally inappropriate sexual behaviour
- Behaviour that is socially acceptable within a peer group
- Generally consensual and reciprocal
- May involve an inappropriate context for behaviour that would otherwise be considered normal

Problematic and concerning behaviour

- Developmentally unusual and socially unexpected behaviour
- May be compulsive
- Consent may be unclear and the behaviour may not be reciprocal
- May involve an imbalance of power
- Doesn't have an overt element of victimisation

Abusive behaviour

- Intrusive behaviour
- May involve a misuse of power
- May have an element of victimisation
- May use coercion and force
- May include elements of expressive violence
- Informed consent has not been given (or the victim was not able to consent freely)

Violent behaviour

- Physically violent sexual abuse
- Highly intrusive
- May involve violence which is physiologically and/or sexually arousing to the perpetrator
- May involve sadism

It is important for staff to recognise that in young children, behaviour which causes concern may become apparent through their play. Sexualised behaviour which causes concern may indicate that the child has suffered abuse or has witnessed inappropriate material for their age. Any sexualised behaviour which raises concern must be reported to the DSL following the procedures outlined in this policy.

8. Pupils who are sexually active

A child under 13 is not legally capable of consenting to sexual activity and under the Sexual Offences Act, penetrative sex with a child under 13 is classed as rape. If a member of staff becomes aware that a child (whether or not they are a pupil of this school) is involved with penetrative sex, or other intimate sexual activity, there will always be reasonable cause to suspect that the child, whether girl or boy, is suffering or is likely to suffer significant harm and this must be reported to the DSL immediately. The DSL will refer all cases to Children's Services.

Sexual activity under 16 is also an offence. Where there is true consent it may be less serious than if the child were under 13, but may nevertheless have serious consequences for the welfare of the young person. If a member of staff becomes aware that a pupil under 16 is sexually active this must also be referred to the DSL.

Consideration will be given by the DSL as to whether there should be a discussion with other agencies and whether a referral should be made to Children's Services. The DSL will make this assessment using the risk indicators below, as outlined in the London Child Protection Procedures. This will determine how and when information will be shared with parents and the other agencies. All cases will be documented including where a decision is taken not to share information.

Risk Indicators

In order to determine whether a relationship presents a risk of significant harm to a young person, the following factors will be considered:

- Whether the child/young person is competent to understand, and consent to, the sexual activity they are involved in (children under 13 are not legally capable of consenting to sexual activity)
- What the child or young person in the relationship's living circumstances are, whether they are attending school, whether they or their siblings are receiving services from LA Children's Services or another social care agency etc.
- The nature of the relationship between those involved, particularly if there are age or power imbalances as outlined below
- Whether overt aggression, coercion or bribery was or is involved including misuse of alcohol or other substances as a disinhibition
- Whether the child/young person's own behaviour, for example through misuse of alcohol or other substances, places him/her in a position where he/she is unable to make an informed choice about the activity
- Any attempts to secure secrecy by the sexual partner beyond what would be considered usual in a teenage relationship
- Whether methods used to secure a child or young person's compliance and trust and/or secrecy by the sexual partner are consistent with grooming for sexual exploitation. Grooming is likely to involve efforts by a sexual predator (usually older than the child or young person) to befriend a child/young person by indulging or coercing her/him with gifts, treats, money, drugs, developing a trusting relationship with the child/young person's family, developing a relationship with the child or young person through the internet etc. in order to abuse the child/young person
- Whether the sexual partner is known by one of the agencies as having or having had, other concerning relationships with children/young people (which presupposes that checks will be made with the Police)
- Whether the child/young person denies, minimises or accepts the concerns held by professionals.

9. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation: guide for practitioners (2017)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

In summary, CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (eg through others copying videos or images they have created and posted on social media. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners.

Alleyn's School:

- recognises that CSE is never the victim's fault
- educates pupils about CSE in various parts of the curriculum including PSHE
- maintains a culture of good communication to ensure parents and any child worried about CSE
- can speak to the School
- engages with relevant agencies in any detected or suspected case of CSE affecting a pupil
- refers immediately to Children's Services any child under the age of 18 who it suspects may be vulnerable to sexual exploitation
- will, where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, make an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 15, an individual risk assessment will be conducted in accordance with the London Child Protection Procedures.

The indicators related to CCE listed below can also be indicators of CSE, as can children who have older boyfriends or girlfriends, children who suffer from sexually transmitted infections or become pregnant.

10. Crime & Child Criminal Exploitation (CCE)

Indicators, which may signal that children are at risk from, or are involved with serious crime include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries
- unexplained gifts or new possessions.

Fear and a need for self-protection is also a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns.

All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL.

Further advice is available in *Preventing youth violence and gang involvement*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

10.1 CCE indicators

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

10.2 County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing and are subsequently found in areas away from their home; have been the victim or perpetrator of serious violence (*eg* knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters; have their bank accounts used to facilitate drug dealing.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often
- accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults;
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

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

11. Preventing Radicalisation - 'Prevent'

The Prevent lead at Alwyn's is the DSL. The Counter-Terrorism and Security Act 2015 places a duty on specified authorities including schools, to have due regard to the need to prevent people from being drawn into extremism through radicalisation and the possible participation in terrorism ('the Prevent duty' – referred to simply as 'Prevent'). Young people can be exposed to extremist influences or prejudiced views, in particular via the internet and other social media. Schools can help to protect children from extremist and violent views in the same way that they help to safeguard children in other behavioural contexts.

In *KCSIE* (2025), **Extremism** is defined as:

the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and

mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is defined as:

the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

The School recognises that there is no single route to extremism nor is there a simple profile of those who become involved. Thus, attempts to derive a 'profile' can be misleading. It must not be assumed that particular characteristics and experiences will necessarily lead to individuals becoming radicalised, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

Further information is contained in the statutory guidance for Channel Panel members and partners of local panels, *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism*, found at:

https://assets.publishing.service.gov.uk/media/651e71d9e4e658001459d997/14.320_HO_Channel_Duty_Guidance_v3_Final_Web.pdf

General guidance on the Prevent duty can be found her:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

The teaching staff and key operational staff received training from the Southwark Prevent Coordinator in 2019 and further online TES Prevent Training which will also be repeated in Sept 2025, offering further advice and support in Prevent issues. The DSL receives additional information to support the management of the Prevent Duty.

To ensure it meet its obligations under Prevent, the School:

- ensures the DSL receives Prevent training, and trains appropriate staff (including the Head) in Prevent issues
- makes use of LSCP courses and reading matter, and available material including on-line films drawing attention to the risk of Child Sexual Exploitation in radicalisation
- highlights the issues involved in Prevent at both academic and operational staff training sessions, including spotting signs of radicalisation or extremism and identifying Child Sexual Exploitation radicalisation
- ensures staff awareness of the appropriate use of the Channel Panel system.

Alley'n's School also engages in a process of general assessment of risk by:

- maintaining discussion between pastoral staff with a view to identifying pupils with any signs or vulnerability due to behavioural factors
- checking during a pupil's time at the School any possible geographical issues that might be relevant (*eg*, changing address or being aware of holidays spent in vulnerable areas of the world)
- maintaining vigilance about pupil attendance such that any child missing, or with unexplainable absences, from education can be reported to the authorities immediately.

The School also ensures:

- special vigilance about pupils missing from school deploying the electronic registration system to spot problematic absence leading to concerns about absent from education
- vigilance about detecting abusive or derogatory language in the pupils, which may indicate vulnerability to radicalisation and extremism, or an unhealthy attitude to the issue at large in our society, checking especially for racist, homophobic or disability discriminatory language
- if identifies any sign of vulnerability in any of its students, the School makes contact with relevant authorities possibly making a referral to the local Channel Panel or using the DfE dedicated helpline – such referrals do not require parental consent to make but consultation may be judged to be helpful

- it checks that any visiting speaker is always suitably vetted and supervised especially if invited to speak by pupils (where a member of staff must always take responsibility for knowing beforehand the profile of the visitor and take responsibility for the visit)
- there are sessions on fundamental British values designed to raise the issues in Prevent widely in the curriculum, including – but not exhaustively – in PSHE lessons
- there are opportunities for addressing fundamental British values in the co-curriculum and public events like Assemblies, Year group meetings etc.
- reiterating in the IT Policy the particular danger of radicalisation and vulnerability to extremism posed by social media
- there are robust IT protections to keep pupils safe from terrorist and extremist materials when accessing the internet at school
- it refers children at risk of harm as a result of involvement or potential involvement in extremist activity to Southwark Multi Agency Safeguarding Hub (MASH). The MASH will share the referral details of new referrals with the Prevent lead police officer and the Southwark Prevent Coordinator at the point the referral is received.

There is the possibility for any member of staff to contact the local police force using the 101 non-emergency number and a DfE dedicated telephone helpline/mailbox offering non-emergency advice for staff and governors on 020 7340 7264 and online at counter-extremism@education.gsi.gov.uk

The School sees the Prevent duty as part of our school's wider safeguarding obligations and note the revised [*Prevent duty guidance: for England and Wales*](#), especially paragraphs 57-76.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools and colleges to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. In a Prevent referral, the Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

Indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (*eg* the swastika for far-right groups)
- attempts to recruit others to the group/cause/ideology
- communications with others that suggest identification with a group/cause/ideology.

Indicators that an individual has an intention to use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology
- condoning or supporting violence or harm towards others
- plotting or conspiring with others.

Indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include:

- having a history of violence
- being criminally versatile and using criminal networks to support extremist goals
- having occupational skills that can enable acts of terrorism *eg*, civil engineering, pharmacology or construction
- having technical expertise that can be deployed *eg*, IT skills, knowledge of chemicals, military training or survival skills.

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

Additional support

Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue. <https://educateagainsthate.com/>

Preventative education is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. This zero-tolerance will be underpinned by the School's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered through the PHSE programme in regularly timetabled lessons and reinforced throughout the whole curriculum.

12. Children Missing or who are absent from Education

It is a mandatory duty for the School to have in place systems to report children who go missing or who are absent from education. This duty reflects the need to protect those vulnerable to radicalisation or sexual exploitation, or sexual abuse. In September 2016, the government published guidance, https://assets.publishing.service.gov.uk/media/66bf57a4dcb0757928e5bd39/Children_missing_education_guidance_-_August_2024.pdf

KCSIE (Sep 2025) states:

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

Monitoring and reporting longer-term absences in the School is the responsibility of Form tutors and senior Pastoral staff working with sectional administrative staff and Attendance Officer. The DSL, DDSs and Attendance Officer check attendance statistics each month and the electronic register is kept up to date by tutors before each month closes. These processes are ultimately the responsibility of the DSL. Any attendance concern related to the safeguarding and welfare of a child results in an immediate contact with the appropriate Local Authority.

Persistent or unexpected absence are matters of safeguarding concern that staff should be mindful of in their various pastoral, academic or administrative roles.

As a result, Alleyn's School:

- raises staff awareness in training to the danger posed by pupils missing regular education
- has robust procedures for monitoring attendance using the daily register at the start of the school day and monitoring attendance at lessons, and has robust reporting mechanisms if children are absent from expected activity
- monitors the absence list produced daily by the Section Administrators and the AJS Office
- responds quickly to any early signs a pupil has raised anxiety or dips in progress, attendance or engagement in learning, through the pastoral structures in place
- informs the Local Authority when adding/deleting a child's name to/from the School admissions register, having made reasonable enquiries, jointly with the LA, to establish the whereabouts of the child before deleting from the register (except those leaving or arriving at standard transition points)
- reports to the appropriate Local Authority any case of concern about patterns of absence or
- pupils who fail to attend school regularly and at the latest after 10 days of continuous unpermitted absence, are reported to the Local Authority
- informs the LA if pupils are regularly absent
- includes absence data in the formal school reports of Senior School pupils
- contacts the home in cases of unauthorised absence to remind parents of the School protocol on what constitutes authorised absence
- regularly reminds parents of the need for them to inform us of any changes pertinent to keeping the admission register accurate and up-to-date
- arranges full-time education for excluded pupils from the sixth day of a fixed-period exclusion
- brings cases of concern to the DSL for further action if appropriate.

13. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) are aware of contact details and referral routes to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this will not replace a referral into Children's Services where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's Services will be the lead agency for these young people and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing,

Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17-year olds who may be homeless and/or require accommodation.

14. So-called 'honour-based' abuse and violence (HBA)

So-called Honour-based abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider abuse (HBA) network of family or community pressure and can include multiple perpetrators. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If any members of staff have concerns about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they should share concerns immediately with the DSL.

15. Female Genital Mutilation (FGM)

FGM (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. FGM causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child. It is practised by families for a variety of complex reasons but often in the belief that it is beneficial for the girl or woman. The practice is illegal in the UK. It has been estimated that over 20,000 girls under the age of 15 are at risk of FGM in the UK each year, and that 66,000 women in the UK are living with the consequences of FGM.

Some girls may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to 'heal' before they return to school. Some girls may have FGM performed in the UK. FGM is child abuse and a form of violence against women and girls (VAWG) (see below).

Alley's School:

- emphasises that whilst all staff should speak to the DSL (or a deputy DSL) with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf
- Makes clear that staff must, under no circumstances, engage in examining girls for this purpose
- includes the issues raised by FGM in the SS RS curriculum – and what students must do if they suspect another pupil is vulnerable in PSHE lessons
- engages with staff (both academic and support) in training opportunities to raise awareness, especially in addressing signs of abuse specially like FGM
- raises concern in other age-appropriate forums, like Assemblies and occasional talks in Clubs & Societies.

Reporting guidance is provided by the Department of Health (Updated 2020) and is available at:

[*Mandatory Reporting of Female Genital Mutilation – procedural information*](#)". A useful summary of the FGM mandatory reporting duty is available in [*FGM Fact Sheet*](#).

<https://www.gov.uk/government/publications/safeguarding-women-and-girls-at-risk-of-fgm>

16. Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious

violence such as crimes committed in the name of “honour”; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they must share it immediately with the DSL with a view to referring to appropriate agencies. The School also notes [Southwark's VAWG Strategy](#)

17. Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Some perpetrators use perceived cultural practices as a way to coerce a person into marriage. The pressure put on people to marry against their will may be:

- physical: for example, threats, physical violence or sexual violence
- emotional and psychological: for example, making someone feel like they are bringing ‘shame’ on their family.

Any concerns about a possible forced marriage case must be shared with the DSL with a view to referring to appropriate agencies.

In line with advice the School:

- includes material on forced marriage in the curriculum, especially in RSE and PSHE
- trains staff on the matter
- encourages pupils to discuss concerns about friends or themselves with adult members of the community, never treating the allegation as merely a domestic issue and sending the pupil back home
- checks where possible to establish if a vulnerable student possesses two passports with concerns about the safety of an under 18-year old pupil activates safeguarding procedures using multi-agency liaison with police and Children’s Services uses the Forced Marriage Unit in the Foreign & Commonwealth office for support
Telephone: +44 (0)20 7008 0151, Email: fmufco.gov.uk.

The Forced Marriage Unit’s statutory guidance, [The right to choose: government guidance on forced marriage and](#) especially Chapter 7 on page 32 of the [Multi-agency guidelines](#), which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

18. Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17-year olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

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

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

<https://helpwithchildarrangements.service.justice.gov.uk/>

19. Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO <https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative

consequences for those children.

20. Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

The law requires that the local authority should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

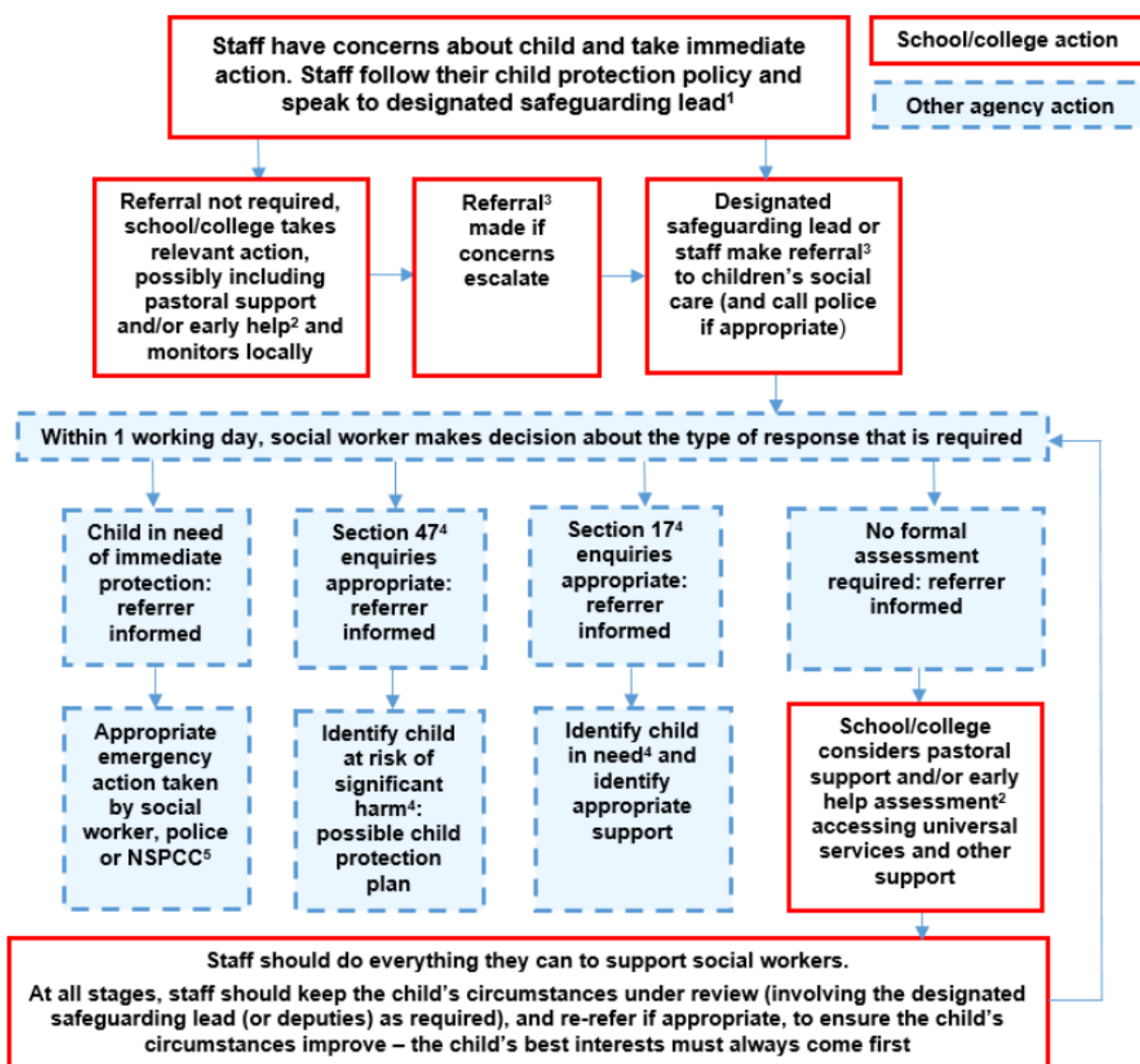
If the School becomes aware of a child in a private fostering arrangement within Southwark, it will notify the council's Multi Agency Safeguarding Hub (MASH) by emailing MASH@southwark.gov.uk or calling 020 7525 1921. Advice about whether there is a need to notify the council, can be obtained by calling 07539 346808 or sending an email to privatefosteringadvice@southwark.gov.uk. In the case of a non-Southwark child, the School will notify the relevant LA.

21. Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory *Relationships Education, Relationship and Sex Education and Health Education* curriculum. The School will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT children.

Appendix 2 (page 24 *KCS/E*2025)

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

Appendix 3

Statutory guidance and other advisory documents informing this policy

1. The Education (Independent School Standards) Regulations (2014)
2. DfE guidance Keeping Children Safe in Education (2025)
3. DfE guidance Disqualification under the Childcare Act (2006)
4. Statutory Framework for the Early Years Foundation Stage (2025)
5. Safeguarding children and protecting professionals in early years settings: online safety considerations (2019)
6. Working Together to Safeguard Children (2023 updated June 2025)
7. Pan London Child Protection Procedures and Practice Guidance (updated March 2025)
8. Guidance from Southwark Safeguarding Children Partnership
9. What to do if you're worried a child is being abused – Advice for Practitioners (2015)
10. Information Sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (May 2024)
11. Prevent Duty Guidance for England and Wales (originally issued March 2015 (updated May 2024)
12. Meeting digital and technology standards in schools and colleges (March 2023)
13. Guidance for safer working practice for those working with children and young people in education settings (Feb 2022)
14. Counselling in schools: a blueprint for the future (Feb 2016)
15. Cyberbullying: Advice for headteachers and school staff (2014)
16. Promoting and supporting mental health and wellbeing in schools and colleges (2024)
17. Mental health and behaviour in schools: departmental advice (2016 updated 2018)
18. Teacher misconduct: the prohibition of teachers (2015 updated Feb 2022)
19. Working Together to Improve School Attendance (2022 updated Aug 2024)
20. The School Attendance (Pupil Registration) (England) Regulations (2024).
21. The Safer Recruitment Consortium (various publications)
22. Meeting Digital and Technology standards in schools and Colleges (2022 updated March 2025)
Generative AI: product safety expectations

Appendix 4

Addendum to Safeguarding and Child Protection Policy for any period of remote learning

This addendum to Alleyn's Safeguarding and Child Protection Policy contains details of our safeguarding arrangements during times of remote provision and support (*eg* COVID-19 outbreak).

This addendum draws upon the DfE guidance "Coronavirus (COVID-19): safeguarding in schools, colleges and other providers (27 March 2020)"; the Model Covid-19 Safeguarding Policy Addendum (Southwark Children's & Adult's Services April 2020) and "Identification of, and planning for, vulnerable pupils during school closure" circulated by Southwark Local Authority in March 2020.

We remind all staff, pupils and parents that the School continues to have appropriate regard for the current guidance on Keeping Children Safe in Education (KCSIE, Sep 2025) despite arrangements for remote provision. The School's Policy on Safeguarding and Child Protection continues to apply.

Specific arrangements during periods of Remote Provision are outlined below under the follow sub-headings:

1. Availability of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) and reporting and recording safeguarding concerns
2. Vulnerable Children
3. Attendance
4. Anti-Bullying and Harmful Peer Relations
5. Supporting Children
6. Safer recruitment and concerns about staff
7. Staff training and safeguarding induction
8. Children transferring schools
9. Data Protection and GDPR
10. Support from the Local Authority (Southwark)
11. Online Safety
12. References to other school policies

1. Availability of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) and reporting and recording safeguarding concerns

Any safeguarding incidents or potential concerns should be reported to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead at the earliest opportunity.

It is of paramount importance that all staff act immediately on any safeguarding concerns by contacting the DSL or a DDSL.

The DSL and DDSLs may be contacted by email or, if urgent contact is required, by phone using the contact numbers in the School's safeguarding and child protection policy.

At times when a trained DSL or DDSL is not physically available on site, a teacher will be instructed to contact the DSL or DDSL using their staff mobile phone numbers.

Safeguarding concerns in the Senior School should be logged by staff on CPOMS once they have been raised with a DSL or a DDSL. They should be marked with the safeguarding category so that the appropriate DSL and DDSL are automatically alerted. Instructions on using CPOMS can be found on the Hub. Junior School staff should raise and log concerns with the Head or Deputy Head of the Junior School.

The Head will be updated about current safeguarding concerns periodically by the DSL or a DDSL via a secure video or audio conversation.

2. Vulnerable Children

'Vulnerable children' include children with social worker involvement, such as looked-after children, children Subject to Child Protection Plan (CPP), children in need (CIN), privately fostered children, *etc.* Closely liaising/working together with allocated social workers is even more important. Further information on vulnerable children can be found in the Government's [guidance on vulnerable children and young people](#). There may be other groups of children who will be vulnerable for various reasons, such as children with education health and care (EHC) plans, young carers and children for whom home life is known to be particularly challenging or high risk, *eg* domestic abuse, substance misuse, parental mental ill health, high levels of neglect and pupils who are under assessment with Children's Social Care, or those for whom referrals have recently been submitted which did not lead to further action.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

The School will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children where applicable. The lead person for this in school will be the DSL.

Each vulnerable child is allocated to a member of the DSL team under the overall supervision of the DSL. Normally this will be the DDSL overseeing the section of the School of which the pupil is a member. In the absence of the allocated member of the DSL team, responsibility for contacting vulnerable pupils may be re-allocated to another DSL, another member of SLT, or delegated to the tutor or Head of House (with guidance from the DSL or a DDSL). The DDSL will make contact with each allocated child on a regular basis to check their safety and wellbeing and a summary of the conversation will be recorded on CPOMS. Any unsuccessful contacts, as well as those that did take place, will also be recorded. Any urgent safeguarding concerns will be escalated immediately through consultation with the Southwark Multi Agency Safeguarding Hub (MASH), or equivalent in another LA, and/or the Police.

There is currently an expectation that vulnerable children who have a social worker will attend school, as long as it is safe for them to do so (i.e. they don't have underlying health conditions that put them at risk). In circumstances where a parent does not want to bring their child to school, and their child is considered vulnerable, the social

worker and school should explore the reasons for this directly with the parent and help to resolve any concerns or difficulties wherever possible. At all times, the School will follow the advice set out by Public Health England.

3. Attendance

Local authorities and schools do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

At Alleyn's, pupils working remotely will be asked to virtually "check-in" each morning via a web form and the list of non-responders will be published to tutors. Tutors will engage with their tutor groups via posts and/or live catch ups and will follow up by emailing individual pupils and, if necessary, parents if they do not hear from individual pupils. In the Junior School pupils will register remotely each day and the list of non-responders published to tutors, who will follow up with parents (under the guidance of the current Head of Infants) over unexplained absences. Schools and social workers will agree with families whether children in need should be attending education provision – and the School will then follow up on any child that the School was expecting to attend, who does not. Schools should also follow up with any parent or carer who has arranged care for their children and the children subsequently do not attend. In all circumstances where a vulnerable child does not take up their place at school, or discontinues, the School should notify their social worker.

The DfE's daily online attendance form should be completed by the Chief Administrative Officer (or person delegated by her) to keep a record of children of key workers and vulnerable children who are attending school.

Any changes to parents' emergency contact information **MUST** be communicated immediately to the School by email to the relevant Section Administrator.

4. Anti-Bullying and Harmful Peer Relations

The principles outlined in the School's Anti-Bullying and Harmful Peer Relations (child-on-child abuse) Policy (including the Junior School version) and those set out in part 5 of *KCSIE* (Sep 2025) continue to apply.

Pupils have received PSHE lessons on cyber-bullying and staying safe online. Pupils have been sent an addendum to the IT acceptable use policy that applies specifically to remote learning and will be sent further updates when required. Parents will be sent guidance on staying safe online.

Pupils are advised that they should be mindful of appropriate peer relations in all of their communications, whether using school systems or not. When using school systems, staff are advised that settings should be adjusted such that pupils cannot delete or edit comments that they have made (in Microsoft Teams). In the Junior School staff are asked to be mindful of comments posted on class chat pages. All pupils will be reminded of these important protocols regularly, *eg* at the start of term.

Pupils should contact their tutor, Head of House, Section Head or a trusted member of staff to discuss concerns regarding cyber bullying or harmful peer relations. It is best practice for two members of trusted staff to contact together individual pupils to hear their concerns, using Microsoft Teams, or through a parent in the Junior School. Parents should be made aware as soon as is reasonably practical.

Where child-on-child relations become a concern between two or more pupils, then a risk assessment should be carried out to consider likely online contact through school systems (*eg* pupils sharing class groups) and adjustments made to protect all parties.

Consideration should still be given, as per the School's policy, as to whether contact needs to be made with outside organisations such as Children's Social Care or the Police. All School sanctions could be applied if this advice dictates that the matter can be dealt with by the School.

Two members of staff provide a safe space for the reporting of concerns about any treatment due to racial differences or behaviours linked to any person from a racial minority. Concerns can be raised in person or by use of an email address set up for a referral. These concerns are discussed with the pupil/s to guide on a way to address what could range from a microaggression to an abuse based on race, to concerns with social issues and more. The members of staff register the concerns on CPOMS, speak to relevant staff, as applicable, and guide pupils on next steps. The ability to speak to these members of staff is brought to pupils' attention via Sectional assemblies.

5. Supporting children

Staff should be familiar with the types of abuse and specific safeguarding matters as outlined in the School's Safeguarding and Child Protection Policy, including grooming and radicalisation (both of which could happen online), cyberbullying, and child-on-child abuse. Staff should be alert to changes in children's behaviour and refer potential concerns to the DSL or a DDSL. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

(a) Supporting children not in school

Remote learning will present new challenges for pupils and their families and may exacerbate existing concerns surrounding anxiety, family relations or feelings of low mood.

Tutors should aim to check in with their tutor groups daily and, in conjunction with Heads of House, arrange joint contact with individual pupils to check on their well-being at regular intervals as they would have done when the School is in normal operation. Parents should be contacted to discuss concerns when required. Concerns should be escalated to the relevant Head of Section using CPOMS alerts or email contact. A communication plan will be established by the relevant Head of Section and staff will record contact via CPOMS. Contact may include email, contact via Microsoft Teams where two members of staff are present in live video or audio conversations, or phone or doorstep contact with prior agreement of the DSL or a DDSL.

In particular, any disclosure by the pupils of low mood, self-harm or suicidal thoughts that are not already being addressed should be raised as an immediate safeguarding concern with the DSL or a DDSL and parents contacted to ask them to keep an eye on their child, with further referral to outside agencies if required. The DSLs will liaise with the School Counsellor and Chaplain as required.

(b) Supporting children in school

Alley's School is committed to ensuring the safety and wellbeing of all its pupils. The School will continue to be a safe space for all children to attend and flourish. This section applies in particular to those children of key workers and vulnerable children who are educated on site.

The School comprises children of a range of ages, and there is supervision in parts of the site at certain times (eg ensuring there is no joint use of changing rooms by different sections of the School).

The School will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety. The School will refer to the Government guidance for education and childcare settings on [how to implement social distancing](#) and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19. The School will ensure that, where we care for children of critical workers and vulnerable children on site, the appropriate support is in place for them.

6. Safer recruitment and concerns about staff

If staff and volunteers have concerns about a staff member or volunteer who may pose a safeguarding risk to children, the guidance given in *Keeping Children Safe in Education* and in the School's Safeguarding and Child Protection Policy continue to apply.

Complaints or allegations made against staff/volunteers must be brought immediately to the attention of the Head (via head@alleyns.org.uk) in order that she may activate the appropriate procedures through the office of the LADO. If the complaint is about the Head, or in the Head's absence, the person to contact is the Chair of Governors. The Chair of Governors, Mr Chris Stylianou, can be contacted c/o the Clerk to the Governors via Clerk@alleyns.org.uk

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the School will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of [Keeping Children Safe in Education \(KCSIE 2025\)](#), including any revised arrangements for ID checking that the Disclosure and Barring Service has advised to minimise the need for face-to-face contact. Under no circumstances should a volunteer who has not been checked (as set out in paragraphs 309 to 316 of *KCSIE 2025*) be left unsupervised or allowed to work in regulated activity.

The School will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult, as per paragraph 350 of *KCSIE 2025*

The School will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of *KCSIE* and the TRA's '[Teacher misconduct advice for making a referral](#)'. During the COVID-19 period all referrals will be made by emailing Misconduct.Teacher@education.gov.uk.

It is essential that the School is aware who, on any given day, will be in School and that the appropriate checks have been carried out. The Single Central Register must continue to be maintained as normal.

7. Staff training and safeguarding induction

Where a DSL or DDSL cannot attend refresher training due to government measures, they will continue to be classed as a trained DSL and DDSL as per the DfE's guidance and will undertake to update their training as soon as is practical thereafter.

Where new staff are recruited, or new volunteers enter the School or college, they should continue to be provided with a safeguarding induction. All should read part 1 and Annex B of *KCSIE* as well as the School's Safeguarding and Child Protection Policy, including this addendum.

In any cases where staff from other schools are temporarily providing support to Alleyn's, the DSL should judge on a case-by-case basis, the level of safeguarding induction required. In most cases, they will already have received appropriate safeguarding training and all they will require is a copy of the relevant School policies and confirmation of our DSL arrangements. The School will seek confirmation from their current employer that:

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

8. Children transferring schools

Where there are pupils transferring between schools during this period (for example where schools provide education to vulnerable children and children of key workers from other schools) the principles set out in *KCS/E* for the transfer of the child protection file to the new school must be followed. As a minimum, receiving schools must have access to a vulnerable child's Education Health and Care plan and details of their social worker.

Whilst schools and colleges must continue to have appropriate regard to data protection and GDPR they do not prevent the sharing of information for the purposes of keeping children safe. Further advice about information sharing can be found on page 177 of *KCS/E* (Sep 2025).

9. Data Protection and GDPR

Guidance should be sought from the COO and Data Privacy Officer **before** any pupil information is passed to external online providers that the School does not already use. Staff should ensure that any software used is suitable for the age groups concerned and that privacy issues have been resolved in advance, and that use is in line with the software provider's terms and conditions.

Pupils will be advised that live sessions will, for the time being and until otherwise notified, be recorded by the teacher and posted in the relevant Microsoft Team for safeguarding reasons and for the benefit of pupils who are not able to attend the session. In the event that pupils or parents object to such recordings, these concerns should be directed to the Bursar; however, the School's view is that this is a necessary, proportionate and lawful step to fulfilling its duty of care to pupils and not something that requires consent or can be opted out of without exceptional reasons (although pupils should be given the chance to opt out of video recording, and this should be respected).

These videos will be deleted from Microsoft Stream after a reasonable period (which may depend on the purposes for which the video is being used), and in any event at the end of the academic year, except where there is some specific lawful purpose to retain longer.

10. Support from the Local Authority (Southwark)

- The LADO: Eva Simcock 020 7525 0689
- Duty telephone number for enquiries/referrals when LADO is unavailable: 020 7525 3297
- The LA's Strategic Lead Officer for safeguarding in education services: Director of Education Nina Dohel 020 7525 3252
- The LA's Schools Safeguarding Coordinator: Apo ÇAĞIRICI 020 7525 2715
- The LA's Safeguarding in Schools Lead: Emma Geiringer 020 7525 5377
- Southwark MASH Duty: 020 7525 1921

- Southwark Family Early Help Service Duty: 0207 525 1922

The School also notes the list of suggestions from Southwark about the arrangements for identification of, and planning for, vulnerable pupils during school closure, circulated in March 2020.

11. Online Safety

The DSL has responsibility for understanding the filtering and monitoring systems and processes in place.

The principles outlined in the School's IT and E-safety policy continue to apply. The IT support team will continue to ensure that appropriate filters and monitoring systems are in place to protect the School's IT systems.

We note the DfE's *Generative AI product safety expectations* guidance which is written to support schools in using generative artificial intelligence safely, and to explain how filtering and monitoring requirements apply to the use of generative AI in education.

Filtering and monitoring in the School is implemented in the following ways:

We use FortiGuard Web Filtering (FGWF) on the Firewall Gateway level to ensure a safer and more productive online environment for our users. FGWF is the highest-rated web filtering service in the industry for security effectiveness. It provides comprehensive threat protection to address threats including ransomware, credential-theft, phishing, and other web-borne attacks. It uses AI-driven behaviour analysis and correlation to block unknown malicious URLs almost immediately, with near-zero false negatives. FortiGuard URL Database is based upon the Web content viewing suitability. The categories for schools to block the access include but are not limited to: Academic Fraud, Adult/Mature Content, Alcohol, Dating, Gambling, Games, Lingerie and Swimsuit, Nudity and Risque, Other Adult Materials, Pornography.

We have also implemented the Impero Education Pro system to provide a further level of internet safety for our users with powerful, keyword detection tools to capture, record and identify early warning signs of harmful online behaviour. Its keyword library index contains thousands of keywords to identify students accessing harmful online content such as suicide, mental health, eating disorders, (cyber) bullying, or any other sensitive topic on their device.

When users are away from the School network (eg chatting on Microsoft Teams) we are covered by Senso Teams Chat Monitoring Safeguarding software. This is a cloud-based system and integrated with an AI based visual threat detection engine. Senso Teams Chat Safeguarding software will monitor chat and inspect images for visual threats and wellbeing, alerting the DSL when indicators are detected.

We use the Darktrace AI-powered cyber security solution, which is highly effective in preventing, detecting, and responding to unusual web activities. For instance, it is able to prevent pupils from accessing VPNs or anonymous proxy websites, installed on BYOD devices to circumvent the School's web filtering system.

We implemented Lightspeed web filtering solution (Lightspeed filter app) to help Junior School pupils manage and monitor internet usage on their iPads used outside of school network. This filter app is designed to enable content filtering and safe browsing on iOS devices by routing internet traffic through Lightspeed Systems' servers for analysis and filtering. The system also provides reporting and monitoring features that administrators can access insights into internet usage patterns, websites accessed, and potential policy violations. This information can help administrators ensure compliance with acceptable use policies and identify any safeguarding issues.

The DSL will hold an annual audit with the relevant members of the IT staff to audit the filtering and monitoring systems and their effectiveness.

At induction, staff will receive appropriate online safety guidance as part of their safeguarding and child protection training, including ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

The School will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually, with the input and awareness of a representative of the Governing Board
- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs
- ensure that an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring should be included in safeguarding training
- ensure the Governing Board reviews the standards and discusses with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

The Governing Board, thus, will assist in reviewing standards and discussing with IT staff (and service providers) what more needs to be done to support the School in meeting the standard in line with the Prevent Duty.

Messages around online safety will continue to be a feature of our pastoral care via tutors and assemblies. The School has recommended to parents that they take reasonable steps to check that their child is staying safe online. The School has advised parents to check the privacy and security settings of home networks carefully. The School has asked that pupils report safeguarding incidents that occur online (such as harmful online content or cyberbullying) to us as soon as possible so that the School may follow them up, and pupils may report harmful online content via the UK Safer Internet Centre at <https://reportharmfulcontent.com>

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk the so-called '4Cs':

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

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

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

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Online teaching will follow the same principles as set out in the relevant staff code of practice/conduct and the School has published specific guidance on remote learning protocols and online safety for staff, including

practices for live remote audio or video contact with individual pupils and live-streaming of audio and visual content (see separate appendix).

The School reminds pupils, parents and carers about the importance of safety online when away from the School, especially in accessing dangerous or inappropriate online sites. This is covered in the PSHE programme in regular reminders to children in different forums.

12. References to other school policies

This addendum serves to provide specific guidance that is particularly relevant in times of remote provision. It should be read in conjunction with the following School policies which continue to apply, and staff should continue to be mindful of and familiarise themselves with these:

- IT and E-safety Policy;
- IT Acceptable Use Agreement for Pupils using School IT facilities;
- IT Acceptable Use Agreement for Staff using School IT facilities;
- IT Acceptable Use Agreement for Staff using School Tablet devices;
- AI Policy
- Taking Storing and Using Images of Children;
- Teaching Staff Code of Practice;
- Junior School Staff Code of Conduct;
- Privacy notice (parents);
- Privacy notice (pupils);
- Privacy notice (staff);
- Anti-Bullying and Harmful Peer Relations (child-on-child abuse).