

Safeguarding and Child Protection Policy and Procedures

But if anyone has the world's goods and sees his brother in need, yet closes his heart against him, how does God's love abide in him? Little children, let us not love in word or talk but in deed and in truth

1 John 3:17-18

Ampleforth College

Person(s) responsible for Policy	Headmaster Designated Safeguarding Lead (DSL)
Ratified By	St Laurence Education Trust (Governors) September 2026
Version Number	v7.0
Date Approved	September 2026
Review Period	As required, and at least annually
Next Review Period	September 2027

Note: all references below to Keeping Children Safe in Education (KCSIE) relate to the 2026 version.

SIX KEY ELEMENTS OF OUR APPROACH TO SAFEGUARDING

- Safeguarding and promoting the welfare of children is everyone's responsibility;
- Ensure immediately the safety of the student - if there is an immediate danger contact the DSL/DDSLs or North Yorkshire Council Emergency Duty Team and /or Police ([contact numbers here](#));
- Ensure the student receives medical treatment, if necessary;
- Listen without interrupting or asking leading questions. Do not investigate. [See the Six Rs flowchart](#)
- Do not promise confidentiality
- Inform the DSL/DDSLs and [record details](#) of events and actions on the College's safeguarding platform (CPOMS) or using the [Safeguarding Concern Reporting form](#).

Contents

1.	Purpose of the Policy	5
2.	Definition of Safeguarding	6
3.	Mission Statement	6
4.	Statutory Duty	8
5.	Safeguarding Contact Details (including DSL cover arrangements)	9
6.	External Contacts in the Event you need to take Urgent Action	12
7.	Key Governors	14
8.	Reporting and Record Keeping	14
8.1	What to do if someone makes a disclosure:.....	15
8.2	What to do if you suspect a student is suffering or likely to suffer harm	16
8.3	Reporting a concern about a student:	17
8.4	Reporting a concern about a member of staff:	18
9	Types of Abuse.....	19
9.1	Physical abuse	20
9.2	Emotional abuse.....	20
9.3	Sexual abuse	20
9.4	Neglect.....	21
10	Concerns about a Student.....	21
10.1	Students for Whom an Early Help/Family Help Assessment is appropriate and may be beneficial	21
10.2	A Child in Need.....	22
10.3	Student at Risk of Immediate Harm	22
10.4	Student at Risk of Radicalisation	23
10.5	Serious Violence and Weapons-Related Concerns	24
10.6	Student Missing from Education.....	24
10.7	Elective Home Education (EHE)	24
10.8	Alternative Provision and children at risk of exclusion	25
11.	Child Exploitation - Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), including County Lines and Modern Slavery	25
11.1	Child Criminal Exploitation (CCE).....	25
11.2	Child Sexual Exploitation (CSE)	26
12	Domestic Abuse and Teenage Relationship Abuse.....	26
13	Child-on-Child Abuse (including harassment and violence).....	27
13.1	Minimising the Risk of Child-on-Child Abuse.....	30
13.2	Reporting concerns of child-on-child abuse.....	30
13.3	How allegations of child-on-child abuse will be recorded, investigated/managed	30
13.4	How victims, perpetrators and any other affected children will be supported.....	30
13.5	Issues to consider when responding to allegations of child-on-child abuse.....	31

14	Online Safety.....	32
15	Safeguarding SEND Students	36
16	Safeguarding children with medical needs	37
17	Safeguarding and the needs of LGBT Students.....	37
18	Gender Questioning Children.....	37
19	Restrictive interventions, including use of reasonable force	38
20	Boarding and Residential Accommodation	38
21	Safeguarding and Mental Health.....	38
22	Students who are, or who have been, Looked After Children and children with a social worker, care leavers and children in kinship care	39
23	Students Reporting Honour Based Abuse (HBA).....	40
24	Allegations about Members of Staff, including volunteers, contractors, trainee teachers and supply teachers	40
24.1	Concerns that may meet the harm threshold	41
24.2	Low-level concerns	42
24.3	Reporting low-level concerns.....	42
24.4	Responding to reports of low-level concerns.....	42
24.5	Recording low-level concerns	42
24.6	Reviewing the records of low-level concerns	43
24.7	Self-reporting of low-level concerns	43
25	Whistleblowing.....	43
26	Management of Safeguarding.....	44
26.1	The Safeguarding Review process (For further details, see Appendix C).....	44
26.2	The Students with Complex Needs Meeting. (For further details, see Appendix D.).....	44
26.3	Monitoring.....	44
27	Safer Recruitment.....	44
28	Visitors	46
29	Duties under the Human Rights Acts (1998) and the Equality Act (2010)	46
30	Staff Code of Conduct	46
31	Responsibilities of Staff Members.....	46
32	Teaching Safeguarding	47
33	Responsibilities of the DSL.....	47
33.1	Management of referrals	48
33.2	Working with others	48
33.3	Undertaking training.....	49
33.4	Raising Awareness.....	50
33.5	Transferring the Child protection file.....	51
33.6	Being available	52

33.7	Providing support to staff.....	52
33.8	Understanding the views of children	52
34	Data Protection and General Data Protection Regulations (GDPR).....	52
35	Safeguarding Arrangements when the College’s Premises are Leased by External Bodies to Provide Services to Children who are not Enrolled at the College	53
36	Regulations and safeguarding requirements relating to school premises - Toilets, Changing Rooms, Showers and Sport	54
37	Governor Arrangements for Safeguarding	54
	Appendix A: Safeguarding Concern Reporting Form	56
	Appendix B: Signs of Abuse, Neglect and Exploitation	58
	Appendix C: Safeguarding Review	60
	Appendix D: Students With Complex Needs Meeting.....	60
	Appendix E: Other policies relevant to Safeguarding.....	61
	Appendix F: Safeguarding in External Lettings and Public Use of College Facilities	63
	Appendix G: Staff dealing with disclosures.....	65
	Appendix H: Other statutory legislation	66

1. Purpose of the Policy

- This policy applies to all staff, visitors and volunteers at Ampleforth College (the College) and is designed to ensure the welfare of students and visiting young people both at the College and on authorised activities away from the College such as school trips and expeditions. The policy is reviewed and updated annually or when required by legislative change.
- We operate our safeguarding processes with the best interests of the student at their heart. We are proud to operate a culture of safety, equality, openness and protection. We manage this by encouraging students to be open and frank about their concerns and providing support for them from the safeguarding team or other responsible adults, such as their Housemasters and Housemistresses and tutors, in all child protection and safeguarding matters.
- There is an important distinction between action required to ensure the welfare of children who need additional support and urgent action to safeguard children who have suffered or are likely to suffer significant harm. If a child is in immediate danger or is at risk of harm, staff members must contact the DSL/DDSLs or call North Yorkshire Council (NYC) Emergency Duty Team and /or the Police immediately ([contact numbers here](#)). **Anyone can make a referral** although the DSL/DDSLs must be informed as soon as possible that a referral has been made.
- Staff must give due concern to possible safeguarding issues arising out of the location and nature of the College site. Training and risk assessments promote and inform this.
- References to other College policies or procedures in this policy should be read as references to those policies or procedures from time to time in force (and as amended or superseded).
- This policy gives very clear instructions regarding what staff members must do if they hear or see anything which gives concern that a student at the College may be at risk of harm, abuse or neglect. See the four flowcharts
 - The Six Rs
 - What to do if you suspect a pupil is suffering or likely to suffer harm
 - How to report on the safeguarding platform (CPOMS)/reporting form
 - How to report a concern about a member of staff
- Guided by Keeping Children Safe in Education (KCSIE), we use the terms “**must**” and “**should**” throughout this policy. We use the term “must” when the person in question has a legal or regulatory requirement or where you are required to behave in a certain way, and use “should” when the guidance/advice in this policy should be followed unless there is good reason not to (and in any such cases, you are required to record on the College’s safeguarding platform (CPOMS), or using the Safeguarding Concern Reporting Form why you have deviated from this policy).

2. Definition of Safeguarding

- Safeguarding and promoting the welfare of children (anyone who has not yet reached their 18th birthday) is defined by Working Together to Safeguard Children (2026), p.6 as:
 - providing help and support to meet the needs of children as soon as problems emerge
 - protecting children from maltreatment, whether that is within or outside the home, including online
 - preventing impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
 - taking action to enable all children to have the best outcomes.
- The College fully recognises its responsibility to safeguard and promote the welfare of all its students. Schools, colleges and their staff have an important role in the wider legislative and regulatory framework which seeks to promote the welfare of all children. **Safeguarding and promoting the welfare of children is everyone's responsibility.** In order to fulfil this responsibility effectively, we make sure our approach is **child-centred**. This means that we consider, at all times, what is in the **best interests of the child**.
- Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm.
- Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of physical abuse, emotional abuse, sexual abuse, exploitation or neglect. All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children should be treated any less favourably than others in being able to access services which meet their particular needs.
- The College fully recognises its duty to reassure victims that they are being taken seriously and that they will be supported and kept safe; and that a victim should never be given the impression that they are creating a problem by reporting any form of abuse; and nor should a victim ever be made to feel ashamed for making a report.

3. Mission Statement

The first word of the rule of St Benedict is 'listen'. Staff must make time to listen to students' concerns in order to protect them and ensure that they flourish. As Pope Francis stated, the effective protection of children and a commitment to ensure their human and spiritual development, in keeping with the dignity of the human person, are integral parts of the Gospel message that the Church and all members of the faithful are called to spread throughout the world. Staff must take a child-centred approach and ensure that students have a voice and are able to express any concerns that they may have. Staff must take an '**it could happen here**' approach and must always take the concerns of students seriously. Safeguarding trumps

everything else – adults must, without fail, make time to listen to any student who shows signs of distress or who wishes to confide in them. Safeguarding is the responsibility of all adults in the College. The nature of our provision and our location must be taken into account by staff.

The following provide some key examples:

- Boarding school: our 24/7 responsibility for our boarders in term time.
- Rural location: the more remote location of the College provides many opportunities and intrinsic protective factors; however, the large campus and specific opportunities for sports and cocurricular activities which this brings is associated with additional risk which must be considered appropriately.
- Shared facilities – students access the St Albans Sport Centre and the Ampleforth Abbey Church which are both used by the public. Risk assessments are in place to help manage safeguarding.
- Proximity to public areas: the campus is adjacent to Ampleforth Abbey and Monastery which includes a retreat centre. There is a public footpath which runs adjacent to the sports fields. There are specific policies and risk assessments in place to help manage safeguarding risks arising out of this proximity.

We are committed to ensuring the following at the College with regards to safeguarding:

- All students at the College are and feel safe, secure and listened to
- Staff/volunteers understand the safeguarding policy; are confident in and understand how to report concerns; they understand the student behaviour policy and the staff code of conduct
- Staff understand that in ‘exceptional circumstances’ they must report concerns directly to NYC Emergency Duty Team or the Police (see here)
- All staff are able to identify welfare concerns among students and to identify students who need additional support
- Consideration of safeguarding issues are part of the planned curriculum. Through Christian Living (PHSE) topics, tutorials, and discussions in Houses, students gain an understanding of what constitutes acceptable or unacceptable behaviour on the part of adults or other students. We support them in developing their own self-confidence and assertiveness, including awareness of the age of consent and abuse of trust. They are informed about this policy and of the various sources of help available at school – including the DSL/DDSLs, the Infirmary, School Counsellors, House Chaplains, the College’s Independent Person, Housemasters and Housemistresses, Matrons, Tutors and other staff.
- Relationships and Sex Education (RSE) is embedded within the Christian Living programme. RSE aims to support young people through their physical, emotional and spiritual development, helping them make the transition from childhood through adolescence to adulthood, with confidence. The programme guides students towards responsible and informed decisions on leading healthy, respectful and independent lives and refers at all times to the teaching of the Church on love, commitment, acceptance and inclusion. The importance of loving friendships and understanding of the qualities of lasting friendship, which include attributes such as consent, conflict resolution and discretion, are emphasised. The personal and social skills that are required for healthy relationships such as managing emotions, empathy for others and awareness of prejudice (including on LGBT issues) are developed throughout the curriculum. The curriculum

also offers guidance on identifying toxic relationships, coercion, abuse and harassment and child-on-child abuse. Students are supported in learning to value and respect each person as a unique individual of equal worth.

- The College has student Wellbeing Ambassadors who are trained and School Monitors who have undergone safeguarding training. House deanery groups provide an additional safe-space for discussion. Students are also made aware of external sources of support, including Childline and the NSPCC.

4. Statutory Duty

All staff must read Part One (Annex A removed).

This policy has been drafted to have regard to Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014.

Other key legislation and guidance include:

Primary Legislation

- Children Act (1989)
- The Human Rights Act (1998)
- Education Act (2002)
- The Equality Act (2010)
- Sexual Offences Act (2003)
- Children Act (2004)
- Counter-Terrorism and Security Act (2015)
- Serious Crime Act (2015)
- Children and Social Work Act (2017)
- Data Protection Act (2018)

Official guidelines from HM Government

- Education (Pupil Registration) Regulations (2006)
- What to do if you're worried a child is being abused (HMG, 2015)
- Children Missing Education (DfE 2016)
- Preventing and Tackling Bullying (DfE, 2017)
- The Designated Teacher for looked after and previously looked-after children: Statutory guidance on their roles and responsibilities (DfE, 2018).
- Searching, screening and confiscation (DfE, 2022)
- Information sharing advice for safeguarding practitioners (HMG, 2018)
- Mental Health and Behaviour in Schools (DfE, 2018)
- Teaching Online Safety in School (DfE 2019)
- Home Office: Domestic Abuse, Statutory Guidance (July 2022)
- National Minimum Standards for Boarding (2022)
- Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings (DfE 2022)
- Working Together To Safeguard Children (DfE, 2026)
- Meeting Digital and Technology Standards in Schools and Colleges (DfE, 2023)
- Prevent Duty Guidance: Guidance for Specified Authorities in England and Wales (HMG, 2023)

- [Gender Questioning Children. Non-statutory guidance for schools and colleges in England. Draft for consultation \(DfE, 2023\)](#)
- [Arranging Education for children with health needs who cannot attend school \(DfE 2023\)](#)
- [Mobile phones in schools \(DfE 2026\)](#)
- [Data Protection in Schools \(DfE, 2024\)](#)
- [Working together to improve school attendance \(DfE, 2026\)](#)
- [Arranging Alternative Provision \(DfE 2025\)](#)
- [Keeping Children Safe In Education \(DfE 2026\)](#)
- [Crime and Policing Act \(DfE, 2026\)](#)
- [Children's Wellbeing and Schools Act 2026](#)
- [Protective Security and Preparedness for Education Settings \(DfE, 2025\)](#)

North Yorkshire Safeguarding Children Partnership and Council guidance

- [North Yorkshire Safeguarding Children Partnership \(NYSCP\) Safeguarding Procedures and Practice Guidance](#)
- [North Yorkshire Council Ladder of Intervention; supporting children and young people with Social, Emotional and Mental Health Difficulties in Schools \(Sep 2019\)](#)
- [North Yorkshire Community Safety Partnership Working with Individuals Vulnerable to Extremism \(2019\)](#)
- [NYSCP: Managing Allegations against those who volunteer or work with children \(2020\)](#)
- [NYSCP: Framework for decision-making: Right help, at the right time by the right person \(Threshold Guidance\) \(2022\)](#)

Approved guidance from other agencies

- [Independent School Standards Regulations 2019 \(ISSRs\) – statutory regulations](#)
- [When to Call the Police, Guidance for Schools and Colleges \(NPCC, 2020\)](#)
- [Sharing Nudes and Semi-Nudes: Advice for education settings working with children and young people \(UKCIS, 2020\)](#)
- [Guidance for Safer Working Practice for Adults who work with Children and Young People in Education \(2022\)](#)

5. Safeguarding Contact Details (including DSL cover arrangements)

The College's Designated Safeguarding Lead (DSL) is Matt Glendon-Doyle. He is the primary point of contact for any safeguarding matter relating to students. He is also responsible for Online Safety, is the Prevent Officer and the Key Adult for Operation Encompass Notifications. If he is not available, one of the DDSLs listed below are the next points of contact where you have concerns about a child. As per guidance in KCSIE 2026, when the DSL is absent, cover arrangements are clear, reliable and known. All staff are emailed about cover and the College also uses a shared email inbox (dslteam@ampleforth.org.uk). If, for any reason, contact fails, and you are concerned that a student is in immediate danger, you must contact NYC Emergency Duty Team and /or the Police immediately [contact numbers here](#)).

The table below also provides details of the Designated Teacher for Children with Looked After Needs, Helen Pepper. He has overall responsibility for their welfare and progress. In addition to this, he will have up to date assessment information from the relevant local authority, their most recent care plan and contact arrangements for parents and carers.

Finally, where staff have concerns about a member of staff and their behaviour or conduct towards a child, they must contact the Headmaster (as below) and if the concern is about the Headmaster, staff must contact the Chair of Governors (through the Clerk) ([see the flowchart here](#)). (Further guidance on determining whether a concern about a staff member reaches the LADO harms threshold, or whether it is a Low-Level concern, can be found overleaf.)

Role	Name	Contact Details
Designated Safeguarding Lead (DSL)	Mr Matthew (Matt) Glendon-Doyle (Deputy Head Pastoral & Safeguarding) 	mgd@ampleforth.org.uk Telephone number (term time): 01439 766434 Mobile number (term time): 07896 006862 Out of hours/term contact number: 07896 006862
Deputy Designated Safeguarding Lead (DDSL)	Mrs Miriam Cook (Assistant Head) 	mcco@ampleforth.org.uk Telephone number (term time): 01439 741116 Mobile number (term time): 07581 044842 Out of hours/term contact number: 07581 044842
Deputy Designated Safeguarding Lead (DDSL)	Angie Carey 	alc@ampleforth.org.uk Telephone number (term time): 01439 741116 Or via Teams
Deputy Designated Safeguarding Lead (DDSL)	Ceri Dent 	crmd@ampleforth.org.uk Telephone number (term time): 01439 766735 Or via Teams

Role	Name	Contact Details
Deputy Designated Safeguarding Lead (DDSL)	Catherine Skinner 	catherine.skinner@ampleforth.org.uk Telephone number (term time): 01439 741114 Mobile number (term time): 07866 127228 Or via Teams
Deputy Designated Safeguarding Lead (DDSL)	Gabrielle Foster 	gabrielle.foster@ampleforth.org.uk Via Teams
Designated Teacher for Looked After Children	Helen Pepper (Deputy Head Academic) 	Helen.pepper@ampleforth.org.uk Telephone number (term time): 01439 766411 Mobile number (term time): 07966 178218
Where a concern is about a member of Staff		
Headmaster	Jon Mutton 	headmaster@ampleforth.org.uk Telephone number (term time) 01439 766880
Where a concern is about the Headmaster		
Chair of Governors	Edmund Craston 	c/o Clerk to the Governors Mr Rowland Hills rhi@ampleforth.org.uk Telephone number: 01439 766000

6. External Contacts in the Event you need to take Urgent Action

If there is an immediate risk of harm to children call North Yorkshire Police	999 or 101
North Yorkshire Safeguarding Children Partnership (<i>for concerns about a child</i>)	0300 131 2 131 social.care@northyorks.gov.uk
North Yorkshire Council Local Authority Designated Officer (LADO) (<i>for concerns about a staff member or volunteer</i>)	01609 533080 lado@northyorks.gov.uk
North Yorkshire Community-based early help and targeted early help (Family Help) - Ryedale	01609 534852
Children Missing in Education	Safeguardingunit@northyorks.gov.uk 01609 532477
School Attendance – Ryedale	Victoria Nightingale 07989727550 victoria.nightingale@northyorks.gov.uk
Virtual School	Headteacher Julie Bunn virtualschool@northyorks.gov.uk 01609 532169 07974 176030
Prevent Channel (countering radicalisation and extremism)	Principal Safer Communities Officer (Community Safety and Prevent) Lesley Gray lesley.gray@northyorks.gov.uk Tel: 01609 533487 Non-emergency DfE advice Tel: 0207 340 7264 Email: counter-extremism@education.gsi.gov.uk
Operation Encompass (Domestic Violence)	Helen Graham MAST Administration Officer, North Yorkshire Children and Families Service, County Hall, Northallerton, North Yorkshire DL7 8AD Tel: 101. Option 2, then dial 35355 MAST office 01609 643573 (internal 13573)
CAMHS Crisis Service	Ryedale: TEWV All age Line: - 0800 0516171 (Option 2 then option 4) 7 days a week, 24 hours.
Healthy Child Service for children and young people 6-19 years old	03003 030 916. www.northyorks.gov.uk/healthy-child-service

IDAS (Independent Domestic Abuse Service)	Tel: 03000 110 110 https://www.idas.org.uk/
CEOP (National Crime Agency Child Exploitation and Online Protection)	https://www.ceop.police.uk/Safety-Centre/
UK Safer Internet Centre	Tel: 0344 381 4772 Email: helpline@saferinternet.org.uk

Useful contacts for children and young people

CEOP Education (online safety)	https://www.ceopeducation.co.uk/
Childline	Tel: 0800 11 11 www.childline.org.uk
Young Minds Text service	Text YM to 85258 https://www.youngminds.org.uk/young-person/find-help/
Compass Phoenix (North Yorkshire's free, confidential health and wellbeing counselling service)	Tel: 01904 661916 Tel: 0800 008 7452 Email: phoenix@compass-uk.org https://www.compass-uk.org/services/compass-phoenix/
Papyrus (suicide prevention for young people)	Tel: 0800 0684141 Text: 07860 039 967 Email: pat@papyrus-uk.org
Samaritans	Tel: 116123 https://www.samaritans.org/how-we-can-help/contact-samaritan/
Office of the Children's Commissioner	Tel: 0800 528 0731
Cyber Choices Programme (National Crime Agency programme to divert young people from online criminality)	https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices

Whistleblowing

NSPCC Whistleblowing helpline	Tel: 0800 028 0285 Email: help@nspcc.org.uk
Charity Commission	Email: whistleblowing@charitycommission.gsi.gov.uk

7. Key Governors

Chair of Governors	Edmund Craston 	c/o Clerk to the Governors Mrs Hester Sowerby hes@ampleforth.org.uk Telephone number: 01439 766000
Nominated Safeguarding Governor	Mrs Sarah Sadler 	ssa@ampleforth.org.uk Telephone number: c/o 01439 741113

8. Reporting and Record Keeping

Any safeguarding concern about a student (other than as set out below in cases of suspected immediate risk of harm) must first be logged on the College's safeguarding platform (CPOMS) or reported using the [Safeguarding Concern Reporting Form](#) (see [flowchart](#) below). The DSL or one of the DDSLs will then triage it (decide the priority level) by allocating it a case manager.

If staff feel a student is **at risk of immediate harm** they must contact the DSL/DDSLs directly by phone, Teams or in person without delay, and before logging it on the College's safeguarding platform (CPOMS); or staff can make an immediate referral to NYC Emergency Duty Team and/or the Police [[see contact details here](#)] **Anyone can make a referral**. Staff must inform the DSL/DDSLs as soon as possible that a referral has been made.

The DSL/DDSLs will retain accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.

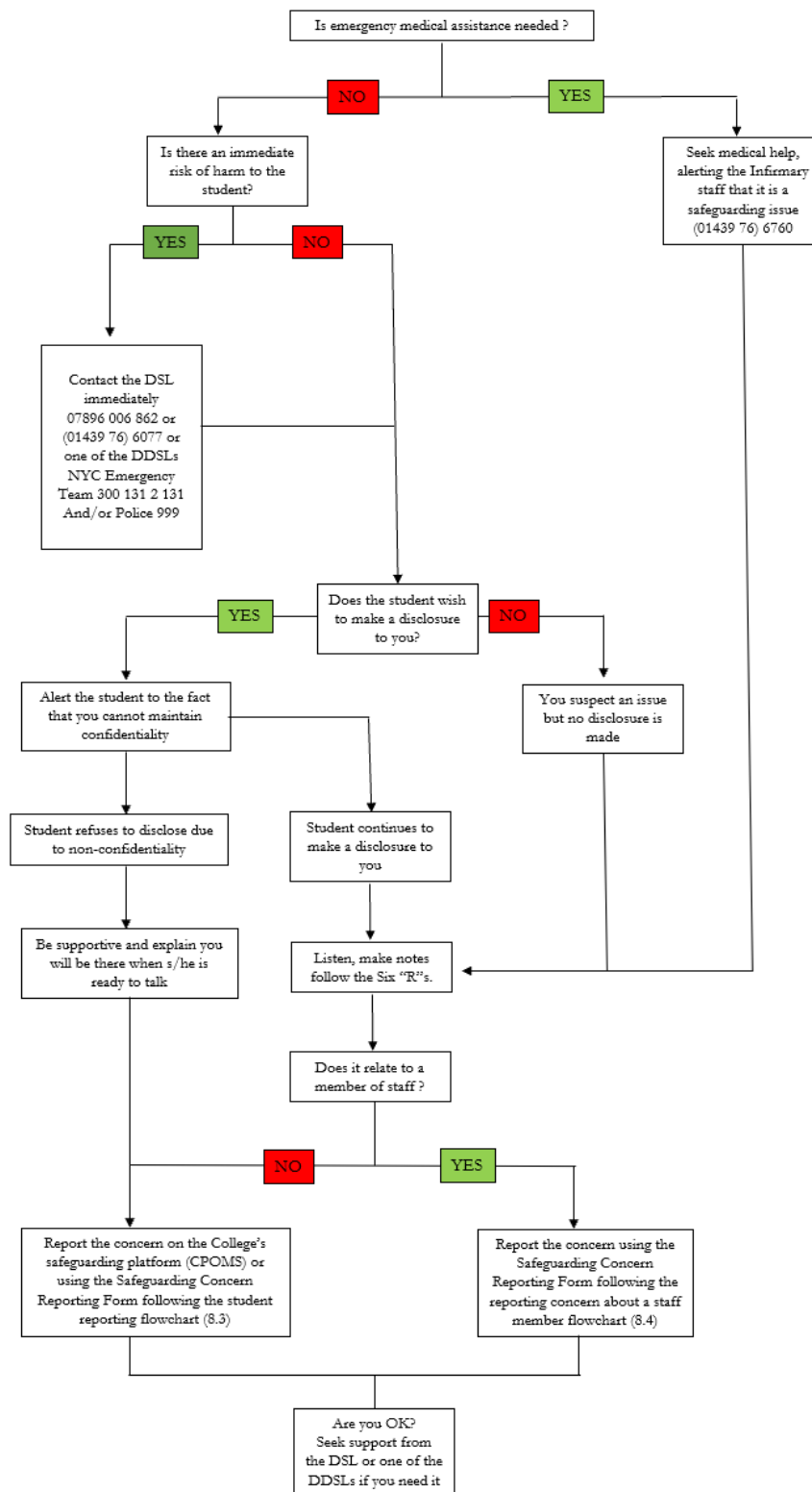
All records are kept securely away from other student files. If a student leaves the College to join another school or Sixth-Form college then a secure transfer of safeguarding records will occur as soon as possible.

Procedures:

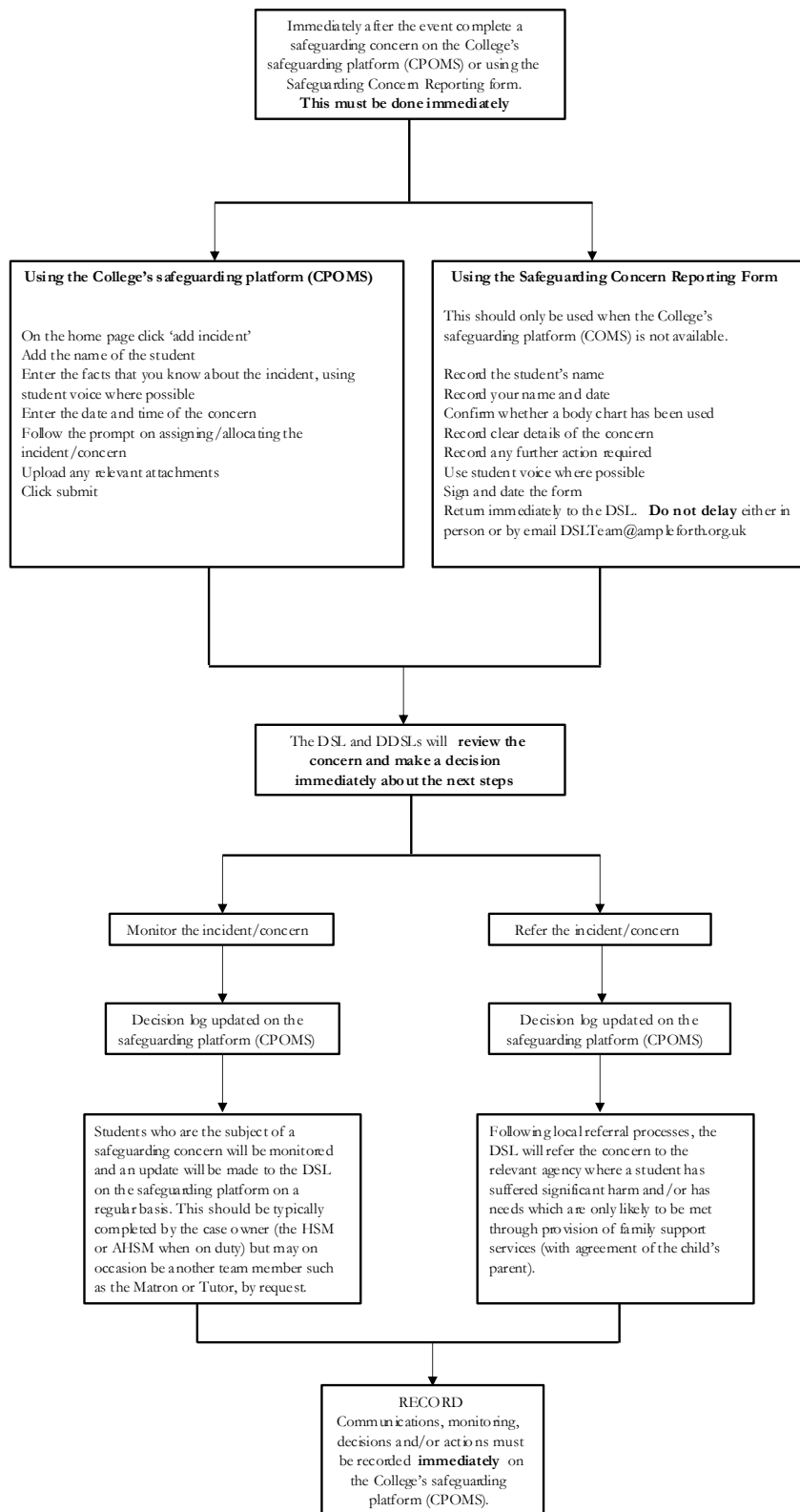
8.1 What to do if someone makes a disclosure:



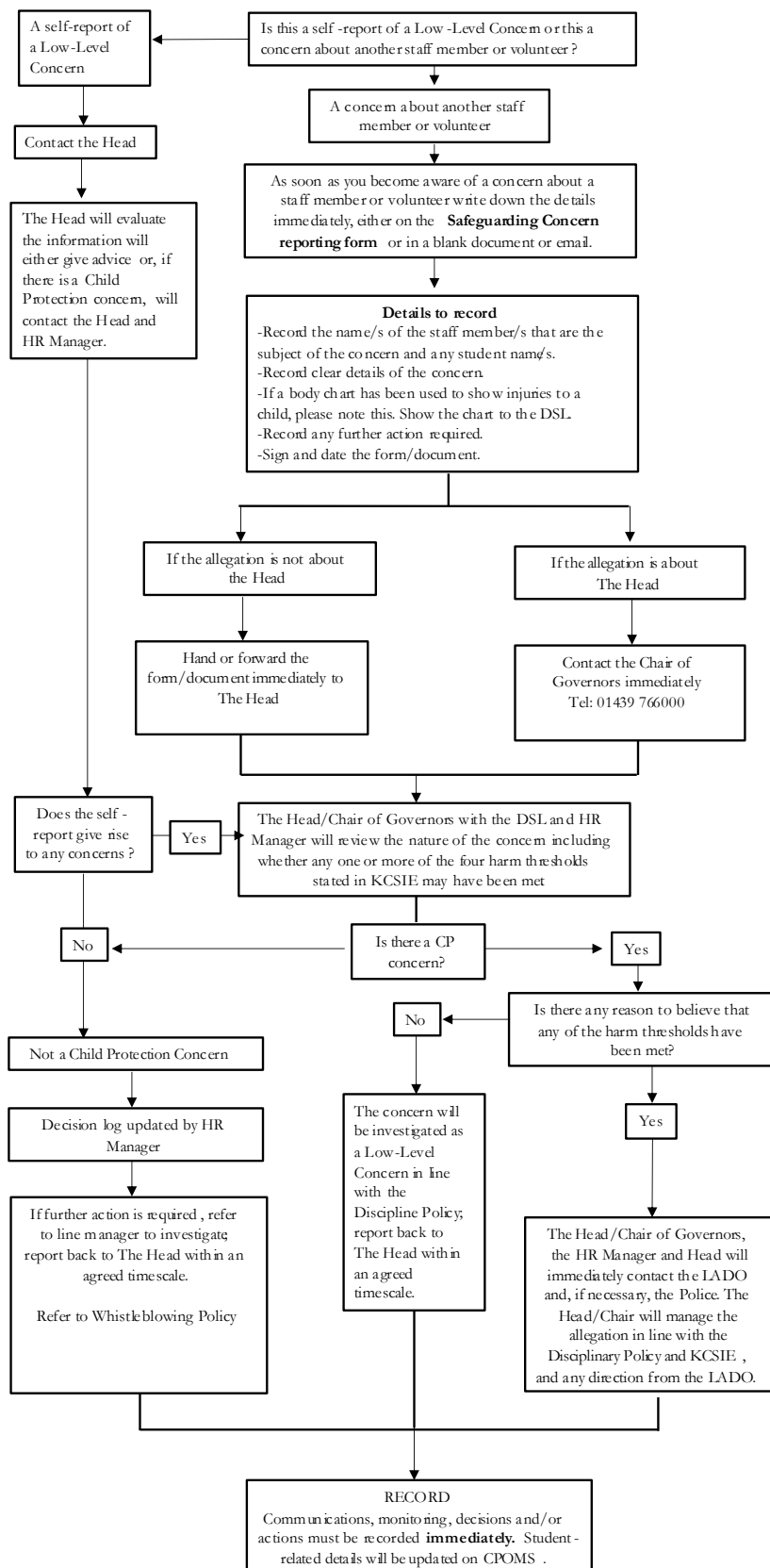
8.2. What to do if you suspect a student is suffering or likely to suffer harm



8.3 Reporting a concern about a student:



8.4 Reporting a concern about a member of staff:



9 Types of Abuse

Abuse involves maltreatment of a child. The definition of child abuse is wide in order to cover all forms of cruelty that children may endure in their lives. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can happen wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Harm can include ill treatment that is physical, as well as the impact of witnessing ill treatment of others (particularly the impact on children of all forms of domestic abuse).

Abuse can take four main forms:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL/DDSLs should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to):

- sexual abuse (including harassment and exploitation),
- domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking),
- criminal exploitation, including financial exploitation (KCSIE para. 21) and modern slavery (KCSIE para. 19)
- serious youth violence, county lines and radicalisation,
- child harm or abuse of parent or carer (KCSIE para. 25).

Staff are aware that children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Staff are aware that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Staff are aware that safeguarding issues often overlap and can put children at risk including the following behaviours and indicators that can be signs that children are at risk:

- unexplainable and/or persistent absences from education
- drug taking and/or alcohol misuse
- serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
- consensual and non-consensual making or sharing of nudes or semi nudes.

KCSIE 2026 para. 17 highlights a new duty for all staff to recognise racism, faith-based prejudice, and other discrimination as harm in its own right. New para. 32 also states that racism and faith-targeted abuse can significantly affect a child's welfare, wellbeing and sense of safety

9.1 Physical abuse

This is 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.

9.2 Emotional abuse

This is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling. 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of others. 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.

9.3 Sexual abuse

This involves forcing or enticing a 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 penetration with an object) 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.

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.

KCSIE para. 28 widens the definition of sexual abuse to "forcing, causing or inciting", with new lines confirming children are more likely to know their abuser than not, and that under-13s can never legally consent to sexual activity.

9.4 Neglect

This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of health or development. 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 carers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

10 Concerns about a Student

Concerns about a student may fall into one or more of several categories, of which the most important are as follows:

10.1 Students for Whom an Early Help/Family Help Assessment is appropriate and may be beneficial

Some students may benefit from an Early Help/Family Help Assessment, and staff are expected to be able to identify such students where possible. Staff at the College should be particularly alert to students with any one of more of the following needs:

- 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 – note possible impact on attendance, attainment, behaviour and wellbeing.
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- is frequently missing/goes missing from 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 parent or carer in 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.
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child.
- KCSIE 2026 includes new risk indicators for students who: are repeatedly removed from classroom; had multiple exclusions; on part-time table; are pregnant or a parent; show early signs of abusive/violent; display harmful behaviours.

Early Help/Family Help may also be an appropriate pathway in circumstances where a student has been subject to repeated temporary exclusions or is at risk of permanent exclusion.

Early Help/Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, if staff consider that a student may benefit from early help/Family Help they must log this on the College's online safeguarding platform (CPOMS). The DSL/DDSLs will consider the appropriate action to take in accordance with the North Yorkshire Children's Services referral thresholds. This may include appointing an 'early help champion' who may complete an initial Early Help/Family Help Assessment form.

When considering the appropriate level of intervention, the College will refer to Local threshold guidelines, including the North Yorkshire Council Ladder of Intervention (2019).

Further details on Early Help/Family Help can be found [here](#).

10.2 A Child in Need

This refers to a student whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential, as defined by The Children Act (1989), Section 17 (10). These students will be referred to Children's Services and will benefit from additional support which will be put in place as soon as a problem is identified. The College or the North Yorkshire's Children's Services team may also refer to external agencies for further advice and support in determining how to provide the best outcomes for such students.

10.3 Student at Risk of Immediate Harm

The Children's Act (1989), Section 47, 1(b) defines a child at risk as being one who is suffering, or likely to suffer, significant harm. Types of harm might include (but are not limited to) sexual abuse; domestic abuse in intimate relationships; criminal exploitation; or serious violence, including that linked to county lines or radicalisation.

If a staff member believes that a student is in immediate danger or at risk of immediate harm, they must inform the DSL or one of the DDSLs immediately or make an immediate referral to NYC Emergency Duty Team and/or the Police ([see contact details here](#)). **Anyone can make a referral.** Any such referral must be made immediately by telephone. A written referral must be completed and submitted within 24 hours of the telephone contact.

Parental consent is not needed for referrals to statutory agencies such as the police and, where there is an emergency, to Local Authority Children's Social Care. Nevertheless, we will always work closely with parents in such situations if it is appropriate to do so. **If anyone other than the DSL makes a referral, they must inform the DSL as soon as possible that a referral has been made and record this on the College's safeguarding platform (CPOMS).** They must challenge any inaction (on anyone's part) and follow this up with the DSL /DDSLs and Local Authority Children's Social Care as appropriate (see KCSIE, paras. 64-67). All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and logged on the College's safeguarding platform (CPOMS).

We work closely with North Yorkshire Safeguarding Children Partnership (NYSCP) and in line with its policies, procedures and practice guidance.

10.4 Student at Risk of Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Protecting students from this risk is fundamental to the College's safeguarding approach.

- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - negate or destroy the fundamental rights and freedoms of others; or
 - undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - intentionally create a permissive environment for others to achieve the results intended in the preceding bullet points
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups;
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a student is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a student's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff must be alert to changes in students' behaviour, which could indicate that they may be in need of help or protection. Staff must use their judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the DSL or a DDSL making a Prevent referral.

The College's DSL (who is the College's Prevent Officer) and DDSLs are aware of local procedures for making a Prevent referral.

If you are concerned that a student may be exposed to radicalisation, you must log this on the College's safeguarding platform (CPOMS) or using the Safeguarding Concern Reporting Form, after which the DSL or a DDSL will follow the safeguarding procedures outlined in this policy and may also make a referral to the Channel programme.

For further advice about extremism the DfE provide a dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: they can be contacted on 020 7340 7264 or counterextremism@education.gsi.gov.uk or contact 101 (non-emergency number for the police).

Local information and guidance for Prevent and the Channel process is available via North Yorkshire Partnership [here](#) and on the NYSCP website [here](#).

The College assesses site security and has emergency and simple response plans in line with the DfE non-statutory guidance Protective security and preparedness for education settings. The College is working towards Martyn's Law becoming statutory in Spring 2027. Martyn's Law factsheet

10.5 Serious Violence and Weapons-Related Concerns

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL. Early support, escalation and intervention are essential when there are risks of serious violence. KCSIE cites additional risk factors for students who have faced: suspension, time in Alternative Provision, permanent exclusion, use of drugs/alcohol in early adolescence and victim or perpetrator of violence.

Resources can be found below:

- Serious Violence Strategy, HMG
- <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

10.6 Student Missing from Education

As Working Together to Improve School Attendance (2026) para. 23 states, 'children missing education can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation.'

Where a student presents with unexplainable or persistent absences, the College will discuss attendance with the parent, and if there is no improvement, local procedures will be followed for the notification of the Local Authority.

Attendance is registered in accordance with Department for Education requirements and staff are aware of how to deal with situations where students go missing either from school or on a school trip.

Details of these procedures are outlined in the Attendance and Supervision Policy.pdf.

Following KCSIE para. 221, the College recognises that it must make the Local Authority aware if a student leaves the roll at a non-standard transition point.

10.7 Elective Home Education (EHE)

The College must inform the Local Authority of all deletions from its Admissions Register when a student is taken off its roll, except when a student has completed the final year.

The College will work with other key professionals where a parent has expressed an intention to remove a student with a view to their education being continued at home.

EHE guidance can be found at: Elective Home Education, responsibilities and guidance.

Any consideration of flexi-schooling or a part-time timetable should have due regard to the safeguarding implications. Schools should follow the North Yorkshire protocols for part-time timetables and flexi-schooling guidance.

10.8 Alternative Provision and children at risk of exclusion

In line with KCSIE 208-213, in the event of a student in the College being educated in an Alternative Provision setting, the responsibility for the safeguarding of the student will remain with the College. The College will assure this provision and ensure the safeguarding arrangements are in place for any pupil they place there, including attendance monitoring and follow up of any absence, and retain the duty of care as well as ensuring that the provision meet the pupil's needs.

- Alternative Provision
- Alternative Provision guidance (NYC, 2023)

The College recognises that the cohort of pupils in Alternative Provision often have complex needs, and it is aware of the additional risk of harm that our pupils may be vulnerable to. When considering use of exclusion or suspension, the College is aware of the potential negative impact and considers preventative measures to exclusion outlined in School Suspensions and Permanent Exclusions (DfE, 2026)

Part-time timetables are only used in exceptional circumstances once all other support/interventions have been attempted to enable a pupil to attend on a full-time basis. They are not used for behavioural problems or sanctions.

Any flexi-schooling requests will be considered by the Headmaster who will consider the benefits and risks of the agreement, not only to the child's education, but also the child's welfare and wellbeing.

11. Child Exploitation - Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), including County Lines and Modern Slavery

11.1 Child Criminal Exploitation (CCE)

This 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 either in exchange for something the victim needs or wants, and/or for the financial or other advantage for the perpetrator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. The victim may have been criminally exploited even if the activity appears consensual. CCE does not have to include physical contact, it can also occur through the use of technology. The most prolific form of CCE is where children are exploited and coerced to carry drugs or other contraband from urban areas to suburban and rural areas ('county lines').

Indicators that may signal a student is at risk from or involved with CCE can include:

- increased absences,
- a change in friendships or relationships with older individuals,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing.

Unexplained gifts or new possessions could also indicate that students have been approached by or are involved with individuals associated with criminal networks or gangs. If you are concerned about a student, you must report this on the College's safeguarding platform (CPOMS), or on the safeguarding concern reporting form. Additional advice can be found in Preventing Youth Violence and Gang Involvement, Criminal Exploitation of Children and Vulnerable Adults: County Lines and from NYSCP.

11.2 Child Sexual Exploitation (CSE)

This involves young people who are sexually abused or coerced into sexual activity in the context of exploitative relationships by a person/person of any age, including another young person. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not have to include physical contact, it can also occur through the use of technology. CSE can affect any child or young person under the age of 18, 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 young person's immediate knowledge (e.g. through others copying images they have created and posted on social media). Indicators of CCE (above) can also be indicators of CSE as can students who have older partners and students who suffer from sexually transmitted infections or become pregnant.

CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

KCSIE defines county lines as gangs/networks moving drugs/money via dedicated 'deal lines'. The child cannot consent to exploitation/modern slavery (always to be treated as victim). The DSL can refer to National Referral Mechanism (NRM) - may also have access to Independent Child Trafficking Guardian (ICTG)

Additional guidance for managing child exploitation can be found below:

- <https://safeguardingchildren.co.uk/beaware/>
- CCE and County Lines, North Yorkshire
- Modern Slavery and Human Trafficking, North Yorkshire
- <https://safeguardingchildren.co.uk/mace/> and MACE@northyorks.gov.uk.
- The Children's Society

12 Domestic Abuse and Teenage Relationship Abuse

Following the Domestic Abuse Act (2021), The College recognises that children can be significantly harmed by domestic abuse, whether as direct victims (for example through intimate relationship abuse), or through witnessing or otherwise experiencing abusive behaviour, whether psychological, physical, sexual or emotional.

The College recognises the duty to respond to domestic abuse as a serious safeguarding concern. It participates in Operation Encompass with North Yorkshire Police, and the DSL is the 'Key Adult.' KCSIE states there is now a statutory duty on Police to inform schools and to comply with data protection laws.

Domestic abuse may take many forms. Child and Adolescent to Parent Violence and Abuse will be treated as a safeguarding concern, as it may be indicative of other co-existing harmful behaviours within the home.

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

13 Child-on-Child Abuse (including harassment and violence)

All staff must be aware of the possibility that children may abuse other children (often referred to as child-on-child abuse). All staff must be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. This can include (but is not limited to):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- KCSIE 2026 para 37 states that discriminatory behaviour, including racism and faith-targeted abuse, added to the definition of child-on-child abuse.
- abuse within intimate partner relationships;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. (This may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault. (This may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which 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;
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos
- and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Ampleforth takes a 'whole-college' approach to child-on-child abuse, and understands that it can only be countered effectively through all staff working together, and also with students, parents and other stakeholders. KCSIE 2026 para. 119 states highlights the new expectation that schools promote an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities.

Ensuring that, as well as knowing how to respond to concerns, all staff know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of

risk early, the College ensures that staff know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

The College trains staff to recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

Having a zero-tolerance approach to Harmful Sexual Behaviour (HSB) and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children and is in line with Part 5 of KCSIE 2026. HSB is on continuum from normal/developmentally expected to inappropriate/problematic/abusive which could lead to sexual violence.

All staff should be clear that child-on-child abuse should always be viewed as a serious safeguarding concern, and should be reported immediately via CPOMS or directly to the DSL or DDSL. Furthermore, all staff should understand that even if there are no reports of child-on-child abuse it does not mean it is not happening; it may be the case it is just not being reported.

Child-on-child abuse may take place online or other forms of technology may be used to facilitate offline abuse. Students are regularly reminded of the College’s policy on bullying and on cyberbullying and all students must sign an Acceptable Use Agreement which governs their behaviour on the College network.

Child-on-child abuse can manifest itself in many ways both between students at the College, and between students at the College and those of other schools. Some forms of child-on-child abuse are:

- Bullying amounting to child-on-child abuse: Bullying which creates safeguarding concern is any behaviour that is repeated over time and intentionally hurts another student or group of students physically or emotionally. It can occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email) and always involves an imbalance of power. It can cause long lasting psychological effects. Bullying which amounts to child-on-child abuse is bullying of a serious or sexual nature between persons of a similar age which results in or has the potential to cause significant harm.
- Physical abuse: this includes hitting, kicking, shaking, biting, slapping, or otherwise causing physical harm to another young person.
- Harmful Sexual Behaviour: refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes but is not exclusive to abusive or violent behaviours); also abuse in intimate personal relationships (also known as teenage relationship abuse).
- Serious Youth Crime (including sexual assault): includes crimes of the most serious nature including murder, rape and GBH perpetrated on or between young people under 18.
- Making or Sharing nudes and semi-nudes (formerly ‘Sexting’ or ‘Youth Produced Sexual Imagery’): the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. KCSIE para. 530 states that ‘all incidents of sharing of nudes, whether consensual or non-consensual, should be treated as a safeguarding concern’. Pressuring someone into sending a nude or sexually explicit picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference, but extra vigilance is required in a residential setting. Once the image is taken

and sent, the sender has lost control of the image and these images could end up anywhere or be stored indefinitely. Possessing or distributing indecent images of a person under 18 is a crime under the Sexual Offences Act 2003. The UK Council for Internet Safety have produced advice for education settings working with children and young people on Sharing Nudes and Semi Nudes. Please also see below regarding the handling of any indecent images.

Remember: staff must not view or forward the image.

- ‘Images’ now means images, videos and livestreams and may be self-generated by child, taken/created by someone else, digitally altered or wholly generated by AI (including ‘deepfakes’ and ‘deep nudes’).
- Sexual harassment: refers to ‘unwanted conduct of a sexual nature’ that can occur both online and offline. Sexual harassment is likely to violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment by other students can include:
 - Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and calling someone sexualised names.
 - Sexual “jokes” or taunting.
 - Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes or displaying pictures, photos or drawings of a sexual nature.
 - Upskirting. This 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.
 - Online sexual harassment. This may be 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 and online sexual exploitation, coercion and threats.

Sexual violence and sexual harassment can occur between children of any age and sex, and between individuals and groups. However, it is more likely that girls will be the victims, and boys the perpetrators, of these behaviours. Sexual violence and sexual harassment exist on a continuum and may overlap. These behaviours can occur online, face-to-face, or in a combination, and can be associated with factors outside the College, including intimate personal relationships. In all likelihood, a victim’s educational attainment will be affected by these behaviours.

The College recognises that interventions to address inappropriate behaviour can help prevent more serious behaviour in the future. It also recognises that not acknowledging or understanding the scale of scale or harassment and abuse, or downplaying its significance, can lead to a culture where students accept these behaviours as normal, and therefore do not make reports.

All staff are familiar with guidance on child-on-child abuse from KCSIE 2026 Part 1, (paras. 192-193) as well as the statutory guidance in relation to child-on-child sexual violence and sexual harassment contained within KCSIE 2026 Part five.

Extra guidance can be found at:

- <https://safeguardingchildren.co.uk/beaware-professionals/hsb/>
- <https://learning.nspcc.org.uk/child-health-development/sexual-behaviour>

- <https://learning.nspcc.org.uk/media/2685/responding-to-children-who-display-sexualised-behaviour-guide.pdf>

13.1 Minimising the Risk of Child-on-Child Abuse

The College recognises its duty to minimise the risk of Child-on-Child Abuse. This duty is met in a variety of ways including:

- The College's Christian Living Programme, which includes Personal, Relationships, Health and Sex Education (PSHE); and also briefings to year groups around specific issues such as consent, HSB and online safety.
- The College's Harmful Sexual Behaviour Action Plan. The purpose of this plan is to reduce the risks of harmful sexual behaviour by student questionnaires, additional staff training, and guidance to parents.
- Communication with parents regarding the safe management of parties.

13.2 Reporting concerns of child-on-child abuse

- All students are made aware of how to report any safeguarding concern, including child-on-child abuse. The photographs, names and contact details of the DDSL team are displayed across the College campus, including in Houses and common areas.
- The College recognises that students may not find it easy to disclose their experience of abuse verbally. Staff need to be aware that students may show signs or act in ways that they hope adults will notice. Rather than making a disclosure themselves, a victim's friend may make a report, or a conversation may be overheard suggesting that something is wrong. Staff need to be alert to any signs that a student has been harmed. Also, a change in a child's behaviour may be a non-verbal disclosure that they have suffered harm. These behavioural changes may manifest in a wide variety of ways and staff should be vigilant to these changes.
- Fear of backlash from other students can be a powerful factor in deterring or delaying disclosures of child-on-child abuse and the College recognises the imperative of reassuring and supporting any victim making a disclosure.

13.3 How allegations of child-on-child abuse will be recorded, investigated/managed

- The College recognises that all allegations of child-on-child abuse are to be taken very seriously, and these will be treated as high-level safeguarding concerns. Students who have been victims of HSB or other forms of child-on-child abuse may find the experience stressful and distressing.
- All allegations of child-on-child abuse will be logged as soon as possible on the College's safeguarding platform ([see flowchart](#)), where any actions, decisions and outcomes will be updated as these occur.
- Allegations will be investigated in line with the guidance stipulated in KCSIE Part 1 and Part 5.

13.4 How victims, perpetrators and any other affected children will be supported

- The College recognises that its initial response to a report from a student is incredibly important, and the importance of all victims being reassured that they are being taken seriously.

- The College recognises that its principal duty is to protect, support and reassure the victim in any allegation of child-on-child abuse.
- The College will also assess the risks and needs of the victim, the perpetrator and other students. This should also include a careful consideration of whether the victim and perpetrator/s should be separated when in classes and activities, depending on the nature of the allegation.
- The College will fulfil its duties to make referrals, as needed, to Local Authority Children's Social Care and to the Police, as stipulated in KCSIE.
- The College will also signpost the victim to appropriate services, such as Child and Adolescent Mental Health Services (CAMHS).
- The College will follow the guidance of external agencies, including that of any Child Sexual Violence Advisor (ChiSVA) appointed to support the victim.
- The College will also consider the educational needs of the alleged perpetrator/s and what safeguarding support they may need, recognising that they may have unmet needs of their own, and that they themselves may have experienced abuse.

13.5 Issues to consider when responding to allegations of child-on-child abuse

In the case of abuse by a student, or group of students, the key issues that must be considered when determining that abuse is taking place are:

- The frequency, nature and severity of the incidents
- Whether the victim was coerced by physical force, fear, or by a student or group of students significantly older than them or having power or authority over them
- Whether the incident involved a potentially criminal act, and whether if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable. (If in doubt, report on the College's safeguarding platform.)
- The impact of the incident on the student or students involved

When a disclosure is made it is essential that the victim or victims are reassured that they are being taken seriously and that they will be supported and kept safe. All staff should act in the best interests of the child.

Where an allegation of abuse against one or more students has been made or where staff are concerned about child-on-child abuse, the child protection procedures set out in this policy and summarised in the flowcharts [here](#) must be followed; specifically, staff must report their concern immediately on the College's safeguarding platform (CPOMS) or using the Safeguarding Concern Reporting Form. The student(s) accused of abuse, and the victim of abuse, will both be treated as at risk and a referral will be made to Local Authority Children's Social Care in respect of either student if that student is suffering or is at risk of harm.

Where there has been a report of sexual violence the DSL or DDSL should make an immediate risk and needs assessment. This should consider the protection and support for the victim; the alleged perpetrator; all the other children, and any actions that are appropriate to protect them.

If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, we will ensure that parents are informed as soon as possible, and that the student is supported during the interview by an appropriate adult. A wide variety of staff have received appropriate

adult training. In the case of students whose parents are abroad, the student's guardian will be requested to provide support to the student.

In some cases of sexual harassment, for example, one-off incidents, the College may take the view that the students concerned are not in need of Early Help/Family Help or statutory intervention and that it would be appropriate to handle the incident internally, where relevant utilizing the College's behaviour policy and by providing pastoral support.

In instances where there has been non-violent harmful sexual behaviour the College may decide that the students involved do not require statutory interventions, but may benefit from Early Help/Family Help, which can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Where a pupil has been harmed, is at risk of harm, or is in immediate danger, the College should make a referral to Local Authority Children's Social Care.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that the College must pass this on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. Any report to the police will generally be in parallel with a referral to Local Authority Children's Social Care.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL /DDSLs should consider whether the student or other person making the allegation is in need of help or may have been abused by someone else, and that this is a cry for help. In such circumstances, a referral to Local Authority Children's Social Care may be needed.

If a report is shown to be deliberately invented or malicious, the College should consider whether any disciplinary action is appropriate against the individual, following its policies.

14 Online Safety

Many of the concerns described above (for example sexual abuse, severe bullying and extremism and radicalisation) may occur online.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place online as well as face to face.

In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abuse, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

The College recognises its duty to safeguard children from potentially harmful and inappropriate online material.

Following KCSIE, para. 165, The College recognises that there are four principal areas of risk:

- **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, as well as extreme sexual and physical violence.
- **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. This includes harmful interactions with other users or with generative AI applications simulating adults posing as children.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated by AI, (e.g. consensual and non-consensual 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.

Following KCSIE para. 169, The College has an Online Safety Policy, and the DSL has overall responsibility for the safeguarding aspects of the College's network and WIFI, liaising with the IT Network Manager.

KCSIE paras. 167-168 on Artificial Intelligence (AI) and Emerging Technology Risks show increased focus on safeguarding risks from AI-generated content, including intimate 'images', deepfakes, harmful interactions, technology-facilitated abuse and exploitation. Further details can be found here: <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education>

The College uses several methods of monitoring including:

- Physical observation of screens, for example during lessons.
- In computer rooms teachers may remotely monitor the screens of other logged in users
- The use of a Firewall and live monitoring and filtering software of all devices connected to the College's WIFI and network.

Following KCSIE paras. 173-177, and Meeting Digital Technology Standards in Schools and Colleges (DfE, 2023), The College ensures that individual user access to the College network is appropriately filtered and monitored, using Sophos Fastvue or Opendium that blocks access to harmful sites and content, and which generates automatic reports whenever this may have occurred or been attempted.

The filtering system is operational at all times, is automatically updated, and monitors all users (including guest accounts), school owned devices and any other devices using the College's network and WIFI. In addition, the College may also add specific websites or search terms to be blocked, should the need arise.

The College's Firewall, Opendium and Sophos software blocks access to, and generates reports, if there is an attempt to access websites that:

- have known sexual content, including where that content is known to be, or might be, unlawful

- promote extremism or violence
- promote or encourage suicide or harmful behaviours
- promote gambling
- promote illegal substances

Search terms entered into web browsers in the above categories will also result in the searches being blocked and reported.

This system filters all internet feeds, including any backup connections and is sensitive to texts in multiple languages. The College also has software in place to identify the use of VPNs and other proxies.

The College has defined responsibilities for the operation of monitoring and filtering.

- The Description of Responsibilities for the Safeguarding Governor includes holding the DSL to account for filtering and monitoring.
- The DSL has overall responsibility for online safety, and is accountable to The Headmaster and The Safeguarding Governor (representing the Governing Board) for ensuring that standards are met including documenting decisions, reviewing effectiveness and overseeing reports. The DSL also maintains a log of reports from the Firewall, and enters the incident on CPOMs.
- The DSL is responsible for training staff to ensure that they are aware of the operation of monitoring and filtering, school devices and school networks including the use of AI.
- The IT network manager ensures the technical operation of the monitoring and filtering software, and the Firewall. The IT Manager and the DSL liaise regularly regarding monitoring and filtering. For example, the DSL receives a weekly report from the IT Manager.
- Pastoral Staff, and where appropriate those with disciplinary responsibilities, may also be involved in follow-up conversations with individual students.
- Where the report relates to the behaviour of a staff member or volunteer, The Headmaster and HR Manager will be involved.
- The DSL educates pupils and staff in their use of technology in line with the taught safeguarding curriculum and ensuring that staff understand the four areas of risk for online safety outlined in para. 165 of KCSIE 2026, including use of Generative AI.

The Sophos system, including the Fastvue reporting mechanism, and Opendium system are maintained by the IT Network Manager. Alerts produced by Sophos Fastvue or Opendium are sent directly to the DSL and DDSLs. The DSL/DDSLs follow-up alerts where there is a cause for concern (i.e. where there is good reason to believe that the alert is not a 'false-positive', such as that produced by unsolicited advertising sent to the user, and where there is no concern around the appropriateness, safety or legality of the content). Where the concern relates to a student and does require further investigation, this is logged on CPOMS for follow-up by the relevant staff member. Where the alert relates to a staff member or volunteer, and where further investigation is deemed necessary, the College follows its procedures for Low Level Concerns.

The College will carry out an annual review by the SLT member who is responsible for filtering and monitoring (Rowland Hills, Bursar and COO), with the support of the school's DSL (Matt Glendon-Doyle) and IT support, of our approach to online safety, including the use of AI and

filtering and monitoring. This includes checks that the filter is working appropriately on all Internet connected devices in all locations and records held. The College will also keep up to date with evolving cyber-crime technologies.

Following KCSIE, para. 174, The College has Risk Assessments in place for Online Safety and The Prevent Duty, and these include consideration of network monitoring and filtering.

The College addresses the age appropriateness of internet access through differentiated arrangements for when year groups can access technology such as mobile devices.

Staff are trained to report any concerns around online behaviour, or any Firewall-related issues, including any apparent failure of the monitoring and filtering system, or any websites where access may be reasonably unblocked for the purpose of teaching and learning or other legitimate reasons.

Students and staff are guided in the acceptable use of our network and the internet in general (all advice is in line with the Department of Education guidance document, Teaching Online Safety in Schools (DfE, 2023)).

Students also receive training in online safety appropriate to the needs of their year group. The College communicates with parents on matters of online safety, and this includes sharing information regarding steps taken within the College to prevent access to harmful content.

The College recognises that students with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber dependent crime. If there are concerns in this area, the DSL should consider referring the individual to the National Crime Agency Cyber Choices programme.

KCSIE states that 'All schools should be mobile phone-free environments by default' from 1st September 2026. This includes during lessons, breaktimes and lunchtime. The College also has a Mobile Phone Policy that states under what circumstances pupils in particular year groups may use their mobile phones, including permitted times and locations.

Cybercrime is now described as one of the most significant and rapidly evolving threats in the UK. Children may drift into cyber-dependent crime without understanding legalities. The DSL can consider referral to the Cyber Choices programme.

Any evidence that a student may be at risk online or indeed being harmed online must be recorded immediately on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form so that it can be taken forward as a child protection issue.

In cases of students sexting (sharing nudes or semi-nudes) or sharing pornographic images online, staff are reminded that it is illegal to possess, store or distribute an image containing sexual imagery of a child under 18, even if the possessor is under 18 and/or the image shared is of themselves. Therefore, when taking a disclosure from a student concerning this issue, **do not view or forward the image**. Instead alert the DSL or DDSL to the image's existence through an entry on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form.

When responding to instances of nudes or semi-nudes, the College will be guided by [Sharing nudes and semi-nudes \(DfE, 2024\)](#)

The College also recognises that online safety is a theme that is related to other areas. It is referenced throughout the following policies: [Online Safety Policy.pdf](#) [Acceptable Use Policy - Students.pdf](#) [Anti-bullying Policy.pdf](#)

Other guidance can be found below:

- <https://www.iwf.org.uk/resources/ai-generated-child-sexual-abuse-material-professionals-resource/>
- <https://www.ceopeducation.co.uk/professionals/guidance/ai-guidance-for-professionals/>

15 Safeguarding SEND Students

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges, both in person and online. Consequently, there is regular and structured collaboration between the DSL, the DDSLs and the Learning Support Department. Students with higher level SEND needs receive additional pastoral support from the Learning Support Department.

Evidence shows that children with SEND are among those more at risk of abuse, neglect and exploitation. Additional barriers (See KCSIE paras. 249-251) can exist when recognising abuse or neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with special educational needs and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers may make it difficult, for example, for the child to disclose about a concern.
- cognitive understanding – the ability to tell the difference between fact and fiction in online content.
- Children with special education needs and disabilities might not recognise abuse, need more intimate care and be more dependent on adults if they are isolated.

The College recognises the need to support SEND students in expressing any concerns they may have and be particularly vigilant to any signs or indicators of abuse. Additional advice may be sought from the SENCO and the DSL/DDSLs as appropriate. In cases where abuse is reported or suspected involving a student with SEND needs, close liaison will be necessary between the SENCO and the DSL/DDSLs.

The College trains staff to understand the additional barriers and puts in place additional and different measures to support these children to recognise and communicate abuse, neglect or exploitation.

Further information regarding the protection of deaf children and those with disabilities may be found in the NSPCC guidelines: [Safeguarding d/Deaf and disabled children and young people](#).

16 Safeguarding children with medical needs

The College supports pupils at school with medical conditions and allergies and are properly supported so that they have full access to education, including school trips and physical education. The College maintains recording, reporting and tracking information / training yearly, and consults with healthcare professionals, pupils and parents ensuring that the needs of children with medical conditions and allergies are properly understood and effectively supported.

The College recognises that although serious incidents of harm and even child deaths have occurred in school and college settings, a child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk.

In the event of a clinical incident taking place, the responsible healthcare professional, will work in conjunction with our DSL to consider whether any safeguarding duties has been triggered and whether any further action is required based on the nature of the incident.

The school follows the DfE guidance Allergy safety in schools and Supporting pupils with medical conditions at school.

A referral to social care is not necessary for medical conditions unless there is an indicator of abuse/neglect (e.g. persistently sent to school without medication).

17 Safeguarding and the needs of LGBT Students

The College recognises that students who define themselves as LGBT, or are perceived to be by others, may face additional challenges and vulnerabilities, including the potential for harassment or exclusion by peers; and also that the risks for LGBT students may be greater if they do not have a trusted adult in whom to confide. Whilst the fact that a child or a young person who may be LGBT is not in itself a risk factor for harm, we recognise that children who are LGBT, or perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are and may not have a trusted adult with whom they can be open.

18 Gender Questioning Children

Following KCSIE paras. 254-284, The College takes a very careful approach to social transition and where students are questioning their gender, and, unless this would present a significant risk of harm to the individual, will work with parents to seek to understand the child's needs holistically including, where relevant, those relating to mental health, relationships with family and peers, autism and/or Attention Deficit Hyperactivity Disorder. The College does not initiate any action but when the child or parent/carer has raised the request. When making decisions, the College adheres to safeguarding legislation and equality and human rights law ensuring the best interests of the child and other children. The decision-making process is documented and records are kept. The College works with parent/carer and considers any clinical or non-clinical advice where relevant (for example from Learning Support).

The College has strict, biological sex-based segregation for single sex spaces (toilets, changing rooms, boarding, other residential) prohibiting pupils from using opposite-sex facilities. Supporting any degree of social transition will not allow access to spaces designated for the opposite sex, including not allowing children to join sports designated for the opposite sex where there are safety reasons for single sex sports. If a child does not wish to use a space for the biological sex, the College will provide separate, secure and self-contained options whilst prioritising safety, comfort, privacy and dignity.

When determining how to proceed The College will refer to Guidance for Schools and Colleges in relation to Gender Questioning Children (DfE, 2023).

19 Restrictive interventions, including use of reasonable force

There are limited circumstances when it is appropriate for staff in schools to use ‘reasonable force’ to safeguard children. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is necessary for the least amount of time’, the application of which will depend on the circumstances.

The school does not have a ‘no contact’ policy as this can leave staff unable to fully support and protect their pupils and students. The school adopts policies, which allow and support the staff to make appropriate physical contact. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances including consideration of whether the child has Special Educational Needs or Disabilities (SEND), mental health or with a medical condition. These decisions will also align with our duties under the Equality Act 2010 and the Public Sector Equality Duty and align with the statutory guidance Restrictive interventions including the use of reasonable force in schools guidance

[Link to school policy: Physical Contact and Physical Intervention Policy](#)

20 Boarding and Residential Accommodation

The College is alert to the extra vulnerabilities of children with SEND and proactive in reporting inappropriate relationships or where behaviours are a cause for concern. The College is aware additional potential for child-on-child abuse and complies with statutory guidance, by not allowing a child to share overnight accommodation with a child of the opposite biological sex. The College is proactive in sharing information with statutory partners and compliant with the additional safeguarding requirements relating to National Minimum Standards and regulations for all schools and colleges with residential provision for children.

21 Safeguarding and Mental Health

Staff must be aware that mental health problems can, in some cases, develop into safeguarding concerns and be an indicator that a student has suffered or is at risk of suffering self-harm, abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health issue. However, staff are well placed to observe students day-to-day and identify those whose behaviour suggests they may be experiencing a mental

health problem or be at risk of developing one. A whole school approach is needed – early intervention and escalation are essential, as are liaising with/referral to specialist services where needed.

Possible signals of a mental health concern are: self-harm, eating disorder, suicidal ideation or risk of suicide. KCSIE para. 48 points to other potential warning signs: changes in behaviour, sleep issues, social withdrawal, not wanting to do things they like, signs of physical signs of harm and neglect.

If staff have a mental health concern about a student, they must log this on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form immediately. If there are indications that the student may be suffering, or at risk of suffering serious harm, staff must contact the DSL or one of the DDSLs immediately or if contact cannot be made with any of these, NYC Emergency Duty Team and /or the Police (contact numbers [here](#)). If a mental health concern is also a safeguarding concern, the DSL or one of the DDSLs should be notified.

The DfE has published advice and guidance on [Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools](#). In addition to which, Public Health England has produced a range of resources to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#).

The College has access to a range of advice to help in identifying students who may be in need of additional mental health support. The Designated Mental Health Lead is the DSL and has received full training.

The college adheres to the following DfE guidance:

- [Promoting children and young people's mental health and wellbeing](#).

Other helpful resources are:

- <https://safeguardingchildren.co.uk/shsip/>
- <https://thegoto.org.uk/>.

22 Students who are, or who have been, Looked After Children and children with a social worker, care leavers and children in kinship care

Students who are looked after by a local authority, or who were previously looked after, can face additional safeguarding issues and are potentially vulnerable.

If staff have any concerns about this category of students, they must report them on the College's safeguarding platform (CPOMS) or using the Safeguarding Concern Reporting Form. The DSL/DDSL will then contact the Deputy Head Academic, Helen Pepper, who is the College's designated member of staff for looked after children.

He has overall responsibility for their welfare and progress. In addition to this, he will have up to date assessment information from the relevant local authority for students, their most recent student welfare risk assessment and contact arrangements for parents and carers. The College is committed to sharing information with specialist partners.

Further information on the responsibilities of the Designated Teacher is available via: [The Designated Teacher for looked after and previously looked-after children: Statutory guidance on their roles and responsibilities \(DfE, 2018\)](#).

Support and guidance are available to children who have been care leavers from the [North Yorkshire Virtual School](#).

Kinship care is any situation in which a child is being raised in the care of a friend or family member who is not their parent. The arrangement may be temporary or longer term. 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.

A private fostering arrangement is someone who is not a close relative of the child, who looks after the child for 28 days or more. If the College is notified, it will notify the local authority to check that the arrangement is suitable and safe for the child. Further information can be found here: <https://safeguardingchildren.co.uk/professionals/procedures-practice-guidance-and-one-minute-guides/private-fostering/>

23 Students Reporting Honour Based Abuse (HBA)

Honour based abuse is a general term which includes incidents or crimes which have been committed to protect or defend the 'honour' of the family and/or the community, including female genital mutilation (FGM), forced marriage (and any behaviour intended to coerce an individual aged 18 to marry), and practices such as breast ironing. If any evidence of such practices within a family comes to light staff must report this on via CPOMS or the safeguarding concern reporting form immediately.

If an adult learns that an act of FGM appears to have been carried out on a girl aged under 18, they have a statutory duty to report it to the police. They must also follow the usual safeguarding procedures set out in this policy and report the matter on the College's safeguarding platform (CPOMS) or the safeguarding concern reporting form. The DSL/DDSLs will involve Children's Services where appropriate. There are a range of potential indications that a girl may be at risk or has already suffered from FGM. Further information is available within KCSIE para. 46.

Further guidance can be found at:

- <https://northyorkshirescp.trixonline.co.uk/chapter/honour-based-abuse>
- <https://safeguardingchildren.co.uk/professionals/procedures-practice-guidance-and-one-minute-guides/female-genital-mutilation-fgm/>
- <https://safeguardingchildren.co.uk/professionals/procedures-practice-guidance-and-one-minute-guides/forced-marriage/>

24 Allegations about Members of Staff, including volunteers, contractors, trainee teachers and supply teachers

All staff understand the definition of appropriate behaviour and professional boundaries. The College has a process in place for internal reporting, and external reporting to the LADO ([see contact details here](#)), of any concerns about a member of staff (or any adult working with children).

Any concerns or allegations about the conduct of a member of staff that may meet the harms threshold detailed below will first be referred to the Headmaster (or the Deputy Head in their absence). Flowchart for reporting can be found here.

In all cases regarding concerns about a member of staff (or adult working with children) the College will work within the framework provided by NYSCP's document Managing Allegations against Those Who Work or Volunteer With Children Procedure.

Where the College has identified that a child has been harmed, the DSL (or DDSL) will assess whether the child is at risk and will make a report to Local Authority Children's Social Care, in addition to the actions taken by the case manager regarding the staff member.

The person to whom an allegation or concern is first reported, should treat the matter seriously and keep an open mind. They should not: investigate or ask leading questions; make assumptions or offer alternative explanations; promise confidentiality. Any written record should include factual information e.g. own words, time, date, place and who present. The Headmaster will identify whether it meets the harm / risk of harm threshold and is therefore an allegation.

Allegations involving an immediate risk to a child or a safeguarding concern that requires an urgent response, should be reported immediately to the police by calling 999 (emergency) or 101 (non-emergency).

Full guidance can be found in KCSIE Part 4 and local guidance Managing Allegations Against Those Who Work or Volunteer with Children – LADO Process.

24.1 Concerns that may meet the harm threshold

Following KCSIE para. 437, guidance must be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

As noted above, where staff have concerns about another staff member posing a risk of harm to children, this should be reported to the Headmaster (or Deputy Head in their absence). If the concern is about supply staff or a contractor, the employer should also be notified, in addition to a report being made to the Headmaster.

The process for responding to allegations/concerns that do not meet the harms threshold is detailed immediately below.

24.2 Low-level concerns

A Low-level concern is defined as one that does not meet the threshold set out above but where there are nonetheless concerns that an adult working for the College may have acted in a way that is inconsistent with the code of conduct, including inappropriate conduct outside of work.

KCSIE paras. 507-512 state that examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door: or,
- humiliating pupils.

24.3 Reporting low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Headmaster (or to the Deputy Head in their absence). If the concern is about the Headmaster, a report should be made to the Chair of Governors.

A staff member may share a low-level concern confidentially using the procedure noted below.

[Flowchart for reporting can be found here](#)

Where the low-level concern relates to a person employed by a supply agency or contractor to work in the college, the employer should also be notified about the concern, so that any potential inappropriate patterns of behaviour can be identified.

24.4 Responding to reports of low-level concerns

If the College has been alerted to a low-level concern and is in doubt as to whether it meets the harm threshold, it should consult with the LADO.

The College should ensure that staff feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. (See below: **Self-reporting of low-level concerns**.)

24.5 Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include the 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 that should be respected as reasonably possible.

24.6 Reviewing the records of low-level concerns

Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Should a pattern of such behaviour be identified, the College would 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 should be referred to the LADO. The log of Low-Level Concerns is checked regularly by the Safeguarding governor throughout the year.

24.7 Self-reporting of low-level concerns

The College recognises that having a system for staff to self-report is part of a healthy safeguarding culture. Self-reporting provides an opportunity to staff to share concerns where they may be anxious around a situation, for example where their actions or words may have been vulnerable to misinterpretation, where they may have had to take extraordinary action, or where a circumstance has arisen beyond their control. Self-reporting also permits lessons to be learned and the refining of best practice.

The following examples are circumstances where staff may wish to consider making a self-report of a low-level concern, but this list is not exclusive:

- Where the behaviour of a student has caused a staff member to feel uncomfortable.
- Where the appropriate, necessary and proportionate use of restraint was required, especially in a situation where there were no other witnesses present.
- Where a staff member had to administer emergency first aid in a secluded or remote location, and where there may have been no other witnesses present.
- Where an emergency required the unscheduled driving of a lone student, for example to access medical care.
- Where a staff member needed to perform a safety check on a student in an enclosed space.
- Where a use of language or gesture by a staff member may have been misinterpreted by students.
- Where a student has attempted to contact a staff member using a private channel, such as via social media.

If a staff member wishes to self-report they should contact the DSL, or in their absence one of the DDSs.

25 Whistleblowing

All staff should always feel able to raise concerns about poor or unsafe practices and potential failures in the College's safeguarding regime. If staff have concerns that a child protection matter is not being dealt with in accordance with our stated procedures, they must raise it under the school's Whistleblowing Policy, which can be found at [Whistleblowing Policy.pdf](#).

Alternatively, if it is felt that genuine concerns are not being addressed, staff may contact the NSPCC whistleblowing advice line (0800 028 0285 or help@nspcc.org.uk) or contact the Local Authority Designated Officer (LADO) when appropriate to do so in accordance with KCSIE. [NSPCC Whistleblowing Advice Line](#) and [NY Whistleblowing Practice Guidance](#)

There will be no retribution or disciplinary action taken against staff for making such a report if it is done in good faith. Malicious allegations, however, may be considered as a disciplinary offence.

26 Management of Safeguarding

The College follows rigorous procedures to ensure that the welfare of students is paramount. These include the following:

26.1 The Safeguarding Review process (For further details, see Appendix C).

During term-time the DSL/DDSLs lead a weekly Safeguarding Review meeting, for each House, with the HSMs, and the SENCO, or their deputy, to discuss students who are the subject of safeguarding or other significant pastoral concerns; to review actions already taken; and to identify next steps. If the SENCO or their deputy cannot be present at the Safeguarding Review meeting, they will contribute a verbal or written comment to assist in the review of each student.

In addition to the Safeguarding Review meetings, the DSL/DDSLs and the SENCO meet regularly to consider students who are the subject of safeguarding concerns, and whose learning support needs may have a bearing on their safeguarding. The evaluations made and decisions taken in Safeguarding Review meetings are added to the student's profile on CPOMS.

26.2 The Students with Complex Needs Meeting. (For further details, see Appendix D.)

Where the needs of a student may be better supported by an internal multi-agency approach, they will be discussed in a weekly Students with Complex Needs Meeting. Outcomes of this meeting may include recommendations for an Early Help/Family Help Assessment or a Support/Behaviour Plan.

26.3 Monitoring

The DSL meets at least weekly with the Headmaster to discuss safeguarding concerns.

The DSL meets regularly with the Nominated Safeguarding Governor to discuss anonymised cases of students with ongoing concerns, scrutinises a range of other safeguarding practices by the College and reports back to the Safeguarding Committee and Board. (The arrangements for Governor oversight are described below in **Section 30**).

27 Safer Recruitment

The College takes seriously the responsibility to recruit staff, Governors, contractors and volunteers who are suitable to work with children. The first step to safeguarding all students is to appoint staff who share our commitment to the welfare of the students.

The College undertakes a rigorous recruitment and screening process, which is in line with KCSIE the Independent Schools' Inspectorate, and National Minimum Boarding Standards

(2026). The Human Resources team and other key staff who manage this process are trained in safer recruitment procedures.

The College will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in KCSIE and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the College's Safer Recruitment Policy and Procedure.
- ensure that we carry out all necessary checks on the suitability of people who serve as Governors in accordance with the above regulations and guidance given in KCSIE.
- carry out online searches as part of due diligence when shortlisting candidates. The College will make candidates aware that such searches are carried out.
- ensure that where staff from another organisation are working with our students either on College property or on another site, we have received confirmation from that organisation that appropriate child protection checks and procedures apply to those staff and that such checks do not raise any issues of concern in relation to the suitability of those staff members to work with children.
- ensure that where the College ceases to use the services of any person (whether employed, contracted or a volunteer) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service (DBS) as soon as possible after the person has ceased to provide services to the College and in any event within one month of the person leaving the College. This includes dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. Where a dismissal does not reach the DBS referral threshold, consideration will be given to making a referral to the Teaching Regulation Agency (TRA).

The Human Resources (HR) Manager is responsible for ensuring that all members of staff are recruited following the procedures defined in Part 3 of KCSIE. This is done in accordance with the school's Recruitment Policy. The HR Manager will ensure that the recruitment checks of all employees are retained on the College's Single Central Register.

Additionally, the HR Manager will ensure that individuals who are engaged in regulated activity with students, including volunteers and those employed by third parties, undergo the appropriate recruitment checks and are included on the **Single Central Register** where required.

Whenever a reference is requested for current or former staff, they will be completed in line with the [Issue of Reference Policy.pdf](#). This explains who can provide a work reference and what checks need to be carried out before it is signed and sent off. This is to ensure that any safeguarding concerns which the College may have about current or former staff are properly shared.

KCSIE 2026 has removed the volunteer supervision exemption i.e. if working with children for more than 3 days per 30 days or overnight (across all settings, not just one institution), the volunteer is now conducting a 'regulated activity' and needs Enhanced DBS with Barred List check, regardless of supervision. This includes visitors, self-employed contractors and those

on work experience. Schools should follow KCSIE 2026 paras. 406-410 when any pupil within their school undertakes any work experience.

KCSIE paras. 455-459 explicitly references trainee teachers in safeguarding and allegations and handled the same as supply/contracted teachers. Para. 433 states that schools would consider the Public Sector Equality Duty (PSED) before making a TRA referral. Para. 328 reinforces the need for appropriate supervision and a Barred List check if DBS is not available prior to start date.

28 Visitors

Visitors to the College are managed in line with the [Visitor Policy \(Termtime\).pdf](#) which sets out arrangements for individuals coming on site.

Staff and students in the College are made aware that only staff members wearing a black lanyard may work with students on an unsupervised basis. Students are made aware of what to do if they encounter an unescorted individual adult who is not wearing the appropriate lanyard.

29 Duties under the Human Rights Acts (1998) and the Equality Act (2010)

Following KCSIE, the College recognises the applicability of the Human Rights Act (1998) to the operation of safeguarding, and that being subject to harassment (including sexual harassment), violence, or abuse may breach these rights.

The College also recognises that, under The Equality Act (2010), it must not discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation, and also consider how to support students with these protected characteristics.

30 Staff Code of Conduct

The Staff Code of Conduct can be found at [Staff Codes of Conduct.pdf](#) or requested as a hard copy document from line managers. The Staff Code of Conduct provides clear guidance concerning staff actions and conduct in order to ensure students and staff are not at risk of harm, or of allegation of harm to a student. It sets out the behaviour expected from all members of staff, and offers specific guidance for staff in boarding houses, delivering tutorials or in one-to-one situations where they may be vulnerable to malicious accusations or for misunderstandings to occur. It also explains the major policies that staff must comply with and where to find them.

31 Responsibilities of Staff Members

Everyone in the College must be involved in promoting safeguarding. Staff must maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a student, staff must always act in the best interests of the student within the statutory guidelines for reporting concerns and summarised in the flowcharts [here](#). **We all have responsibility for ensuring the welfare of our students**, and staff must always report any concerns that they may have about a student on College's safeguarding platform (CPOMS) or using the Safeguarding Concern Reporting Form.

It is important that staff show professional curiosity at all times on matters relating to safeguarding. Even if a concern is at a low level, all staff have a duty to report it to the DSL/DDSL, if it is about a child, or to the Headmaster if it is about an adult. Staff should also know that children may not feel ready to, or know how to tell someone that they are being abused, exploited or neglected, or they may not recognize their experience as being harmful.

32 Teaching Safeguarding

The College recognises the importance of students being taught how to keep themselves and others safe, including online. The College satisfies this requirement in a variety of ways, including:

- The Christian Living (RSHE) Programme
- Year-group talks
- Visiting speakers
- House-based provision (to enable discussion in single-sex groups where this is appropriate)
- Targeted interventions with groups or individuals

The College recognises the importance of preparing students for a modern Britain with zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

The College's approach to RSHE is grounded in its Benedictine ethos, including supporting each student in striving to be the very best person that they can be, through a respect for place (including respect for the values of living together) and healthy relationships.

The College's Christian Living programme is age-appropriate and inclusive. It includes themes such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality, including for LGBT students
- How to understand healthy and unhealthy relationships
- The law in relation to consent and Harmful Sexual Behaviour, and how any form of harassment or violence is always unacceptable.

The College also recognises the additional challenges that students with SEND face in understanding safeguarding, and this is addressed through tailored support to match the needs of individuals who may otherwise struggle to access the universal provision.

Further resources for teaching safeguarding can be found at:

- [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [National curriculum in England: computing programmes of study - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

33 Responsibilities of the DSL

The DSL is a member of the College's Senior Leadership Team and is the designated senior member of staff who takes specific responsibility for child protection matters in the school.

The DSL has received child protection training which is regularly updated every two years; this training is to the highest level so that the DSL is able to train other members of staff. The DSL exercises their responsibilities in conjunction with DDSLs. The DSL and DDSLs have a job description and must fulfil their duties in line with Annex B of KCSIE.

The responsibilities of the DSL are listed below:

33.1 Management of referrals

The DSL (and Deputy DSLs, if appropriate) will:

- Refer cases of suspected abuse, neglect or exploitation to the Local Authority Children's Social Care as required
- Support staff who make referrals to the Local Authority Children's Social Care. The Multi-Agency Screening Team (MAST) can be contacted on 0300 131 2131 (the same number for the out of hours Emergency Duty Team). Online referral form [Online referral form](#). Note the Professional's Consultation Line number is available between 10am and 4pm on 01609 535070.
- Refer radicalisation and extremism concerns to the Channel panel through the universal referral form where there is a radicalisation concern, as required.
- Support staff who make referrals to the Channel panel.
- (Working with the HR Manager) refer cases to the Disclosure and Barring Service, as required, where an adult is dismissed, or has left due to risk or harm to a child.
- Refer cases where a crime may have been committed to the Police as required (999 in emergency or 101 not in an emergency). [NPCC When to Call the Police](#) informs DSL understanding of when to consider calling the police and what to expect when they do.
- If the DSL (or colleague who made the referral) considers after a referral that the child's situation does not appear to be improving, they should press for re-consideration to ensure concerns have been addressed and, most importantly, that the child's situation improves.
- Following a child protection referral, the DSL is to attend multi-agency meetings, make regular contact with Children's Social Care and contributes to Child Protection Conferences.
- Report cases of prejudice, hate based incidents or hate crimes to the Local Authority.
- Access a range of advice to help them identify children in need of additional mental health support.
- Keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as Local Authority Children's Social Care or Prevent.

33.2 Working with others

The DSL (and DDSLs, if appropriate) will:

- Act as a point of contact with the three safeguarding partners of the NYSCP (Police, Local Authority Social Care and Integrated Care Systems).

- As required, liaise with the HR Manager, or the 'case manager' if different, and the LADO for child protection concerns in cases which concern a staff member.
- Liaise with the Headmaster to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with staff, especially teachers, House teams, College nurses, the IT Manager, the pastoral team, and the SENCO on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that students' needs are considered holistically
- Liaise with the broader pastoral team, including the College nurses and counsellors, when concerns are linked to mental health;
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of students including where families may be facing challenging circumstances;
- Work with the Headmaster and the leadership team, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes: ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- Work with, and report to, the Safeguarding Lead Governor, The Safeguarding Committee and The Board of Governors.
- Ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort.
- Support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- Act as a source of support, advice and expertise for staff.
- Use the NYSCP Professional Resolution Practice Guidance, as required.

33.3 Undertaking training

The DSL (and DDSs, if appropriate) will:

- Complete statutory Safeguarding and Prevent training to provide them with the knowledge and skills required to carry out the role. This training should provide them with a good understanding of their own role and the process, procedures and responsibilities of other agencies, particularly children's social care and should be updated at least every year.
- Complete Prevent awareness training and Action Counter Terrorism (ACT) Training.

- Refresh their knowledge and skills by informing themselves from sources including official reports, and by bulletins such as those of the NYSCP and NSPCC at regular intervals, in order to:
 - Have current knowledge in areas such as the assessment process for providing Early Help/Family Help and intervention, for example through locally agreed common and shared assessment processes such as Early Help/Family Help assessments.
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
 - Ensure that each member of staff has access to and understands the College's child protection policy and procedures, especially new and part time staff.
 - Ensure that the DSL/DDSL understands training needs and delivers annual and on-going Safeguarding training for staff.
 - Make the DSL/DDSL alert to the specific needs of children in need, those with special educational needs and young carers.
 - Help the DSL/DDSL to understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
 - Enable the DSL/DDSL to keep detailed, accurate, secure written records of concerns and referrals.
 - Enable the DSL/DDSL to understand and support the College with regards to the requirements of the Prevent duty, including online safety, and provide advice and support to staff on protecting children from the risk of radicalisation.
 - Support the DSL/DDSL to access resources and attend any relevant or refresher training courses.
 - Support the DSL/DDSL to encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.
 - Support the DSL/DDSL in understanding the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the College;
 - Enable the DSL/DDSL to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation.
 - Enable the DSL/DDSL to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college.

33.4 Raising Awareness

The DSL (and DDSLs, if appropriate) will:

- Ensure the College's child protection policies are known, understood and used appropriately.
- Ensure that the College Child Protection and Safeguarding Policy and Procedures document is reviewed annually (as a minimum), the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors and staff regarding this.

- Ensure that this document is available publicly, and parents are aware of the fact that referrals about suspected abuse, neglect or exploitation may be made and the role of the College in this. (The College has developed a child-friendly version of the Safeguarding Policy so that it is fully accessible to all students in the College.)
- Link with the safeguarding partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and College leadership staff.
- Ensure that staff: know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort. This role entails also supporting teaching staff to identify the challenges that children in this group might face and putting in place the additional academic support and adjustments that they could make to best support these children.

33.5 Transferring the Child protection file

- Where students leave prior to the end of year 13 (including for in-year transfers), the College will ensure their child protection file is transferred to the new school or college within five days of starting in the new setting. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as DSLs and SENCOs or the named person with oversight for SEND in colleges, are aware as required. In addition to the child protection file, the DSL/DDSL should 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, neglect or exploitation and have that support in place for when the child arrives.
- In addition to the child protection file, the DSL should 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, neglect or exploitation and have that support in place for when the child arrives.
- The DSL/DDSL ensures that child protection records are retained for an appropriate length of time and the College has regard to any other requirement requiring specific retention periods. Ensure that, if a child goes missing or leaves to be educated at home, the child protection file is stored securely in line with College's data storage arrangements.
- The DSL/DDSL ensures that the North Yorkshire Children & Families Service is informed when the child leaves the College. [NYC Elective Home Education Policy and Procedures](#) can be accessed for further guidance.
- The College assures that Child Protection Files are maintained in line with Annex B of KCSIE.
- Information sharing and managing the child protection file and adhere to record keeping and information sharing guidance in KCSIE pages 183-185.
- The College follows KCSIE 2026 information sharing guidance (paras. 140-152) to ensure DfE guidance is adhered to.

- The College must share information on a pupil who is a risk to self or others e.g. serious violence or harmful sexual behaviour (HSB), including when a pupil has previously carried, threatened with, or used a knife or weapon

33.6 Being available

- During term time the DSL/DDSL will be available every day of the week for staff in the College to discuss any safeguarding concerns. In most instances, the DSL/DDSL will be available in person, but if not, they will be available via phone or Teams.
- To ensure continuity of safeguarding responsibilities, the College implements robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. For example, the College uses a confidential shared mailbox system to ensure that safeguarding concerns are received, monitored, and acted upon without delay. The DSL emails all staff about absence and cover for this absence.
- The College ensures that DDSs receive training appropriate to the role of a DSL.
- Whilst the activities of the DSL can be delegated to DDSs, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the DSL. This responsibility should not be delegated.

33.7 Providing support to staff

Training should support the DSL and DDSs in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.

This is to ensure that staff are supported during the referrals processes and also to promote an understanding of how safeguarding, welfare and educational outcomes are linked, including how these inform the provision of academic and pastoral support.

A safeguarding training log is held in the school recording the training that has been undertaken by the DSL, all staff, volunteers, contractors and other third parties and governors. This log is monitored and updated regularly.

33.8 Understanding the views of children

Therefore, the DSL/DDSLs should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them;
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

34 Data Protection and General Data Protection Regulations (GDPR)

The Data Protection Act (2018) and GDPR does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not prevent the obligation to safeguard and promote the welfare and protect the safety of children, as stated

in Working Together to Safeguard Children (2026), para. 31. Further information can be found in the [Information Sharing Policy.pdf](#).

[Further information may be found via Data Protection in Schools\(DfE, 2024\).](#)

35 Safeguarding Arrangements when the College's Premises are Leased by External Bodies to Provide Services to Children who are not Enrolled at the College

When students enrolled at the College are on the College site during term-time, or out of term-time but when involved in a College activity, they are always under the care of the College and its staff, apart from on specific occasions when the duty of care has been transferred to parents or guardians.

When the College hires or rents out school facilities/premises to organisations or individuals we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the College, under the direct supervision or management of staff, this child protection and safeguarding policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are provided separately by another body, the College will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed) though aspects of this policy may not apply. Where this is the case, the College will ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate as outlined in keeping children safe in education: [Using after-school clubs, tuition and community activities, and Out-of-school settings: safeguarding guidance for providers.](#)

The College will apply this approach regardless of whether or not there are children who attend any of these services whether or not the children are on our school roll or of a statutory school age. We will ensure that 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 will lead to termination of the agreement.

Where the College receives an allegation relating to an incident that happened when an individual or organisation was using our school premises running activities for children, we will follow our safeguarding policies and procedures, including informing the LADO where appropriate.

Following KCSIE, paras. 208-209, and non-statutory guidance for providers running out-of-school settings (DfE, 2022), when the College permits an external body to lease the use of its facilities to provide services to children who are not on the College roll, the College will require of that body assurances regarding the safeguarding of those children as part of any contractual arrangements.

Following Keeping Children Safe in Out of School Settings (2022) part 2, an external body leasing the premises is required to have safeguarding arrangements in place, including appropriate training of staff to follow reporting procedures, and a named adult with specific responsibility for the safeguarding of all children under its care.

External bodies leasing the College premises are given information detailing their duties to follow NYSCP safeguarding arrangements where there are concerns about a child and, following KCSIE and Keeping Children Safe in Out of School Settings (2022) part 2, the duty to report concerns regarding an adult to the LADO.

36 Regulations and safeguarding requirements relating to school premises - Toilets, Changing Rooms, Showers and Sport

The College provides separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time). The College complies with statutory guidance it must not allow children into toilets designated for the opposite biological sex. This includes where the College is responding to a request to support any degree of social transition for children who are questioning their gender.

If a gender-questioning child does not want to use the toilet, changing rooms and showers designated for their sex, the school will consider whether they can provide an alternative toilet, changing or washing facility without compromising the provision of single-sex facilities. These alternative arrangements will not compromise the safety, comfort, privacy or dignity of the child or of any other children. The College will keep records of these situations.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case, to comply with statutory guidance, there must be no exceptions.

Where there are no safety concerns and a child makes a request relating to how they participate, we will need to consider the request in light of the advice on "considering requests for support with social transition".

37 Governor Arrangements for Safeguarding

Governors take seriously their responsibility to uphold the aims of the charity and their duty to promote an environment in which children feel secure and safe from harm. The Governors ensure there is an effective Safeguarding Policy in place, which has due regard to KCSIE and that the policy is implemented in practice. They receive regular safeguarding training and have confirmed that they have read and understand KCSIE.

The Nominated Safeguarding Governor has the required knowledge, skills and expertise to be the primary point of governance oversight of the College's safeguarding arrangements. The Nominated Safeguarding Governor meets throughout the year with the Headmaster and DSL/DDSL to be appraised of all ongoing safeguarding matters and to ensure that the College's guidance and policies, and their application, are consistent with regulatory requirements.

The Safeguarding Governor chairs The Safeguarding Committee and acts with delegated authority from the Governors to ensure that College safeguarding practices and procedures (including those relating to Online Safety), and their application, are effective in keeping students safe. The Committee meets at least four times per year, but may also meet for *ad hoc* purposes if required by The Headmaster or Board of Governors. The Committee meetings have an agenda with standing items, and detailed minutes are taken and circulated.

Additionally, the Safeguarding Governor and DSL/DDSL also meet bilaterally as the need arises. The Safeguarding Committee also has oversight of the College's compliance with the regulatory requirements in respect of all matters to do with Safeguarding set out in the Independent Schools Standards Regulations.

The Chair of Governors also ensures that the DSL/DDSL provides reports to the Board as required, and that a comprehensive report is provided on an annual basis. The Governors review The Safeguarding and Child Protection Policy, and other statutory policies, on an annual basis. This includes a review of the effectiveness with which the duties contained in those policies and procedures have been discharged. In addition to this, the Senior Leadership Team regularly review whether policy and practice in safeguarding are effective and compliant with current legislation. Detailed minutes of these meetings are taken. The Safeguarding Committee also reviews changes in legislation pertaining to its remit and brought to its attention by the DSL/DDSL and identifies staff training needs with the DSL/DDSL which result from those changes.

All governors are responsible for reading and ensuring that paras. 84-106 of KCSIE 2026 are adhered to. These include 'data protection laws' (Data Protection Act 2018, the UK GDPR and the Data Use and Access Act 2025, as well as the Human Rights Act 1998, the Equality Act 2010 and the Public Sector Equality Duty.

Appendix A: Safeguarding Concern Reporting Form

Student Name					
Date		Time		Day	
Staff Name				Signature	
Form number					
Body Chart Attached	Yes		No		
Concern (Provide as much detail as possible and include the student voice where possible)					
Signed				Date	

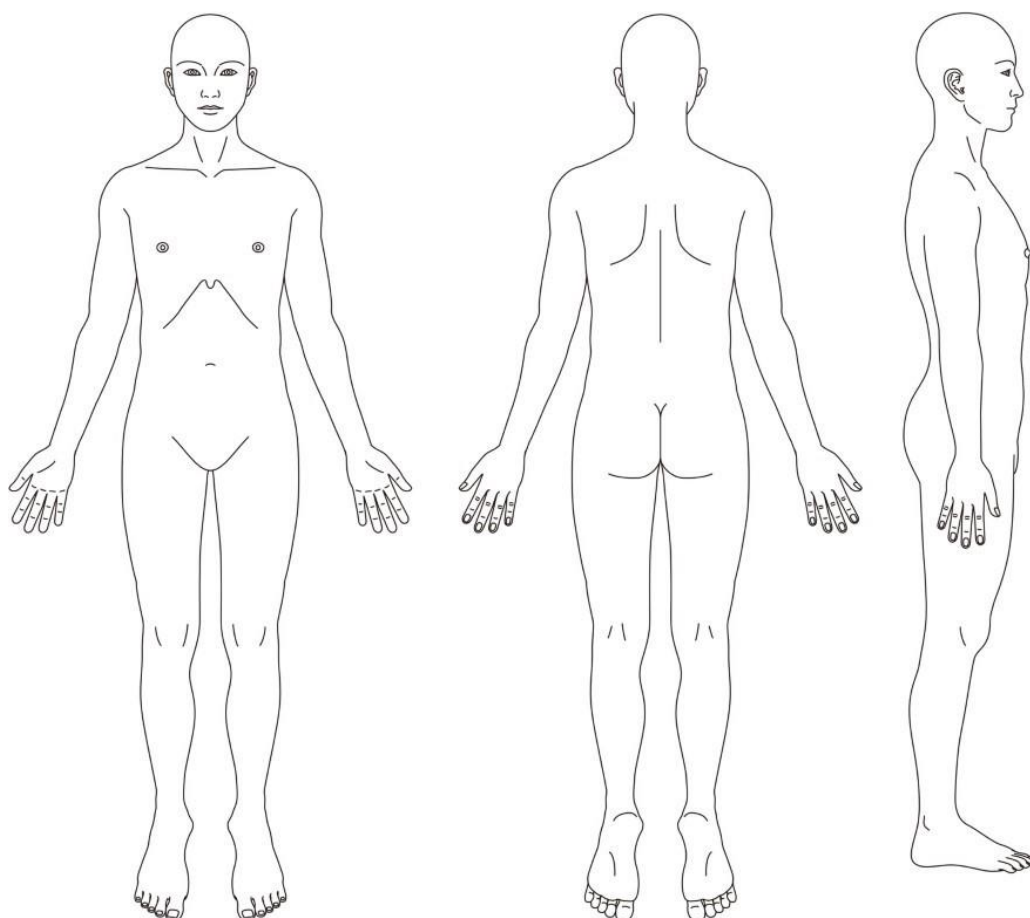
Further action required	Date of action	Action taken by	Signature

Give to DSL in person (if concern is about a student).			
Give to the Headmaster in person (if the concern is about a member of staff).			
Date given to (D)DSL/Headmaster		Time given to (D)DSL/Headmaster	
Name of (D)DSL/Headmaster		(D)DSL/Headmaster Signature	
If not possible in person please email DSLTeam@ampleforth.org.uk / headmaster@ampleforth.org.uk immediately			

DO NOT DELAY

Body chart for a safeguarding concern

Student's Name	
Observations made by	
Signed	
Date	



Appendix B: Signs of Abuse, Neglect and Exploitation

Possible signs of abuse include the following (but are not limited to these and these signs do not necessarily mean that abuse is occurring):

- the student says that s/he has been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour. For example s/he may become aggressive, challenging, disruptive or withdrawn
- the student does not want to change clothes in front of others or participate in physical activities
- the student is having problems at school, for example, a sudden lack of concentration and learning or s/he appears to be tired and hungry
- the student talks about being left home alone, with carers that appear to be inappropriate or with strangers
- the student is regularly missing from school or education
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the student's development is delayed in terms of emotional progress
- the student suddenly loses or gains weight
- the student drinks alcohol regularly from an early age
- the student is concerned for younger siblings without explaining why
- the student talks about running away
- the student shies away from being touched or flinches at sudden movements
- the student demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes
- the student appears neglected, e.g. dirty, hungry or inadequately clothed
- the student is reluctant to go home, or has been openly rejected by his parents or carers.

Signs of grooming: The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- meeting students secretly, or without seeking authorisation from House Masters or Mistresses
- collusive behaviours designed to cultivate dependency, such as:
 - unprofessional conversations about other members of staff
 - breaking School Rules over providing students with alcohol and
 - 'friending' students on social media platforms, contrary to school policy. Students who are being groomed at school or elsewhere may
- be very secretive, including about what they are doing online
- have unexplainable or persistent absences
- have older friends or girlfriends
- go to unusual places to meet friends
- have new belongings such as clothes or mobile phones that they can't or won't explain
- have access to drugs and alcohol

In older children, signs of grooming can easily be mistaken for ‘normal’ teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

Staff may find it useful to refer to the Department for Education’s guidance [What to do if you’re worried a child is being abused \(March 2015\)](#).

Local guidance and information, including our local processes for neglect referrals, is also available on the NYSCP website [here](#).

Appendix C: Safeguarding Review

Purpose of Safeguarding Review

Every week during term-time the safeguarding team will discuss with House Teams students who have been identified as having a safeguarding or significant pastoral concern. The students discussed may be identified by the House Team, the Safeguarding Team, or the Learning Support Department. The meeting will include at least the DSL or one of the DDSLs, the Housemaster/Housemistress, and where relevant to the student, the SENCO or one of their colleagues.

Safeguarding Review for individual students may occur at two levels: (i) where action is already being taken, there will be a brief update, and the logging of any action points; (ii) where the concern is at a higher level, or where there are more complex needs, there will be a more formal review using the Safeguarding Review template.

A more formal review will consider the incident/concern, and of the outcomes of any actions already undertaken; and the identification of any further steps that are required.

Safeguarding Review meetings may also decide whether a specific concern or incident that has been raised on CPOMS should be closed, or remain open for further monitoring, and whether the student should be automatically discussed the following week. Consideration will also be given to the relationship between the individual's safeguarding and Learning Support or medical needs, and also whether they have been affected by Harmful Sexual Behaviour (HSB) or other concerns.

At the end of the Safeguarding Review meeting the notes will be saved to the relevant student profiles on CPOMS. Where a student is identified as having complex needs, they may also be discussed in the Students with Complex Needs meeting.

Appendix D: Students With Complex Needs Meeting

On a weekly basis the Senior Deputy Head chairs an inter-agency meeting in which students who are deemed to have complex needs are discussed.

Participation in this meeting includes: The Headmaster, The Senior Deputy Head, The Deputy Head Academic, The Deputy Head Pastoral, The DSL and the SENCO.

Actions arising from this meeting are as required by The Senior Deputy Head, and may include Team Around the Family Meetings, a Support Plan or an Early Help/Family Help Assessment.

Appendix E: Other policies relevant to Safeguarding

The following policies are also relevant to Safeguarding at Ampleforth College:

Administration of Medicines policy

AI Policy

Allergy Safety policy

Anti-bullying policy

Attendance and Supervision Policy (includes Missing Student policy)

Behaviour Policy

Christian Living incorporated PSHE Policy

CCTV Policy

Drugs and Substances Policy

Eating Disorders Policy

Educational Visits Policy

Health and Safety Policy

Investigations Policy

Major Sanctions Policy

Mobile Phone Policy

Online Safety Policy

Physical Contact and Physical Intervention Policy

Prevent Policy

Relationship, Sex, Health Education Policy

Rewards and Sanctions Policy

Safer Recruitment Selection and Disclosures Policy

SEND Policy

Staff Codes of Conduct (includes Low-Level Concerns)

Statement of Boarding

Students' Complaints and Concerns Policy

Students with health needs who cannot attend the College

Visitor (termtime) Policy

Whistleblowing Policy

Appendix F: Safeguarding in External Lettings and Public Use of College Facilities

1. Purpose

This annex sets out the safeguarding arrangements for all external organisations, community groups, and individuals who use the college site under lettings or public access agreements. It ensures compliance with *Keeping Children Safe in Education (KCSIE) 2026* and clarifies responsibilities relating to both **children** and **vulnerable adults** using the premises.

It supplements the college's main Safeguarding and Child Protection Policy, which continues to apply to all safeguarding matters arising on the college site, regardless of whether activities are delivered by college staff or external providers.

This annex applies to:

- All external organisations, hirers, and service providers with children, young people or vulnerable adults using SLET facilities.
- Public and commercial lettings, including SAC and SLET activities.
- Any children, young people, or vulnerable adults from external organisations participating in activities on college premises.

2. Key Principles

1. Safeguarding duties apply to all site users.

The college has a responsibility to safeguard all children and young people on its premises, not solely enrolled pupils.

2. External organisations remain responsible for their own safeguarding practice.

Hirers must have appropriate safeguarding policies, procedures, and safer recruitment measures in place.

3. The college retains oversight of any safeguarding concerns arising onsite.

Any allegation or concern involving external users must be reported to the college's Designated Safeguarding Lead (DSL) and managed in line with existing procedures, including referral to the LADO where relevant.

4. Safeguarding responsibilities for vulnerable adults must be clearly understood.

Safeguarding expectations must extend to vulnerable adults accessing the site, recognising that procedures differ from those relating to children.

3. Roles and Responsibilities

3.1 Designated Safeguarding Lead (DSL)

The College DSL, retains **overall responsibility** for:

- Oversight of all safeguarding concerns occurring on college premises.
- Decision-making regarding referrals, LADO notifications, and escalation.
- Ensuring the college's safeguarding systems cover lettings, community use, and vulnerable adults where relevant.
- Providing advice and support to staff and external providers as required.

3.2 Lettings Safeguarding Lead

To support safeguarding within lettings and public activities, the Lettings Safeguarding Lead is responsible for:

- Being the initial point of contact for safeguarding concerns arising from lettings or external users.
- Ensuring external groups understand their safeguarding responsibilities and provide required documentation (e.g., policies, DBS assurances).
- Monitoring compliance with lettings safeguarding expectations.
- Escalating any concerns immediately to (DSL) and following the college's reporting process.
- Attending relevant training; this includes additional safeguarding training relating to vulnerable adults.

4. Safeguarding Expectations for External Organisations

All external organisations using the college site must:

- Have their own safeguarding/child protection policies and safer recruitment procedures.
- Confirm that staff and volunteers are appropriately vetted (e.g., DBS checks).
- Identify their own safeguarding lead for the duration of the activity.
- Report any safeguarding concern arising during their activity immediately to the Lettings Safeguarding Lead or college DSL
- Cooperate fully with the college in sharing information regarding any safeguarding allegations or incidents.

Failure to meet safeguarding expectations may result in the termination of the lettings agreement.

5. Reporting and Escalation Procedures

1. Any safeguarding concern involving a child or vulnerable adult during a letting's activity must be reported to the Lettings Safeguarding Lead as the first point of contact.
2. The Lettings Safeguarding Lead will record the concern using the college's safeguarding reporting system.
3. The Lettings Safeguarding Lead will immediately notify the DSL.
4. The college DSL will determine the next steps, which may include:
 - a. contacting the LADO
 - b. completing a referral to local authority safeguarding partners for children or adults
 - c. informing the headteacher
 - d. taking action under college or contractual procedures
5. All concerns must be processed in accordance with the college's Safeguarding and Child Protection Policy.

6. Vulnerable Adults

Where lettings involve vulnerable adults:

- External providers must demonstrate they have appropriate adult-safeguarding procedures.
- The Lettings Safeguarding Lead must ensure she has the necessary training to recognise and respond to adult-safeguarding concerns.

- Any adult-safeguarding concerns arising onsite remain subject to the college's escalation processes, with oversight from the DSL.

7. Monitoring and Review

This annex will be reviewed annually or following:

- significant safeguarding incidents involving external users
- changes to lettings arrangements
- updates in statutory guidance (including KCSIE)

Updates will be reported to the Safeguarding Committee and included within relevant FGB agendas.

Appendix G: Staff dealing with disclosures

Staff must immediately report:

- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
- Any explanation given which appears inconsistent or suspicious;
- Any behaviours which give rise to suspicions that a child may have suffered harm (e.g., significant changes in behaviour, worrying drawings or play);
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- Any concerns that a child is presenting signs or symptoms of abuse, neglect or exploitation;
- Any significant changes in a child's presentation, including non-attendance;
- Any hint or disclosure of abuse, neglect or exploitation received from the child, or from any other person, including disclosures of abuse, neglect or exploitation perpetrated by adults outside of the family or by other children or young people;
- Any concerns regarding person(s) who may pose a risk to children (e.g., staff in school or person living in a household with children present) including inappropriate behaviour e.g., inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images;
- Any concerns related to exploitation and serious crime, including knife crime;
- Any concerns relating to child-on-child abuse;
- Any concerns relating to youth produced sexual imagery (sexting); and
- Any concerns relating to a child's engagement with extremist groups or ideologies.

Staff should:

- Stay calm.
- Listen to and take seriously any disclosure or information.
- Try not to show signs of shock or disbelief.
- Do not express feelings or judgements.
- Allow the child to talk freely and avoid asking leading questions (TED questions are advised – tell me, explain and describe).

- Reassure the child and explain that they have done the right thing in telling you.
- Never promise confidentiality, you have a duty to refer.
- Explain to the child, what you have to do next and who you have to contact.
- Record the information / disclosure immediately in the child's 'own words.'
- Record the facts and do not put your own judgement within the record. Always record who was present, date, time, the questions you asked and what the child has said in their own words.
- Report the incident to the DSL.
- Do not disclose this information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Appendix H: Other statutory legislation

Children's Wellbeing and Schools Act 2026

- Statutory multi-agency child protection teams now bring police, health and children's social care together.
- Local housing authorities must notify schools when a child is placed in temporary accommodation.
- There is a unique children identifier across services.
- Local authorities must offer family group decision-making meetings before applying for care or supervision and they have a duty to keep register for children not in school.

Crime and Policing Act 2026

- 'Cuckooing' (taking control of a home for criminal purposes) is a new offence.
- There is a mandatory duty to report child sexual abuse to police and children's social care.
- CCE is a new standalone offence new (doesn't need to be proved through other offences).
- Grooming is now statutory aggravating factor when sentencing for sexual offences against children.
- Supervised volunteer exemption removed

Working Together to Safeguard Children 2026

- Introduction of Family Help – Family Help combines 'targeted early help' and section 17 support to create a 'seamless system of help and support for children and families'. Understand local threshold and referral process. Information sharing and early support are essential
- A focus on challenging racism and discrimination. It reinforces expectations on leaders to create inclusive, anti-discriminatory cultures and for practitioners "to challenge racism and discrimination"
- Stronger multi-agency safeguarding arrangements. This includes clearer detail on accountability structures and how safeguarding partners are inspected.
- Learning from serious child safeguarding incidents. This section has been re-structured to ensure safeguarding partners better understand how and when to make "timely, accurate and comprehensive notifications" and engage in the learning process.

Early Years Foundation Stage (EYFS) statutory framework

- KCSIE 2026 para. 386 notes that for EYFS volunteers, ‘where schools are also subject to the EYFS framework, volunteers must not be permitted to begin working within the settings covered by the EYFS framework until the school or maintained nursery school has received the volunteer’s enhanced DBS certificate including barred list information.’