



Safeguarding and Child Protection Policy

2026 - 2027

Safeguarding and Child Protection Policy

Ownership & Consultation	
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Safeguarding and Child Protection Policy

This policy is to be read in conjunction with our Online Safeguarding Policy and our Acceptable Use and Digital Safety Policy

This policy is based upon Keeping Children Safe in Education (2026) and will be reviewed following publication of any updated statutory guidance.

1. Safeguarding in our school

Our aims and responsibilities

Our commitment is to safeguard and promote the welfare, health (including mental health) and safety of our pupils/students by creating and maintaining an open, safe, caring and supportive atmosphere when working in an online learning environment. This includes:

- Proactively teaching pupils/students about safeguarding and teaching children how to safeguard themselves when learning in an online, digital environment
- Ensuring that systems and procedures are in place to protect pupils/students; and to always act in the best interests of the child.

To fulfil our responsibility effectively Sophia High makes sure our approach is child centred and that we determine how best to build trusted relationships with children and young people. This means that we consider, at all times, what is in the best interests of the child.

Keeping pupils/students and teachers safe during remote education is essential. The overall aim of the policy is the safeguarding of students we are helping to educate in the online learning environment. The emphasis of the policy is on prevention, through support and guidance. As per government guidance, at Sophia High School, this policy and practice ensures that our online educational provision and remote learning environment is safe, high quality and aligns as closely as possible with the expectations of the in-school environment.

We perform full enhanced DBS checks to ensure nobody who is deemed unsuitable works with our students. Our prime consideration and responsibility are to the student who is susceptible. We will ensure all staff have enough training to recognise key markers which may indicate abuse. Ensure all staff are fully aware of the referral procedures, ensure clear communication between the school and relevant agencies where referral has been made.

All staff have the following responsibilities:

Contribute to providing a safe online learning environment in which all children can learn and flourish

- Know what to do if a child tells you that he or she is being abused or neglected
- Know what to do if you are concerned about the behaviour or conduct of a student in the school
- Know what to do if you are concerned about the behaviour or conduct of an adult (staff or parent) in the school
- Manage the requirement to maintain an appropriate level of confidentiality

- Identify children who may benefit from Early Help (also referred to as Family Help where applicable within local safeguarding arrangements)
- Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSL
- Be aware of our UK Early Help (also referred to as Family Help where applicable within local safeguarding arrangements) process and our role in it; as well as international organisations with the responsibility to safeguard children
- Be aware of the process for making a referral to Children's Social Care in the area where the child is residing and understand the role you might be expected to play in statutory assessments.
- Use mobile phones and personal devices professionally and responsibly. Personal mobile phones must not be used for personal reasons during live lessons, tutorials, assemblies, safeguarding meetings or other student-facing activities. Where personal devices are required for legitimate professional purposes, including safeguarding, multi-factor authentication, communication with colleagues, accessing school systems or supporting teaching and learning, their use is permitted.

Sophia High School provides an especially safe and constructive way for today's students to learn with technology.

Staff members with specific safeguarding responsibilities:

DSL: Katy Todd

DDSL: Nicole Pelletier

EDDSL: Tyler Wilson

Immediate Reporting of Concerns

Any member of staff who has a concern about a child's welfare must act immediately.

Staff must not assume that somebody else has taken action and must not delay reporting concerns while seeking additional evidence or clarification.

Concerns should be reported to the DSL or Deputy DSL without delay and recorded in accordance with school procedures.

Where a child is at immediate risk of harm, staff should contact emergency services and/or children's social care directly and inform the DSL as soon as possible.

Recording Safeguarding Concerns

Suggested wording:

All safeguarding concerns, disclosures and incidents must be recorded promptly, accurately and objectively.

Records should include:

- a summary of the concern;
- actions taken;
- decisions made;

- the rationale for decisions;
- outcomes achieved;
- details of any referrals made;
- dates, times and the individuals involved.

Safeguarding records will be stored securely and separately from the main pupil file where appropriate.

The school's online platform (Google Classroom) is secure and accessible only by enrolled pupils/students, their parents and school staff. All online students pledge to uphold the acceptable use policy and receive instruction in good digital citizenship and Internet safety. All Sophia High School staff are carefully screened and specially trained to ensure a positive school environment for everyone.

Definition of Safeguarding

The guidance states safeguarding and promoting the welfare of children is about:

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

According to the statutory guidance "Working Together to Safeguard Children" published by the UK Department for Education in March 2026, the definition of a child is:

"Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection."

The guidance further outlines that children are classified as being "in need" for protection under certain living arrangements or circumstances, including:

- Children subject to a care order made by the courts
- Children looked after by the local authority/health and social care trust
- Children remanded by a court to youth detention accommodation
- Children living away from home in private fostering arrangements
- Children whose living arrangements do not adequately safeguard or promote their welfare
- Disabled children living away from home

In our school, Safeguarding is everyone's responsibility.

Staff should maintain an attitude of "it could happen here" and remain vigilant to signs that a child may be in need of help or protection. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Data protection legislation should not be a barrier to sharing information where the failure to do so would place a child at risk.

Who this policy applies to

This policy and procedure apply to all pupils/students in the school.

This policy and procedure apply to all teaching, non-teaching, residential, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers, non-school based Sophia staff and any other adults working at the school. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned, unless otherwise stated. Throughout the document, the term DSL is used for the Designated Safeguarding Lead.

This Safeguarding Policy and the Code of Conduct apply to all pupils/students and adults in the school.

Inter-agency working

The school is committed to inter-agency, both in the UK and internationally, working in order to secure the best levels of safeguarding for all of our students. The school contributes to inter-agency working in accordance with statutory guidance. The school works with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

Safeguarding international students:

Given the nature of students at Sophia High School, it is of imperative importance that all our students are covered by the same safeguarding expectations we have of all our UK students. International students will be safeguarded following what is detailed by the DfE as Good Practice.

- Sophia High is able to contact the embassies of all countries within which our students reside
- Sophia High is able to contact the British consulate and council within the regions within which our students reside
- Sophia High is in contact with the different local authorities, including the local police and Ministry of Foreign Affairs, within which our students reside
- Any issues will be dealt with in accordance with the rules and regulations outlined by the said authorities in the respected countries, for keeping children safe. Sophia High follows the [NSPCC guideline](#) regarding Safeguarding and Child Protection in school.

As a school we are also aware of the cultural diversity of the community around us and work sensitively to address the unique culture of our students and their families as they relate to safeguarding and child protection. This includes children at risk of harm from abuse arising from culture, faith and belief on the part of their parent, carer or wider community. Staff must report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

Definitions and terminology

'Children' includes everyone under the age of 18

'DSL' refers to the school's named Designated Safeguarding Lead

'Designated Officer' refers to the person appointed by the local authority to deal with allegations against adults

'2026' refers to the statutory guidance Keeping Children Safe in Education

Related documentation

This policy should be read in relation to the most current version of the following documents: National documents:

The Independent School Standards 2026 (April 2026)

Keeping Children Safe in Education (2026) (September 2026)

Filtering and monitoring standards March 2022) (Updated April 2026)

Cyber security standard (March 2022) (Updated April 2026)

Working together to improve school attendance 2024 (August 2024) (Updated April 2026)

Working together to safeguard children 2026 a guide to multi agency working 2026 March 2026

Safeguarding and Remote Education - Guidance (March 2022)

Prevent Duty Guidance: for England and Wales (March 2024)

Information Sharing Guidance for Safeguarding Practitioners Information Sharing Guidance (May 2024)

Disqualification under the Childcare Act (July 2018)

Mental Capacity Act 2005 (Children 16+)

The Equality Act - 2010 Equality Act 2010 (Updated May 2026): Guidance Gov UK – Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils/students with certain protected characteristics in order to meet their specific need. SHS could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. There is also a duty to make reasonable adjustments for disabled children and young people.

The United Nations Convention on the Rights of the Child (UNCRC) United Nations Convention on the Rights of the Child

What to do if you are worried a child is being abused – Advice for practitioners (departmental advice) (March 2015)

<https://www.coe.int/en/web/children/strategy-for-the-rights-of-the-child> (2022-2027)

This policy is updated annually, drawing on feedback from staff, and is published to all staff and volunteers and placed on the school website.

We will also make sure the following is adhered to:

- Ensure teachers and other critical members of staff are integral part of the safeguarding process
- Accept that safeguarding students is a priority for all members of staff
- Ensure all staff are fully trained to the possibility that a student is at risk of suffering harm and know the procedures to follow to report suspicions to the relevant agencies, in particular with reference to the online education and home-schooling context for UK based and International Students.
- Share our concerns with relevant agencies and keep records of our sharing of concerns
- Safeguard against instances of bullying and take steps to stop such bullying as soon as it has been brought to our attention
- Where children are 16+ - Safeguarding decisions should take account of the ability to give informed consent and comply with the Mental Capacity Act 2005. The Mental Capacity Act 2005 is a law that protects vulnerable people over the age of 16 around decision-making. It says that: Every adult, whatever their disability, has the right to make their own decisions wherever possible.

In our school, if we have suspicions that a child's physical, sexual or emotional well-being is being, or is likely to be, harmed, or that they are being neglected or abused, we will follow the procedures set out by the statutory guidance for schools and colleges: Keeping children safe in education (September 2026), 'Working Together to Safeguard Children' Guidance March (2026), if we come into contact with alleged or suspected cases of child abuse.

This policy is based on KCSIE 2026 and any references to national guidance made within this document are in relation to the versions listed above. The school will always refer to the above statutory guidance as the benchmark for all safeguarding practice and decision making.

Internal documents:

- Behaviour Policy
- Digital Safety Policy
- Online Safety Policy
- Exclusion Policy
- Preventing Extremism and Radicalisation Policy
- Safer Recruitment Policy
- Staff Code of Conduct and Acceptable Use Policy
- Child-to-Child Abuse Policy
- Youth Produced Sexual imagery Policy

Safer recruitment

Our school prioritises embedding a culture of safer recruitment as part of our strategy for preventing harm to children. Statutory procedures for checking the suitability of staff and volunteers who work with children are always followed (see Safer Recruitment Policy).

Policy review

The school carries out an annual review of this policy. This includes an evaluation of the extent to which these policies have been effectively implemented throughout the school.

The school will remedy any deficiencies or weaknesses in child protection arrangements without delay and without waiting for the next policy review date, should any be necessary.

Staff are invited to contribute to and shape safeguarding arrangements based on reflection and learning. Staff are invited to contribute to the review of this policy.

2. Key safeguarding facts

The safety and wellbeing of our pupils is our number one priority		
Safeguarding and promoting the welfare of children is everyone's responsibility	We operate within a culture of openness and recognise and accept that abuse can happen in any organisation	We are a 'sharing organisation' All concerns should be reported
All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL)		
In the event that a child is in immediate danger or at risk of harm, a referral should be made to Children's Social Care and/or the police immediately		
An allegation about another adult in school should be referred to the DSL	An allegation about the DSL should be referred to the CEO	Any concern or 'nagging doubt' about an adult or child should be sent to the DSL
This policy must be read alongside 'Keeping Children Safe in Education' – DFE Statutory Guidance		

3. Key people and contacts

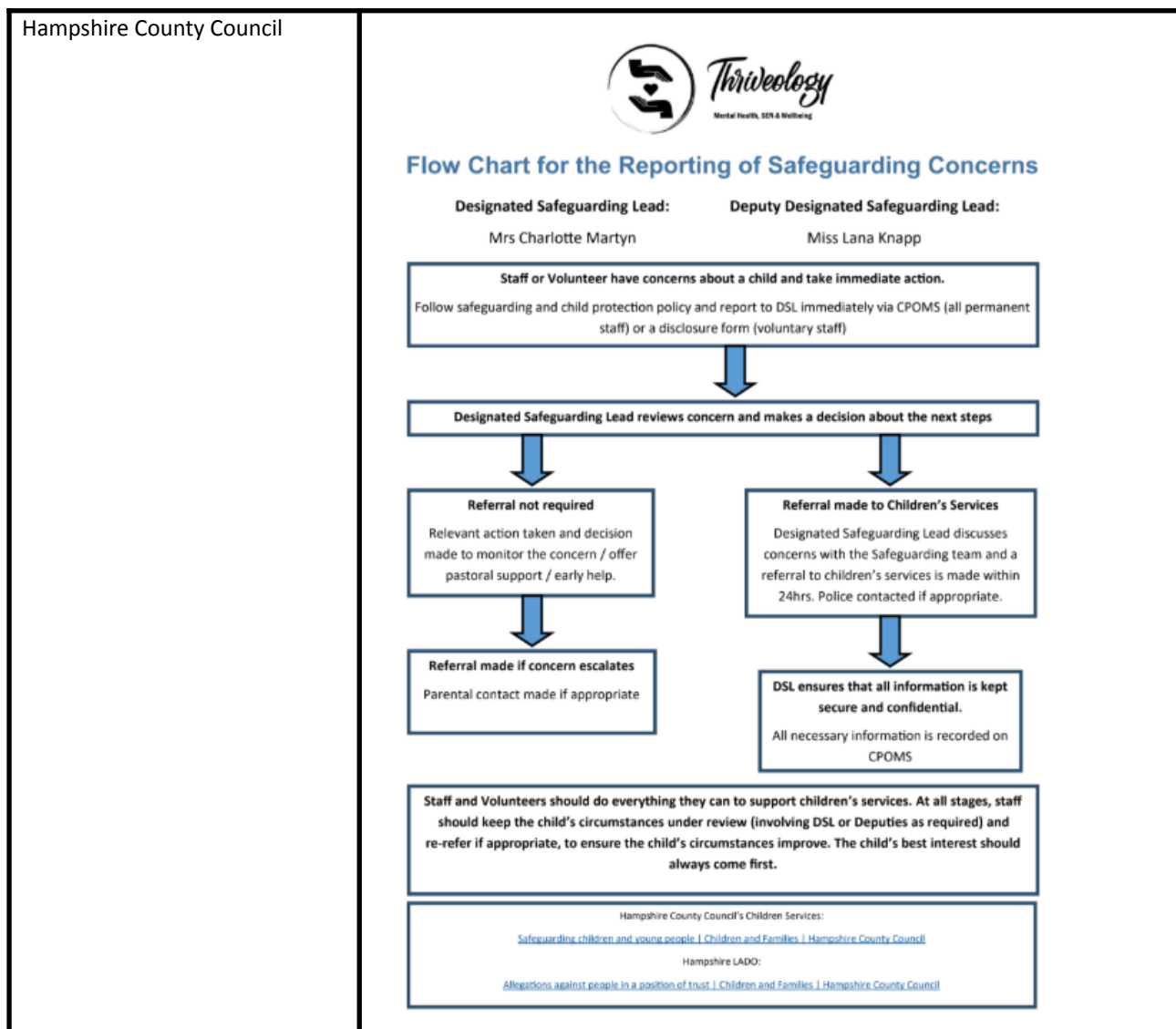
School Contacts	
Designated Safeguarding Lead (DSL)	Katy Todd katy.todd@sophiahigh.school
DDSL	Nicole Pelletier nicki.pelletier@sophiahigh.school
EDDSL	Tyler Wilson tyler.wilson@sophiahigh.school
Any other staff trained to DSL level	Melissa McBride ceo@sophiahigh.school
Board of Directors	Vanessa Temple vanessa.temple@sophiahigh.school
Prevent Lead	Katy Todd
Data Protection Officer	Fernando Darcie fernando.darcie@sophiahigh.school
Board Members	Melissa McBride (Chair /Co-Founder / CEO - Sophia) - Ø Child Protection for School Governors and Trustees - Ø Safer Recruitment in Education - Ø GDPR in Education - Ø FGM - Ø Prevent - Ø Cyber Security Training Dan Turner (Executive Director / Co-Founder) - Ø Child Protection for School Governors and Trustees Vanessa Temple (Director of Education) - Ø Safeguarding Children Level 3 - Ø UAE Pro-League Child Safeguarding Officer - Ø FAA First Aid for Mental Health (RQF) Level 2 - Ø Safer Recruitment in Education - Ø GDPR in Education - Ø Children's Mental Health - Ø FGM - Ø Forced Marriage - Ø Prevent - Ø Cyber Security Training

Reporting: DSL ----- Chair of the Board ----- Board of Directors ---- Executive Director

Contact information for the statutory bodies

Local Authority Contacts	
Our school follows the safeguarding protocols and procedures of our Safeguarding Partners	Westminster 02076414000 ChildrensServices@westminster.gov.uk RBKC 020 7361 3013 Rupinder.virdee@lbkc.gov.uk LBHF 020 8753 6600 Christine.mee@lbhf.gov.uk <u>The local authority</u> Multi-agency Safeguarding Hub (MASH) 2nd Floor Town Hall Extension the local authority High Street London SW18 2PU Telephone: 020 8871 6622 Email: mash@the local authority.gov.uk Outside of normal office hours (after 5pm weekdays or on weekends): 020 8871 6000. If you are a professional making a referral, you should complete the Multi-agency Referral Form (MARE). <u>the local authority</u> Links: https://wscp.org.uk/find-help/links-and-web-resources/ Service Manager - Safeguarding Indeep Sethi - 07920 874478 Indeep.sethi@richmondandthe local authority.gov.uk Education Safeguarding Lead Officer Sophie Allen - 07866 956554 Sophie.allen@richmondandthe local authority.gov.uk
Local authority children's social care referral team(s)	Bi-Borough Multi Agency Safeguarding Hub 020 764 7793 <u>the local authority</u> Contact MASH
The Designated Officer for child protection (sometimes referred to as the LADO)	Kembra Healy 020 8753 5125 Kembra.healy@lbkc.gov.uk <u>the local authority</u> LADO@the local authority.gov.uk LADO, Anita Gibbons - 07974 586461 Interim LADO Alice Peatling, alice.peatling@richmondandthe local authority.gov.uk
The Designated Officer for child protection (sometimes referred to as the LADO)	Walsall: Morag Manson, Safeguarding Coordinator-Education and Early Years, Walsall Council Morag.Manson@walsall.gov.uk Tel: 07342075937 LADO - 01922 652322

Local authority Prevent Lead	Jake Butterworth Hammersmith and Fulham/RBKC 020 8753 5843 Jake.butterworth@lbhf.gov.uk <u>the local authority</u> Contact MASH
Worcestershire County Council	If you are you worried that a child is suffering, or is likely to suffer, significant harm and needs immediate protection: • contact the police on 999 if there is an immediate risk of danger • otherwise contact the Family Front Door on 01905 822 666 from Monday Friday 8.30am to 5.00pm (until 4:30pm on a Friday) • out of office hours (5.00pm to 8.30am weekdays and all day weekends and bank holidays) contact the Emergency Duty team on 01905 768020 • In Worcestershire the LADO can be contacted at: 01905 846221 Online Referral Form https://lcsportal.worcschildrenfirst.org.uk/web/portal/pages/referral
Doncaster County Council  The graphic shows a two-step process for the Early Help Enquiry form. Step 1 is 'Identify a local practitioner' and Step 2 is 'Children's Social Care Referral & Response'. It includes a 'start now' button and a 'One form (one front door), Two responses' header.	If the child you are concerned about lives within Doncaster County Council, please contact: Where you believe there is immediate risk of significant harm the police should be contacted on 999. Doncaster LADO contact details Tel: 01302 737332 Email: LADO@doncaster.gov.uk Urgent concerns regarding a child or young person's mental health If you have urgent concerns regarding a child or young person's mental health please call the duty team on 01302 796 191. Urgent safeguarding concerns For urgent safeguarding concerns please call the Duty team, on 01302 737 777. Otherwise complete the form below by clicking the 'start now' button. <u>Use this form if you have a concern about a child or want to enquire about Early Help.</u> (also referred to as Family Help where applicable within local safeguarding arrangements) You can complete the form which will go to One Front Door and you will get one of two responses. In order for this form to be processed it must be completed in full and consent must be provided (only if a child would be put at risk can a form be submitted without consent).



Police	
Local Police Emergency	999
Local Police non-emergency	101

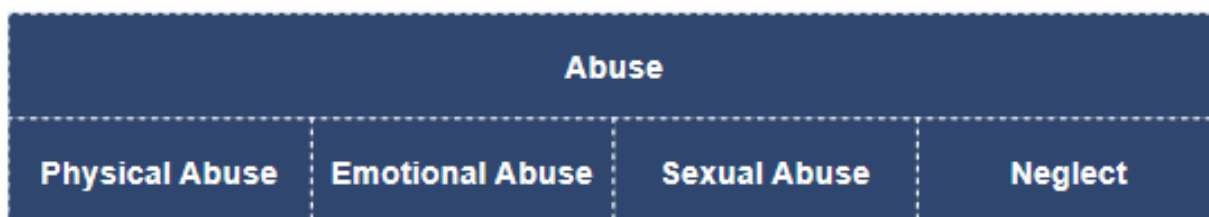
Location of local authority safeguarding and child protection documents in school	
Local authority documents, e.g. thresholds, referral forms and related guidance can be found (these should be relevant to the area where the child is residing):	DSL Safeguarding Shared Drive (Secure)

National Contacts	
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: help@nspcc.org.uk

NSPCC Text line	88858
NSPCC Childline	Tel: 0800 1111
NSPCC FGM helpline	Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 (8am – 8pm) Email: help@nspcc.org.uk
DfE Prevent helpline for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF)	Tel: 0800 1000 900 Email: help@stopitnow.org.uk www.parentsprotect.co.uk
National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com

4. Types of abuse

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.



Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Domestic Abuse:

We are aware that living in a house of domestic abuse is frightening for a child. Children living in such an environment are likely to become victims of other abuses.

Where staff have suspicions, abuse is occurring in the home they will be watchful for signs of students:

- Becoming aggressive
- Displaying anti-social behaviour
- Suffering from depression or anxiety
- Failing performance at school
- Not delivering homework assignments

Where such concerns are noted, staff will refer their notes onto the DSL Team for review and further action.

During live online lessons, there may be background scenes viewed through the screen by the teachers which cause concern and these must be reported immediately to the DSL. Similarly, parents contributing to online lessons with Early Years pupils/students may witness, or understand in another language, that some form of abuse may be occurring in another household, and report this to the teacher. Any incident witnessed or discussed in this way must be reported immediately to the DSL.

Physical abuse:

Physical abuse 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.

Signs of physical abuse can include:

- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- Respiratory problems from drowning, suffocation or poisoning;
- Untreated or inadequately treated injuries;
- Bruising which looks like hand or finger marks or caused by an implement;
- Cigarette burns, human bites; or
- Scarring, scalds and burns.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs of emotional abuse tend to be behavioural rather than physical (see below).

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by

Penetration (for example rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Signs of sexual abuse displayed by children may include:

- Pregnancy
- Sexually transmitted infection/diseases;
- Pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth;
- Urinary infections;
- Difficulty walking or sitting or standing;
- Persistent sore throats; or
- Stomach ache.

Neglect

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

Signs of possible neglect include:

- The child seems underweight or is very small for their age, or their weight deteriorates;
- The child seems very overweight for their age;
- They are poorly clothed, with inadequate protection from the weather;
- They are often absent from school for no apparent reason; or persistently arrive late
- They are regularly left alone, or in charge of younger brothers or sisters.

Child-on-child abuse

All staff must be alert to possible indicators of safeguarding concerns which may indicate child-on-child abuse. Child-on-child abuse can take many forms and may occur both online and offline. Although Sophia High School operates as an online school, staff must maintain an attitude of "**it could happen here**" and recognise that all forms of child-on-child abuse remain possible. All concerns and reports will be taken seriously, investigated appropriately and managed in accordance with this policy and the Child-on-Child Abuse Policy.

Child-on-child abuse includes, but is not limited to:

- Bullying (including cyberbullying)
- Sexual violence
- Sexual harassment
- Sharing of nudes and semi-nudes (also known as youth-produced sexual imagery)
- Upskirting
- Initiation or hazing-type violence and rituals
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Emotional abuse
- Abuse within intimate personal relationships between children
- Causing someone to engage in sexual activity without consent
- Misogynistic behaviour
- Harassment or discrimination linked to sex or gender
- Behaviour influenced by harmful online content, harmful influencers or online communities that promote abusive, discriminatory or controlling attitudes.

Staff should recognise that the online nature of the school's provision may alter how some forms of abuse present; however, it does not remove safeguarding responsibilities. Online abuse, coercive behaviour, sexual harassment, exploitation and other forms of child-on-child abuse can occur through digital platforms and must be responded to promptly and appropriately.

Child-on-child abuse may also include:

- misogynistic behaviour;
- harassment or discrimination linked to sex or gender;
- behaviour influenced by harmful online content, harmful influencers or online communities that promote abusive, discriminatory or controlling attitudes.

See our Child-On-Child Abuse Policy

Honour Based Violence (HBV) (including Female Genital Mutilation (FGM), Forced Marriage (FM) and breast ironing)

HBV

HBV includes all incidents or crimes which have been committed to protect or defend the honour of the community and/or the family, and commonly involve practices such as FGM, forced marriage and/or breast ironing. Abuse often involves a wider network of family or community pressure and therefore it is important to be aware of this dynamic and consider risk factors when deciding on action. If staff have a concern that a child may be at risk of Honour Based Violence, they should alert their DSL immediately.

FGM - This is more difficult to spot in an online school.

FGM is abuse that encompasses all procedures involved in the partial or total removal of female external genitalia and is illegal in the UK. Whilst all staff should speak to the DSL (or deputy DSL) with regard to any concerns about FGM, there is a specific legal duty on teachers under the FGM Act (2003) to report FGM.

If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, it is mandatory that the teacher must report this to the police local to the child's residence, using the telephone number 101.

All our staff have received training on this.

Forced Marriage - This is more difficult to spot in an online school

The age of marriage in England has now been moved from **16 to 18**. As a result, susceptible children across England and Wales will be better protected from the damaging impact of forced marriage. Forcing a person into marriage is a crime in England and Wales. FM is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage. The FM Unit provides more guidance, which can be found [here](#). Multi-Agency guidelines, which focus on the role of schools, can be found [here](#)

All staff have received training on this.

Breast ironing - This is more difficult to spot in an online school

Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother, who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education, rather than be forced into [early marriage](#).

This will be harder to see in our online school, as normally teachers can only see their faces. Teachers will need to be a bit more aware of female students if they come from countries where Breast ironing is practised and more prominent: Cameroon, Benin, Ivory Coast, Chad, Guinea-Bissau, Kenya, Togo, Zimbabwe and Guinea-Conakry, especially if they are missing from school and you know they are travelling to these regions.

Prevent Duty

Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

We are aware of the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 to protect young people from being drawn into terrorism.

This is a safeguarding matter like any other and these processes will be applied to support children and their families where vulnerabilities are identified.

All staff complete Prevent training.

We offer Learning Effectively Online Safeguarding Training to parents in order to share how to put in place and monitor appropriate web filtering systems so that students cannot view potentially extreme materials at home.

Staff understand the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to changes in the attitudes of students, which may indicate they are susceptible to an extremist ideology and / or at risk of radicalisation

See Keeping Children Safe in Education 2026 and the SHS Preventing Extremism and Radicalisation Policy for further information.

Behavioural signs of abuse and neglect

If a child is being abused, their behaviour may change in a number of ways. For example, they may:

- Behave aggressively or be disruptive, act out, demand attention and require more sanctions than other children;
- Become angry or disinterested and/or show little creativity;
- Seem frightened of certain adults;
- Become sad, withdrawn or depressed;
- Have trouble sleeping;
- Become sexually active at a young age;
- Exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
- Refuse to change for gym or participate in physical activities;
- Develop eating disorders;
- Self-harm;
- Refuse to attend school or run away from home
- Lack confidence or have low self-esteem; or Use drugs or alcohol.
- At a most basic level teachers need to inform the DSL or the Deputy DSL by email, if they notice a pattern of signs that include:
 - Poor attendance
 - Change in behaviour
 - Health or emotional health concerns
 - Bullying

Students missing sessions:

We place great importance on student attendance at Sophia High and take students missing sessions with great seriousness. We recognise that all children are entitled to a full education. But that a child going absent from education is a potential red flag for abuse or neglect.

We ensure our staff are watchful for the following signs:

- Students cease to attend, not due to exclusion
- Students do not attend, and no medical reason is given

As part of our duty of care we will:

- Ensure absence reference is cross referenced with risk assessments for children
- Ensure staff are trained on the warning signs to ensure timely and accurate victim identification

These concerns will then be recorded by the DSL and the Deputy DSL in the Safeguarding Concerns spreadsheet. They will also be discussed in the next staff meeting with all the teachers.

Children with Special Educational Needs and/or Disabilities

Children with special educational needs (SEN) and/or disabilities are statistically more susceptible to child abuse, including child-on-child abuse. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Assumptions that children with SEND, neurodiversity, additional learning needs and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these challenges.

Signs of abuse or neglect manifested by the parents or other responsible adult

places unrealistic expectations on the child i.e. demands a level of academic or physical performance of which they are not capable;

- offers conflicting or unconvincing explanation of any injuries to the child;
- appears indifferent to, or overtly rejects, the child;
- denies existence of or blames the child for the child's problems at home or at school;
- sees and describes the child as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the child's problems; or
- is isolated physically/emotionally.

Grooming

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female, of any gender identity. They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

Children may:

- be very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;
- have access to drugs and alcohol;
- go missing from home or school;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the [NSPCC](https://www.nspcc.org.uk) website for further information about grooming.

Signs of grooming and/or online abuse

A child may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit the signs listed below and if an individual exhibits some or all of these signs, it does not mean that they are a sex offender:

- Overly affectionate behaviour with a child;
- Affording special attention or preferential treatment to a child;
- Excessive time spent alone with a child outside of the classroom/school;
- Frequently spending time with a child in private or isolated areas;
- Transporting a child to or from the school;
- Making friends with a child's parents and visiting their home;
- Acting as a particular child's confidante;
- Giving small gifts, money, toys, cards, letters to a child;
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child; and/or
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child.

Modus operandi of institutional grooming

Target susceptible victim: Perpetrators target victims who are susceptible, isolated, and insecure and/or have greater emotional needs.

Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy.

Gain the trust of others: Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.

Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.

Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.

Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.

Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

Signs of grooming for radicalisation

There are no known definitive indicators that a young person is susceptible to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement;
- Being in possession of extremist literature;
- Poverty;
- Social exclusion;
- Traumatic events;
- Global or national events;
- Religious conversion;
- Change in behaviour;
- Extremist influences;
- Conflict with family over lifestyle;
- Confused identity;
- Victim or witness to race or hate crimes; and
- Rejection by peers, family, social groups.

Child Criminal Exploitation - County Lines: This is more difficult to spot in an online school

A geographically widespread form of harm that is a typical feature of county lines criminal activity is the criminal exploitation of children and young people. This is usually through engaging them into gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market and seaside towns. All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime.

These can include increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing; or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff are trained in CCE/County Lines.

More information can be found in KCSIE (2026), in the Home Office's 'Preventing youth violence and gang Involvement' and its 'Criminal exploitation of children and susceptible adults: county lines Guidance'. 46,000. Children as young as six are being forced to carry and sell drugs far away from their homes. They are made to skip school, sleep in drug dens, keep secrets from their loved ones. They are treated as criminals when they often feel trapped in **a hopeless situation**.

Serious Violence and Criminal Exploitation

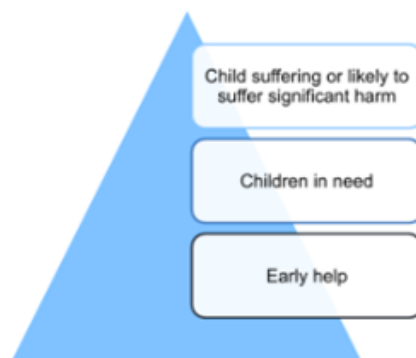
Staff should be aware of indicators associated with serious violence and criminal exploitation. These may include:

- increased absence from education;
- unexplained injuries;
- changes in friendships or relationships with older individuals or groups;
- possession of weapons;
- gang association;
- involvement in criminal activity;
- unexplained gifts, money or possessions

5. Stages of child protection

The school can use a range of arrangements, depending on the information available. The school will always work cooperatively with external agencies, including the local authority and the police.

The diagram opposite outlines the hierarchy of these approaches.



Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately by the DSL, who should follow the local authority's referral process. If the DSL is not available then there should be no delay in the school making a referral.

Early Help (also referred to as Family Help where applicable within local safeguarding arrangements)

If early help is appropriate, the DSL or DDSL will generally lead on liaising with other agencies within the Local Authority where the child is residing, and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to the Local Authority Children's Social Care, in the area where they are residing, for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child; and/or
- has already identified as being LGBT+ or is beginning to identify as LGBT+. and or

- Is questioning their gender and may be experiencing bullying, isolation, discrimination, emotional distress or mental health difficulties.

Staff should be aware that children who are questioning their gender may experience bullying, isolation or mental health difficulties and should be supported in accordance with safeguarding procedures, the child's individual needs and current statutory guidance.

Children in Need

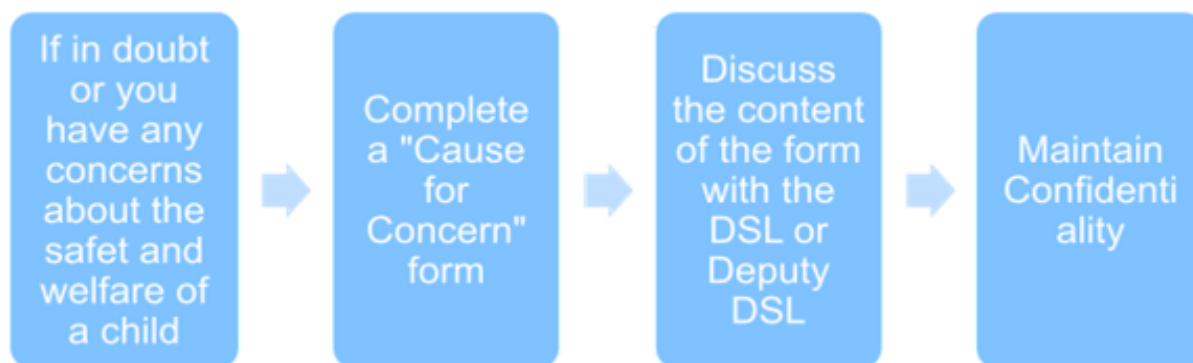
A Child in Need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child who is deemed to be a Child in Need will have been assessed by Children's Social Care under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation. Should an investigation occur, then the school's involvement and any action may be determined on the advice given by the investigating agency.

What to do if you have a concern about a child

This should be read alongside KCSIE 2026 (statutory guidance) – Part One and Annex A.



Safeguarding and promoting the welfare of children is everyone's responsibility (KCSIE 2026). All staff should know what to do when a child discloses abuse to them, they have concerns about a child's welfare, or when children or staff raise concerns about a pupil to them.

If a child tells a member of staff that they know about or have been a victim of abuse or neglect the member of staff should:

- Listen carefully and allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing". Questioning of the child about what they are saying should not be extensive, as partner agencies will lead any investigation. However, a context around what the child has said should always be sought prior to any referral being made to partner agencies within the Local Authority where the child is residing. This should be done by the DSL or DDSL, depending on who obtained the initial disclosure i.e. if a member of teaching staff receives a disclosure or has a concern, the DSL should then also speak to the child, either to corroborate the child's account or to gain further context. Limit questioning to the minimum necessary for clarification using What, When, How and Where, but avoid leading questions such as, "Has this happened to your siblings?" Do not use questions beginning with Why as this can apportion feelings of guilt within a child.
- If the child discloses abuse, it is appropriate to ask whether any other adults were present and observed the abuse and whether the abuse has happened before.
- At an appropriate time, tell the child that the matter will be referred to in confidence, always using language that is appropriate to the age and stage of development of the child, allowing for their individual need.
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.

If there is a evidence of abuse, suspicion of abuse, or disclosure (direct or indirect), we will respond to it by:

- Referral to the DSL as soon as possible to the Local Authority where the child is residing.
- The DSL should hold an initial review meeting with appropriate school staff.
- There should be interviews with the children involved (if appropriate, seek advice).
- Parents of each child should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at greater risk of harm and jeopardise any police/social care investigation; and
- At any point in the process, if there is a concern that a child has been harmed or is at risk of harm, a referral should be made to Social Services/the local authority in which the child lives/or the Police immediately.
- Having clear and robust safeguarding procedures in place for responding to abuse (including Child on Child abuse in the Child on Child Abuse Policy.)
- Providing support and training for all staff on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sharing nudes and semi-nudes, sexual abuse and sexual exploitation.
- Making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole, into account.
- Reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

Recording

In the case of a disclosure being made or an attempt to disclose by a child during a lesson, it is imperative that we ask if the child would prefer to speak 'privately'. Due to the nature of our online school and the recording of all lessons it is important the child is moved to the breakout room, this provides confidentiality and safety for a child to disclose. The building of trust and safety is crucial to a disclosure. Staff should then follow procedure for taking a disclosure and immediately write all details in the online platform Athena, which reports all notifications to the DSL. Staff should make a written digital record of the conversation with the child as soon as possible after the conversation, using a 'Cause for Concern Form' on Athena. Staff should use the specific words that the child used (e.g. if referring to parts of their body), indicating these by using "speech marks/inverted commas". A body map is advised to show an area of harm. Do not ask the child to show you.

Any concerns should immediately be brought to the attention of the Safeguarding Lead or the Deputy Safeguarding lead. Allegations of child abuse must take top priority and be referred immediately to the above mentioned.

The Safeguarding Lead or the Deputy Safeguarding lead, alongside the Head of Technology, will then arrange for the following files to be obtained from the Google Classroom Environment.

Any documents, email or files including chat transcripts, Lesson recording, Email Records, Digital Notebooks etc should only be shared with the DSL and through a secure platform, these should not be shared via email.

Parents will be contacted should there be an incident. Any allegations of child abuse will be immediately be reported to the parents within 24 hours, once an assessment of risk has been made. Our staff must be mindful that an innocent action can be misinterpreted, and staff must take steps to protect themselves from any allegations. For the protection of the staff and students all lessons are recorded and stored electronically. These recordings will be used during any investigation.

Making referrals to statutory agencies if a child is thought to be at risk of harm

When a child is thought to be at risk of harm or is likely to be at risk of harm (see above), a referral should be made immediately to Children's Social Care of the Local Authority where the child is residing, or the police if a criminal act is thought to have occurred. Whilst it is the role of the DSL, any member of staff can make a referral to Children's Social Care or the police and there should be no delay.

The school does not require parental consent for referrals to be made to statutory agencies within the location that the child is residing. Consent to do this must not be obtained from the parents if to gain consent would put the child's safety at risk or to do so could jeopardise any investigation by partner agencies (WTSC 2018).

Whilst the above procedures are clear in the UK. They are certainly unclear in areas of the world where there is less of a culture of safeguarding. We have taken advice from the International <https://www.coe.int/en/web/children/strategy-for-the-rights-of-the-child> (2022-2027)

Reporting abuse of children in their community

Abuse arising within the community may not be due to your organisation's programmes or operations. However, your organisation still has a responsibility to report on suspected or actual child abuse taking place. This should be reported to the formal local authorities or, where they are weak or corrupt, to organisations that are able to deal with cases appropriately. The reporting process will need to be decided at a local level and advice and guidance must be sought to ensure that children and their families are not put at further risk or made susceptible by the very action of reporting harm and/or abuse. There must be a degree of cultural consciousness and sensitivity shown when discussing next steps regarding families who are based internationally to ensure that the child will not be placed in additional danger if the authorities are contacted. The highest priority will always be the welfare of the child.

Sophia High uses the Child Helpline International database if we need to reach out to international agencies if we have major safeguarding concerns involving our international students. As a global network Child Helpline International shares research/data, knowledge and experiences to enhance the quality of response to children and young people in need of protection, support and guidance and to advocate for their rights.

<https://childhelplineinternational.org/helplines/>

According to our Student Register, our research has indicated we can get help from:

UAE (Dubai and Abu Dhabi)

You can report child abuse to MoI through the hotline number 116111 or through the [MoI's Child Protection Centre's website](#) and the 'Hemayati' (Arabic for protect me) app (available on [Android](#) and [iOS](#)).

Other channels:

<https://u.ae/en/information-and-services/justice-safety-and-the-law/children-safety/report-child-abuse>

Involvement of outside agencies:

UAE

Dubai Foundation for Women and Children (DFWAC). This is the first licensed non-profit shelter in the UAE for women and children who are victims of domestic violence, child abuse and human trafficking. It was established in July 2007 by His Highness Sheikh Mohammed bin Rashid Al Maktoum, Vice President and Prime Minister of the UAE and Ruler of Dubai, to offer victims immediate protection and support services in accordance with international human rights obligations. The Foundation provides a helpline, emergency shelter, and support services to women and children victims. DFWAC aims to protect physically, sexually and emotionally abused women and children, prevent ongoing abuse and the escalation of violence and promote social awareness through education and outreach.

DFWAC provides:

- A safe shelter
- Case management
- Medical care
- Psychological support
- Legal, consular and immigration assistance
- Helpline 800 111 or email help@dfwac.ae
- Website – www.dfwac.ae

Dubai Police Human Rights Department 24/7 Duty Officer 056 6862121 Latifa Hospital Child Welfare Unit
Tel: 04 2193000

Fax: 04 3241717

PO Box 4115 Dubai, UAE Working Hours: 24 Hours

Community Development Authority (Centre)

Any child in Dubai who needs help, protection from abuse, or advice can pick up the phone and dial 800-988 any time. Four social workers and psychologists at the Child Protection Centre in Al Barsha are on standby to assist residents under 18 years of age to ensure their rights are protected and upheld.

The recently opened centre under the Community Development Authority (CDA) is part of CDA's comprehensive strategy to make Dubai the most secure and ideal environment for children to live. It is tasked with rehabilitating, providing counselling, visiting and assisting children in need. Al Ameen

Reporting (Dubai & Federal Police) The Al Ameen Service officially launched in September 2003. Using this service, the people of Dubai can communicate confidentially with the authorities to keep abreast of developments in Dubai, and on issues that concern them. www.alameen.ae/en

Saudi Arabia

Protecting children from violence: <https://www.my.gov.sa/wps/portal/snp/careaboutyou/childrights>

Europe/ including Portugal, Ukraine, Spain, Italy,

The Council of Europe Strategy for the Rights of the Child (2016-2021) calls on States to uphold the human rights of children by protecting them from all forms of violence and discrimination, respecting their right to education and encouraging child participation

<https://rm.coe.int/090000168098c6cf>

Maldives:

<https://www.unicef.org/maldives/what-we-do/child-protection>

<https://www.unicef.org/maldives/press-releases/launching-1412-call-centre-ahan-mobile-application-report-violence-against-children>

USA

U.S. Department of Health & Human Services

<https://www.childwelfare.gov/topics/preventing/overview/federal-agencies/>

If a child has unmet needs

When a child is not considered at risk of harm, but still has unmet needs that could mean that they are a Child in Need (see above), a referral should be made to Children's Social Care via the local authority process in the area where the child is residing. The school does not require parental consent for referrals to be made to statutory agencies in these circumstances, however, it is best practice that these concerns should be discussed with the parents and any subsequent referral made transparently with the parent's knowledge.

Brazil

<https://childhelplineinternational.org/brazil-safernet-brasil/>

Across Europe

List of Child Protection Helplines across European countries:

<https://assembly.coe.int/LifeRay/SOC/Pdf/DocsAndDecs/2020/AS-SOC-CHD-INF-2020-02-BIL.pdf>

International Child Helplines

<https://childhelplineinternational.org/helplines/>

Confidentiality

Staff should never guarantee confidentiality to pupils/students or adults wishing to tell them about something serious, as this may ultimately not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure their safety.

Passing on safeguarding records when a child leaves the school

Information sharing is vital in identifying and tackling all forms of abuse. When a child leaves the school, it is the responsibility of the DSL/Admissions Team to ensure that a copy of their safeguarding records is transferred securely and confidentially to the new school. Before transferring, the DSL/Admissions Team will arrange a telephone call with the receiving school.

Following the conversation, they will arrange for the secure transfer of documentation. Confirmation of the receipt of the documentation should be retained with safeguarding records. A safeguarding record must be transferred separately from the main pupil file.

Whilst data protection legislation places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure; this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

The DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving, for example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

6. Online Learning and Visitor Access

Attendance of Visitors and Prospective Students in Live Lessons

Where prospective students, parents, external professionals, visitors, or other non-enrolled individuals are invited to attend or observe a live lesson, the relevant teaching staff and the Designated Safeguarding Lead (DSL) must be notified in advance and provided with sufficient information to verify attendance and manage any safeguarding concerns that may arise.

Attendance by non-enrolled individuals is subject to the school's **Visitor Attendance in Live Lessons Risk Assessment**. Where appropriate, the DSL will ensure that any identified safeguarding, privacy, security, supervision, or online safety control measures are communicated to relevant staff before attendance takes place.

Teachers should verify the identity of any individual requesting access to a lesson before admitting them.

If an unknown attendee appears in a waiting room or requests access unexpectedly, staff must:

- Not admit the attendee immediately.
- Check whether the attendee has been pre-approved through the visitor notification process.
- Contact the DSL or safeguarding team if there is any uncertainty regarding the attendee's identity or authorisation.
- Admit the attendee only once their identity and authorisation have been confirmed.
- Record and report any safeguarding concerns in line with the school's safeguarding procedures.

Prospective students, parents, and visitors may occasionally attempt to join a session before its advertised start time. Early access requests should not automatically be treated as suspicious; however, identity and authorisation must still be verified before admission.

Safeguarding considerations must be balanced with the need to protect the security, privacy, and integrity of live teaching environments. Safeguarding is everyone's responsibility, and all staff must follow the Visitor Attendance in Live Lessons Risk Assessment and associated safeguarding procedures when managing access to online lessons.

7 . Whistleblowing

The School has a published Whistleblowing Policy on the website. All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil/s or student/s. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk, they should:

Report any concern to the Chair of the Board/ Co-Founder / CEO

If the concern relates to the CEO, they should: Report the concern to the Executive Director

Concerns raised under this Whistleblowing Policy are distinct from concerns or allegations about an adult's suitability to work with or have access to children.

No member of staff will suffer a detriment or be sanctioned for raising a genuine concern about unsafe practice, provided that they do so in good faith and follow the whistleblowing procedures.

Where an adult feels unable to raise a concern about poor safeguarding practice within Sophia through the above options or where they feel that their concern is not being addressed, they can raise their concern externally using either of the routes below:

Government guidance can be found [here](#).

The [NSPCC whistleblowing helpline](#) is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – lines are available from 8:00am to 8:00pm, Monday to Friday, or email: help@nspcc.org.uk

Safeguarding Concerns and External Reporting

Staff should feel able to raise concerns about poor or unsafe safeguarding practice and potential failures in the school's safeguarding systems.

Where staff feel unable to raise concerns internally, or where concerns have not been addressed appropriately, they may contact:

NSPCC Whistleblowing Advice Line

0800 028 0285

help@nspcc.org.uk

Staff may also contact the Local Authority Designated Officer (LADO), Children's Social Care, the Police or the Information Commissioner's Office where appropriate.

8. The role of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is the senior member of staff responsible for leading safeguarding in the school (including online safety). The DSL takes the lead responsibility for safeguarding and child protection in the school and their job description explicitly reflects this.

Deputy DSL - Wellbeing / Deputy DSL / EDDSL

The school can appoint a number of Deputy DSLs. Their role is to support the DSL in their safeguarding role. Whilst the activities of the DSL can be delegated to DDSLs, the ultimate lead responsibility for child protection must remain with the DSL, and this lead responsibility must not be delegated. The Deputy DSLs are trained to the same level as the DSL and their duties of the Deputy DSLs are reflected explicitly in their job descriptions.

Inter-agency working

The DSL and Deputy DSLs liaise with the local authority (the area in which the student lives) and work in partnership with other agencies in the best interests of children in the school.

SHS works with various Local Authorities and schools who commission students. We retain our Duty of Care for all students, and work closely with Agencies from each partnership. Details of Safeguarding contacts for each commission can be found in the Partnership Drive

Information Sharing

Effective safeguarding requires appropriate and timely information sharing.

Staff should be proactive in sharing safeguarding information with the Designated Safeguarding Lead (DSL) and relevant agencies where necessary to protect children.

Data protection legislation, including UK GDPR and the Data Protection Act 2018, is not a barrier to sharing information where the failure to do so may place a child at risk of harm.

Staff should always consider the safety and welfare of the child when making decisions about information sharing and seek advice from the DSL where required.

Support for DSL

The DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in Strategy Discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

There are 4 key elements to the DSL role. They will:

- Manage referrals
- Work with others
- Train
- Raise awareness

Manage referrals

The DSL is expected to:

- refer cases of suspected abuse to the child's local authority children's social care as required;
- support staff who make referrals to local authority children's social care in the area where the child is residing;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required (in collaboration with HR team); and
- refer cases where a crime may have been committed to the police as required.

Work with others

The DSL is expected to:

- liaise with the CEO to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the Executive Director, Director/Officer (in relation to allegations against adults) and the Designated Officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies in the area where the child is residing;
- Establish and maintain an online Safeguarding page in pupils digital notebooks where resources and information is stored for access by all pupils and students, and
- act as a source of support, advice and expertise for all staff.

Training

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out their role, including inter-agency working. This training must be updated at least every two years. The DSL should undertake additional Prevent awareness training to the government Prevent training that all school staff undertake.

In addition to the formal training set out above, the DSLs knowledge and skills should be refreshed via informal updates (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help (also referred to as Family Help where applicable within local safeguarding arrangements) and statutory intervention, including local criteria for action and local authority children's social care referral arrangements in the child's area of residence.;
- 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 each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able 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;

- can recognise the additional risks that children with SEND, neurodiversity, additional learning needs and disabilities face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise awareness

The DSL should:

- ensure the school's safeguarding and child protection policies are known, understood and used appropriately;
- ensure the school's Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietor regarding this;
- ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals to children's social care in the area where the child is residing, or the police about suspected abuse or neglect may be made and the role of the school in this; and
- link with the local Safeguarding Partners (near to where staff live). to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Safeguarding Files

As stated above, where children leave the school, DSLs should ensure a copy of their Safeguarding File is transferred to the new school or college as soon as possible. This file should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools should ensure key staff, such as DSLs and SENCOs, are aware as required.

In addition to the Safeguarding File, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives. This should be done with the parent's knowledge, unless to do so would place a child or parent at heightened risk.

Availability

During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. As an online school with no physical campus, the DSL (or deputy) team is not available in person but via phone and/or Google Meet or other such media is acceptable. It is the responsibility of the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities. The Chair / Co-Founder is available in person at the Sophia Head Office.

As an online school, Sophia High School recognises that safeguarding concerns may arise through digital interactions, online learning platforms, social media, gaming environments, messaging services and artificial intelligence (AI)-enabled technologies, both within and outside school systems. The School maintains a proactive approach to identifying, preventing and responding to online safeguarding risks and ensuring that students are supported to engage safely in digital environments.

Online Safety

We recognise that whilst technology often provides the platform that may facilitate harm, our digital school commitment to supporting students and families with learning effectively and safely online. Our DSL and Chief Learning Engagement Officer are responsible for overseeing online safety in school and raise awareness in the staff group accordingly, including but not limited to, child sexual exploitation, radicalisation and sexual predation. The school protects and educates the school community in their use of technology and has mechanisms to identify, intervene in, and escalate any incident, where appropriate as evidenced in our curriculum, teaching and learning and Digital Safety.

There are three main areas of risk:

Content: being exposed to illegal, inappropriate or harmful material.

Contact: being subjected to harmful online interaction with other users.

Conduct: personal online behaviour that increases the likelihood of (or causes) harm; for example, the making, sending and receiving of explicit images, or online bullying.

The School recognises that advances in artificial intelligence and digital technologies may be used to create, manipulate or distribute harmful, abusive or sexually explicit content involving children. Such behaviour will be treated as a safeguarding concern and managed in accordance with the School's safeguarding procedures.

Supervision of Breakout Rooms and Collaborative Online Learning

Breakout rooms are an integral part of the school's delivery model, enabling paired and small-group collaborative work in line with the pedagogy of the Online Learning Policy. The school's approach to safeguarding within breakout rooms **follows the principles of Keeping Children Safe in Education: supervision that is reasonable, proportionate and appropriate to the setting, rather than continuous surveillance of every pupil interaction — the same standard that applies to group work, corridors and shared spaces in a physical school.**

The following controls apply whenever breakout rooms are in use:

- The class teacher retains host control of the whole session at all times, remains present in the lesson throughout, and moves between breakout rooms on an unannounced basis, as a teacher would circulate between groups in a physical classroom.
- Breakout groups are kept deliberately small, consistent with the school's small-group model.
- Every pupil retains an immediate exit at all times: any pupil may leave a breakout room and return to the main room, or leave the lesson entirely, at any moment. Pupils learn from home, with a parent or carer contactable as set out in the Online Learning Policy.

- All pupils are taught, and sign an age-appropriate Digital Safety Agreement committing to, the expectation that they report immediately to an adult anything that makes them uncomfortable, in a breakout room or anywhere else online. The school's behaviour and anti-bullying expectations apply in breakout rooms exactly as they do in the main classroom and in a physical school.
- Concerns raised about conduct in breakout rooms — by a pupil, parent or member of staff — are followed up promptly under the school's Safeguarding and Child Protection Policy and Behaviour Policy, and grouping arrangements may be adjusted while any concern is looked into.
- Structured weekly parent contact provides a regular, reliable route through which concerns about peer interactions are surfaced and acted upon.

The school keeps this model under review as part of its annual policy cycle and its ongoing risk assessment of remote learning.

9. The role of the Digital Safeguarding Officer (EDDSL).

The Digital Safeguarding Officer (EDDSL) is an integral part of the Designated Safeguarding Team and works closely with the DSL and DDSL. He advises the Board and school community on policy and best practice to keep children safe online.

He advises and presents termly through Online Safeguarding updates during professional development for teachers, and through workshops for students and parents.

More information can be found [here](#) and in KCSIE 2026. Also see our Online Safeguarding Policy for more details.

The EDDSL also ensures that all staff who support students in Esports qualifications and competitions are certified in the British Esports Federation 'Duty to Care'.

10. Responsibilities of the proprietor

Sophia is the proprietor of the school. As proprietor, Sophia will comply with all duties under legislation and will always take into account statutory guidance, ensuring that all policies, procedures and training are effective and comply with the law at the time.

It is the responsibility of the proprietor to:

Ensure that all staff read at least Part One of KCSIE 2026; Ensure that all staff read at least Part One of Keeping Children Safe in Education. Where appropriate to their role, staff may also be required to read Annex B and any additional safeguarding guidance determined by the School. This is recorded on the Annual Declaration signed upon joining or during Induction at the beginning of every academic year.

Ensure that all staff follow the requirements of this Safeguarding and Child Protection policy

Policy and Procedure:

- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities, as set out in Part One of KCSIE 2026;
- Designate a senior board member to take leadership responsibility for safeguarding arrangements; at Sophia High School this is Melissa McBride.
- Ensure that all safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency procedures set up by the Safeguarding Partners;
- Ensure that appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;
- Ensure that each school works in line with local inter-agency procedures;
- Ensure that the Safeguarding Policy is updated annually and made available via the school website;
- Provide a Staff Code of Conduct and Acceptable Use Policy;
- Ensure that all responsibilities regarding Children absent from Education* are followed, using Children Missing Education Statutory Guidance (Sep 2025); This includes Updated guidance on school attendance, and children being absent from education for prolonged periods and/or on repeat occasions see (Sept 2025) and updated information from Keeping children Safe in education Sept 2026 regarding updated information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Instruct schools to hold more than one contact number for each child, where possible;
- Ensure that schools report to their local authority the removal of a child from the school roll in line with statutory and local authority guidance;
- Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction – this must be in line with advice from Safeguarding Partners;
- Recognise the expertise staff built by undertaking safeguarding training and managing concerns on a daily basis;
- Ensure that appropriate filters and monitoring systems are in place to keep children safe online; and;
- Ensure that children are taught about safeguarding, including online safety.
- The proprietor ensures that an annual review of safeguarding arrangements is conducted. This includes a written report which is presented to the Sophia Board
- Members of the proprietorial team working in a governance and oversight role will undertake DSL level training, induction and training.

11. Induction

At the point of Induction, new staff must be informed of the names and role of the Designated Safeguarding Lead and Deputies. Names and Roles can also be found posted in Google Classrooms within every pupils Digital Notebook.

The School has an in-depth induction and training programme in place to develop safeguarding awareness and support ongoing professional development at Sophia High School.

At induction, all staff are provided with, expected to read and receive appropriate training on:

- Keeping Children Safe in Education (KCSIE) 2026, including Part One. Staff should also be aware of the content of Part Four (Concerns and Allegations about Adults, including Low-Level Concerns) and Part Five (Child-on-Child Sexual Violence and Sexual Harassment).
- The Safeguarding and Child Protection Policy and Procedures, including Whistleblowing.
- The Staff Code of Conduct and Acceptable Use of IT Policy, including expectations regarding staff–pupil relationships and communications.
- The Digital Safety Policy, including the use of social media.
- The Online Safeguarding Policy.
- The Behaviour Policy.
- The Preventing Extremism and Radicalisation Policy.
- The Child-on-Child Abuse Policy.
- The Youth Produced Sexual Imagery Policy.

At induction, all new staff must be informed of the names and roles of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs). Details of the safeguarding team are also available within pupils' Digital Notebooks on Google Classroom.

This is recorded on the New Staff Induction record.

12. Training

Staff employed in school

Staff employed in the school will receive annual safeguarding and child protection training, usually at the commencement of the academic year. Staff will also receive regular safeguarding and child protection updates throughout the year from the DSL in order to provide them with the relevant knowledge and skills required to safeguard children effectively. These updates may include changes to statutory guidance, local safeguarding arrangements, emerging safeguarding risks and lessons learned from safeguarding practice.

Induction and Training plus ongoing CPD for staff including arrangements for dissemination of policies and policy reviews to staff and assurance processes are captured via our digital tracking assignment and approval system to ensure that new policies and updates are read, understood and being adhered to.

Third-party contractors

It is good practice for those employed as third-party contractors who work regularly in school with the opportunity for contact with pupils/students to have basic safeguarding training, at a level appropriate to their role.

Teaching about safeguarding

The school is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad and balanced curriculum. Through ongoing work with the children, we aim to build resilience so that every child knows that we are a 'telling school', and that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another.

Safeguarding is taught in the following way:

At Sophia High School we actively promote the view that children should feel able to raise any concerns that they may have. This includes when they have a concern about a friend or peer. We ensure that all children know how to raise a concern through guidance by their class teacher.

Every Google Classroom Digital Notebook contains a safeguarding slide, which students can easily access concerning safeguarding matters. These contain staff members and guidance that the children can use if they are in need of any safeguarding guidance or help.

At Sophia High School we encourage all children to have an open dialogue with their class teacher in order to discuss any issues of concern to them. Relationship issues are discussed in Holistic Horizons lessons and other informal times as items are raised by pupils.

We actively promote the view that children should feel able to raise any concerns that they may have. This includes when they have a concern about a friend or peer. We ensure that children know how to raise a concern through discussion in Holistic Horizons lessons and assemblies.

Early Years pupils/students have daily Holistic Horizons micro-lessons where we discuss emotions of self, emotions in others, friendships, and family relationships. During these lessons an emphasis is placed on feeling comfortable and safe in all situations. We teach our young learners what to say and do if they feel uncomfortable, that they can say "no" to physical contact, that specific parts of their body are private and for themselves only to view and touch, and also support their developing confidence to talk about things which make them uncomfortable with a safe adult.

Students also complete the PBL module Learning Effectively Online at the beginning of each academic year as part of our commitment to Digital Safety and Learning Effectively Online and with Disruptive Technologies.

Informing Students, Parents/Guardians and Staff About Safeguarding

At Sophia High School, we recognise our immense responsibility to safeguard the children and adults we serve from all potential harm. We are fully committed to promoting awareness around safeguarding issues as well as providing clear procedures for reporting any concerns.

When students enrol and staff join our school, they will receive thorough information detailing various types of abuse and neglect as well as clear steps for communicating worries relating to the welfare, safety or wellbeing of any member of the Sophia High community. Safeguarding policies are widely available on our school website and google classroom workspace.

We make it clear that students and parents/guardians can share any issues in confidence with our designated Safeguarding Officer via email, phone without fear of retribution. We have a Safeguarding Classroom in our Digital platform with information about the latest safeguarding advice, contact information or where students / parents can turn to for advice. Annual Safeguarding workshops are held as part of the start of year activities with all new families, staff and students being given safeguarding overviews during the induction process.

Allegations or concerns raised about any staff member, contractor or external partner's conduct will be addressed urgently as per our official policies. The safety of our students, their families and our staff remains the utmost priority at all times. With transparency, vigilance and compassion, our school will continue strengthening a culture of trust where everyone watches out for one another and feels empowered to speak out against any potential abuse to protect our community.

External Support and Advice

Students, parents/carers and staff may also find the following organisations helpful for advice, support and safeguarding information:

- **Shore Space** – support and information for young people experiencing harmful sexual behaviour, sexual abuse or exploitation: <https://shorespace.org.uk/>
- **The Children's Society – Child Sexual Exploitation Resources** – information, support and guidance regarding child sexual exploitation: <https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation>
- **Lucy Faithfull Foundation – What About Us?** – support for children and young people affected by the arrest or investigation of an adult they know: <https://www.lucyfaithfull.org.uk/what-about-us-a-new-resource-for-teenagers-impacted-by-the-arrest-of-an-adult-they-know/>

13. Online safety

The Digital Safeguarding Officer (EDDSL) is an integral part of the Safeguarding Team.

As a full time, online school that educates our students via a virtual learning environment, it is essential that children are safeguarded from potentially harmful and inappropriate online material.

As such, we have chosen Google for Education due to its exceptional track record in safety and security for schools using the platform. We work with families to raise awareness on the risks of learning online and how to safeguard students in their homes and on networks to ensure appropriate filters and appropriate monitoring systems are in place. Additional information to keep children safe online (including when they are online at home) is provided in Annex D - of 'Keeping Children Safe in Education' September 2026.

In line with Government views, we do not believe live lessons pose additional safeguarding risks and can actually bring many benefits, including improved student engagement. The following are in place to support keeping children safe when learning online during live lessons.

We:

- use neutral or plain backgrounds when teaching live online lessons
- use a safe and highly secure platform, Google for Education, for the delivery of live lessons and sessions are recorded for safeguarding purposes
- require all students to attend live lessons with their camera on (full face) and without an alternate background
- ensure appropriate privacy settings are in place
- do not allow the use of a VPN to access any SHS content. This is in the Digital Safety Agreement and associated policies.
- ensure staff understand and know how to set up and apply controls relating to pupil and student interactions, including microphones, cameras, chat functions and breakout rooms
- set up lessons with password protection and ensure passwords are kept securely and not shared through Google Classroom.
- ensure that risk assessments for online live lessons and immersive VR based lessons is in place and reviewed by the senior leadership team annually
- ensure all staff, pupils/students, parents and carers have a clear understanding of expectations around behaviour and participation -See Digital Agreements for each Key stage.
- We record and share lessons in Google Classroom

Further Guidance from the Government:

[guidance from the UK Safer Internet Centre on safe remote learning](#) which includes detailed advice on live, online teaching

the [safeguarding guidance from London grid for learning](#) (LGfL) includes platform-specific advice [SWGfL](#), using insight from the professional's helpline provides advice on cameras on or off and recording lessons

Where children are learning online at home the DfE has provided advice to support schools to do so safely: [safeguarding-and-remote-education](#).

The annual report from Ofcom gives insights into the use of digital technology by children and families aged 3 - 18. Their 2024 Report can be found here: [Ofcom 2024](#)

All staff are aware of the school's policy relating to acceptable use of ICT and expectations relating to:

Creating a safer online learning environment:

- Giving everyone the skills, knowledge and understanding to help children stay safe online, question the information they are accessing and support the development of critical thinking, Inspiring safe and responsible use of mobile technologies, to combat behaviours online which may make students susceptible, including sharing nudes and semi-nudes (youth-produced sexual imagery),
- Use of mobile & Digital technology within our digital learning environment & immersive learning
- Use of camera equipment, including smart phones,
- What steps to take if there are concerns and where to go for help
- Staff use of social media

Cyber-bullying by children, via texts, social media and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. This includes sharing nudes and semi-nudes and image exchange under threat or through coercion.

Students, staff and parents/carers are supported to understand the risks posed by:

- the CONTENT accessed by students
- their CONDUCT on-line
- and who they have CONTACT with in the digital world Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying

All staff should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use.

All staff should be familiar with the school's Online Health and Safety and Digital Safety Policy, which sets out the school's approach to online safety in further detail, as well as the school's Youth Produced Sexual Imagery Policy.

All staff should be provided with training specific to the safeguarding issues which are likely to be encountered or children are at risk of when attending an online schooling environment.

Staff should be aware that harmful attitudes and behaviours linked to misogyny, violence against women and girls (VAWG), online influencers, coercive behaviour and discriminatory beliefs may be indicators of safeguarding concerns and should be reported in line with safeguarding procedures.

Sharing Nudes and Semi-Nudes (previously referred to as 'sexting')

Some professionals and members of the public may still use the term '*sexting*'. However, safeguarding guidance now prefers the term '*sharing nudes and semi-nudes*' because the term '*sexting*' can be interpreted differently by children, young people and adults, and may refer to text-based messages rather than images or videos.

For the purposes of this policy, *sharing nudes and semi-nudes* refers to the sending, receiving, creating, possessing, sharing or posting of nude or semi-nude images, videos or live streams by children and young people under the age of 18.

The sharing of nudes and semi-nudes can occur through mobile phones, social media platforms, messaging services, gaming platforms, live-streaming applications and other online environments.

Where incidents involve children under the age of 18, schools and colleges should respond in accordance with current safeguarding guidance, including *Keeping Children Safe in Education (KCSIE)* and UK Council for Internet Safety (UKCIS) guidance on *Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People*.

Whilst the creation, possession and sharing of indecent images of children may constitute offences under the law, children should not be criminalised unnecessarily. Any incident involving the sharing of nudes or semi-nudes should be assessed on a case-by-case basis, with the welfare, safeguarding and support needs of the child at the centre of decision-making.

The sharing of nudes and semi-nudes can expose children and young people to a range of risks, including exploitation, coercion, bullying, harassment, online abuse, reputational harm and emotional distress. All concerns should be treated seriously and managed in line with the school's child protection and safeguarding procedures.

What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

'Youth produced' includes children sharing images that they, or another child, have created of themselves.

'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.

'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

What types of incidents are covered by this policy?

Yes:

A child creates and shares sexual imagery of themselves with a peer (also under the age of 18).

A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.

A child is in possession of sexual imagery created by another child.

No:

The sharing of sexual imagery of children by adults as this constitutes child sexual abuse and schools should always inform the police.

Children sharing adult pornography or exchanging sexual texts which do not contain imagery³.

Sexual imagery downloaded from the internet by a child.

Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult.

¹ For the purposes of this policy, 'child', 'youth' and 'young person' refers to anyone under the age of 18; 'adult' refers to anyone aged 18 or over

² This is in accordance with the new advice sharing nudes and semi-nudes-in schools and colleges: respond to incidents and safeguarding young people, which has been published by the UK Council for Child Internet Safety

³ All such incidents should be responded to with reference to the school's Online Safety Policy, and in line with the school's Safeguarding Policy

⁴ As above

⁵ As above

Disclosure

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training. Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in school, or any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or colleague, or inform the police directly.

Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with this policy. When an incident involving youth produced sexual imagery comes to a member of staff's attention:

The incident should be referred to the DSL and Digital Safeguarding Officer as soon as possible;
The DSL should hold an initial review meeting with appropriate school staff;
The DSL will follow the procedures and guidance set out in [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\) - GOV.UK](#) updated in March 2024 and [GD8 – Youth Produced Sexual Imagery - Guidance for Disclosure](#)

There should be interviews with the children involved (if appropriate);
Parents of each child should be informed at an early stage via a phone call to request an urgent Google Meet with the DSL, and be involved in the process unless there is good reason to believe that involving parents would put the child at greater risk of harm and jeopardise any police/social care investigation;
and
At any point in the process, if there is a concern that a child has been harmed or is at risk of harm, a referral should be made to Children's Social Care and/or the police local to the residence of the child, immediately.

Breach of Online Safety/Digital Safety Agreements – Offensive/inappropriate work found in pupil materials

In the case of offensive/inappropriate items being found on pupil materials (Jamboard, Google Classrooms etc.) by a parent or member of SHS, the following procedures are to be followed.

If a parent finds it and complains, then send a screenshot/link to the offence to the Digital Safeguarding Officer, notify the Chair of the Board (Co-Founder), and immediately then telephone the parent to say it is being dealt with as the highest priority.

1. If staff find it, send a screenshot/link to the offence to DSL/Digital Safeguarding Officer/IT immediately who will notify the Chair of the Board (Co-Founder)
2. Google Drive Searched including email /digital notebooks - Items recorded and removed.
3. Parents called by DSL to discuss the situation, actions to be taken and that there will be an email follow up to the concern.
4. IT will use the Google tools to see which email address has been used to produce the items, where the IP address shows the content was created, and create a record of the creation of the items.
5. Chair (Co-Founder) /DSL will liaise with any staff involved in the finding of the items to explore any history with students/families which may be relevant.
6. Cancel student email account and re-set. Email out details of the new account to the family.
7. Email sent to parents outlining what has happened and how to move forward.
8. Email content:

SAMPLE EMAIL; ALERT OF CONCERN

Dear NAME,

We would like to inform you that there has been an inappropriate item found amongst the digital tools that your child uses at Sophia.

Events of this nature are distressing for all involved and we wish to reassure you that we have installed the highest level of security in our system here at Sophia.

Our initial investigation shows the following details:

DETAILS FROM GOOGLE REPORT

The IP address shows that this was through XXX email account and the physical location is XXX.

I have attached the CSV file and screenshot of our initial Google security search which shows these full details.

I now broach the very difficult subject of who has created and added to these files.

You may wish to access the browser history on your computers for these dates and times to identify where these items came from. If they originated from within your household then I feel that a family discussion is needed, to discuss how these items came to be added to xx's Sophia High work.

I am happy to reach out to support you with this difficult conversation, if you wish.

As part of our Learning Effectively Online unit, which we begin the year with, we discuss appropriate use of the internet, access to appropriate material online, and keeping your Sophia email account safe. As part of the digital age which we now all live in, the digital footsteps that we take are recorded in many places, and it is always possible to see where we have been browsing and what we have been downloading. It is important for us all to know and remember this.

Our IT team will continue to look into this as we seek to reassure you that no breach of Sophia online security has been made.

We have taken immediate action to cancel your email account with Sophia and a new one is being created. Details will be sent to you as soon as possible. Please join the network with the new details and create a totally new password. Please be reminded to never share your passwords or use ones that work across multiple accounts.

As part of your enrolment agreement with Sophia, you and your child signed a Digital Safety Agreement. To break this agreement does have serious consequences, and so the action we are considering taking at this time are XXXXXX.

Please do not hesitate to reach out to me to discuss what our findings are at this stage, how we will move forward, or if you have any other urgent matters at this time.

Kind regards

Follow up with a call with parents to check they understand the issue, the findings of the digital report, what actions have been taken by Sophia and what further actions will be taken as they have broken the Digital Safety Agreement. Any further follow up must be recorded and sent to the Board.

14. Private fostering

1. *What is private fostering?*

Private fostering is when a child or young person under 16 years old (or 18 if they have a disability) is looked after for 28 days or more by someone who is not a close relative, legal guardian or person with parental responsibility.

Close relatives only include parents, step- parents, aunts, uncles and grandparents. It is not private fostering if the child is 'looked after' by the Local Authority (also known as 'in care' and which includes placement in residential care, with an approved foster carer or a 'kinship' carer). Private fostering occurs in all cultures, including British culture, and children may be privately fostered at any age.

Examples of private fostering situations include:

children and young people living apart from their families for a variety of reasons

e.g. a parent is ill, has had to temporarily move for work or there has been conflict, separation or divorce;

- children whose parents work or study elsewhere in the UK or overseas;
- children sent to this country by their parents for education and health care;
- young people living with the family of a boyfriend or girlfriend; and
- children on holiday exchanges.

People become private foster carers for all sorts of reasons. Private foster carers can be a family friend, or someone who is willing to care for the child of a family they do not know, for example host families supplied by a Guardianship Organisation. If a host family is going to be caring for a child for 28 days or longer, they are classed as private foster carers and the Local Authority where the child lives must be notified.

Why does your Local Authority Children's Services need to know?

By law, the Local Authority must be informed about all private fostering situations. The child's parents, private foster carers and anyone else involved in the arrangement or who becomes aware of the arrangement, e.g. guardianship agencies, schools or health professionals are legally required to inform Children's Services.

Children's Services have a legal duty to make sure all private fostering arrangements are safe for the child. Once informed of the arrangement, they will check the suitability of private foster carers, make regular visits to the child and ensure advice, help and support is available when needed. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, s/he should raise this with the DSL. Where Children's Social Care are not already aware of the circumstances, the DSL should make a referral to them.

Timescales for informing the Local Authority

The child is not yet living with the private foster carers	Within 6 weeks beforehand
The child will move in with the private foster carers within 6 weeks	Immediately
The child is already living with the private foster carers	Immediately

15. Looked After Children

A child who is being 'looked after' by their Local Authority is usually known as a 'Child in Care' or a 'Looked After Child'. They might be living with foster parents or at home with their parents under an Interim Care Order granted to social care, or in residential children's homes, or other residential settings like schools or secure units.

⁶ Section 67(1) of the Children Act 1989 amended by the children Act 2004) and the Children (Private Arrangements for Fostering) Regulations 2005

A child who is adopted is not a Looked after Child. Occasionally, children are placed into Local Authority foster care under an Interim Care Order when an adoption breaks down and the adoptive parents relinquish the child. Once a Full Care Order is agreed, the child remains in long term foster care. The adoptive parents may or may not have continued contact with the child, depending on the situation and the emotional impact on the child.

An Interim Care Order will remain in place until care proceedings are concluded (within 26 weeks in most authorities). At the conclusion of care proceedings in any situation, the child will either stay in long term foster care (under a Full Care Order) until they reach the age of 18 years, return to their parents (usually under a Supervision Order), reside with other family members/friends (usually under a Special Guardianship Order), or in some cases be adopted. In all of the latter situations, it is most usual for parents to have agreed contact arrangements with their child, most commonly three times per year.

A child may also have been placed in care voluntarily by their parents who are struggling to manage their children's behaviour, or meet their child's needs due to their own illnesses or disabilities (under section 20, Children Act 1989). In these cases, rehabilitation will always be the aim, but if this is not possible, the Local Authority (local to the residence of the child), will apply for an Interim Care Order and finally a Full Care Order. Usually, these parents will have continued contact with their child.

As a result of their experiences both before and during care, Looked After Children are at greater risk than their peers; they are, for example, four times more likely than their peers to have a mental health difficulty. Providing a secure, caring environment and enabling such children to develop strong, trusting and stable relationships with professionals is critical to their safety and wellbeing.

Sophia ensures that staff receive training on Looked After Children, including on the reasons children become looked after, their legal status, the support that staff can provide to keep such children safe and the ways in which they can maximise educational stability for Looked After Children.

The Chair/Co-Founder, in collaboration with the DSL, (a) is responsible for ensuring that any looked after children are adequately supported by staff in school; (b) has contact details of the child's social worker; (c) ensures that relevant staff members have sufficient information about the child's looked after legal status and care arrangements; (d) works with the DSL to discuss how staff can best support the progress of Looked After Children in the school and meet the needs in the child's Personal Education Plan; and (e) attends Looked After Children reviews and other meetings they are required to attend.

16. Host families

When might this happen?

Schools often make arrangements for children to take part in exchange visits, either to other parts of the UK or abroad. Exchanges can benefit learning across a range of subjects. In particular, foreign visits can enrich the language's curriculum and provide exciting opportunities for pupils/students to develop their confidence and expertise in the use of other languages. Whilst Sophia High School does not yet have a program of overseas visits or residential educational trips, the following process will be followed;

What is the responsibility of the school?

Schools have a duty to safeguard and promote children's welfare as outlined in this policy. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school arranges, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

Suitability of adults in UK host families for homestay arranged by the school

When arranging a homestay, schools should consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

In circumstances where a school arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related (including where a person has parental responsibility for the visiting child), the responsible adults will be engaging in 'regulated activity' for the period of the stay. In such cases and where the school has the power to terminate such a homestay, the school or college would be the regulated activity provider.

A regulated activity provider commits a criminal offence if it knows, or has reason to believe that, an individual is barred by the Disclosure and Barring Service (DBS) from engaging in regulated activity but allows that individual to carry out any form of regulated activity.

Private arrangements

Where the child's parent(s) or a student arranges their own homestay themselves, this would be a private arrangement, therefore the school or college would not be the regulated activity provider. Where it is a private arrangement, the school is not entitled to obtain a standard or enhanced DBS check.

Background checking for adults in homestay arrangements

When a school arranges a homestay, it should consider what intelligence/information will best inform its assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. It will be for the school or college to use their professional judgement to decide what it considers will be most relevant.

However, to help inform that assessment, schools and colleges should obtain, as a minimum, a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed, it will also allow the school or college to consider, alongside all other intelligence that it has obtained, whether the adult would be a suitable host for a child.

Volunteer DBS check

DBS enhanced certificates with barred list information for volunteer roles can be obtained free of charge. In respect of an adult who provides UK homestay and receives no remuneration in respect of the stay or where schools reimburse families only for expenses incurred, to enable a DBS application to be considered as a volunteer role, the 'Position Applied For' field will need to make clear that the position is unpaid.

In addition to those engaging in regulated activity, schools are free to decide whether they consider it necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

Suitability of adults in host families abroad

It is not possible for schools and colleges to obtain criminal information from the DBS about adults who provide homestays abroad. Schools should liaise with partner schools abroad, to establish a shared understanding of, and agreement to, the arrangements in place for the visit. They should use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents should be aware of the agreed arrangement. Schools are free to decide whether they consider it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK.

The school should produce a written risk assessment outlining the approach taken and indicating the reasons for specific decisions.

During the visit

Pupils/students should understand who to contact during a homestay should an emergency occur or a situation arise which makes them feel uncomfortable.

Additional action for extended homestays

Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to Private Fostering under the Children Act 1989. In these cases, the school should notify the local authority of the arrangements. Private fostering legislation places a duty on local authorities to satisfy themselves that the welfare of a child who is

being, or proposed to be, privately fostered in their area is being or will be satisfactorily safeguarded and promoted. By notifying the local authority, the school and college will be assisting the local authority in discharging its duty. See section on Private Fostering.

17. Child-on-child abuse

For further information look at this see our child-on-child Policy.

All staff should be alert to the risk of child-on-child abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh', and should not develop high thresholds before taking action. Abuse is abuse and child-on-child abuse should be taken as seriously as abuse by adults.

What is child-on-child abuse?

For these purposes, child-on-child abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms, including, but not limited to, serious bullying (including cyber-bullying)⁷, relationship abuse⁸, domestic violence⁹, child sexual exploitation¹⁰, youth and serious youth violence¹¹, 'upskirting' (see below), harmful sexual behaviour¹² (see below) and gender-based violence¹³.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to with reference to the school's policy and in accordance with this policy (see above).

⁷ Please see the school's Anti-Bullying Policy.

⁸ <https://educationinspection.blog.gov.uk/2019/10/04/what-is-peer-on-peer-abuse/>

⁹ This type of abuse relates to abuse between children aged 16 and 17 who are or have been intimate partners or family members. The abuse includes but is not limited to psychological, physical, sexual, financial and emotional.

¹⁰ This is a form of sexual abuse where children are sexually exploited for money, power or status. This abuse can be perpetrated by other children or by adults. It can involve violent, humiliating and degrading sexual assaults. In some cases, children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

¹¹ Serious youth violence is any of the most serious offences where the victim is aged 19 or below, including murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. Youth violence also includes assault with injury offences.

¹² This is any sexual behaviour by a child or young person which is outside of developmentally "normative" parameters. This can (but does not always) include abusive behaviour such as sexual assaults.

¹³ This is violence that is directed against one gender as a result of their gender.

What role does gender play?

Children of all gender identities can both perpetrate and be the victim of child-on-child abuse, but this often manifests itself differently; girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the school's Anti-Bullying Policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include:

- where it is repeated over time and/or where the perpetrator intended to cause serious harm;
- where there is an element of coercion or pre planning; and
- where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

This list is not exhaustive and staff should always use their professional judgement and discuss any concerns with the DSL.

How can I identify victims of child-on-child abuse?

Identifying child-on-child abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from child-on-child abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document.

Signs can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect.
- physical injuries.
- having difficulties with mental health and/or emotional wellbeing.
- becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much.
- drugs and/or alcohol use.
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age.

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Are some children particularly susceptible to abusing or being abused by their peers?

Any child can be affected by child-on-child abuse and staff should be alert to signs of such abuse amongst all children.

Research suggests that:

- Child-on-child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.
- Children who are particularly susceptible to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.
- Children with SEN/D and those who identify as LGBT+ are particularly susceptible to both abuse and child-on-child abuse.

How prevalent is child-on-child abuse?

Recent research suggests that child-on-child abuse is one of the most common forms of abuse affecting children in the UK. For example, more than four in ten teenage schoolgirls aged between 13 and 17 in England have experienced sexual coercion (Barter et al 2015). Two thirds of contact sexual abuse experienced by children aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford et al 2011) and over a third of young boys in England admitted to watching porn and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with this policy. If a child is in immediate danger, or at risk of harm, a referral to Children's Social Care in the area where the child is residing and/or the police should be made immediately.

How will the DSL respond to concerns of child-on-child abuse?

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other child. Where the DSL considers or suspects that the behaviour might constitute abuse, Children's Social Care (local to the residence of the child), will be contacted immediately and, in any event, within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with Children's Social Care and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services.

Any response should be decided in conjunction with Children's Social Care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;

- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of child-on-child abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting;
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the school. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the school;
- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in this Safeguarding Policy (including where the child is in need of early help (also referred to as Family Help where applicable within local safeguarding arrangements) or statutory intervention); (e) monitoring the child's well being closely and ensuring that s/he receives on-going support from all relevant staff members within the school; (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term; and
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

How does the school raise awareness of, and reduce the risk, of child-on-child abuse?

Staff are trained on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. The school actively seeks to prevent all forms of child-on-child abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child-on-child abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Children are educated about the nature and prevalence of child-on-child abuse via PSHE lessons and form times. They are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy

towards all forms of bullying and child-on-child abuse.

18. Sexual Violence and Sexual Harassment between children

Child-on-child abuse can include two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with, the school's wider approach to child-on-child abuse (see above).

Sexual Violence includes sexual offences which fall under the Sexual Offences Act 2003.

Sexual Harassment refers to 'unwanted conduct of a sexual nature'. This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including but not limited to making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group;
- be perpetrated by a child of any age against a child of any age;
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation;
- include behaviours that exist on an often progressive continuum and may overlap; and/or
- be online and offline (physical or verbal).

The advice from the Department for Education on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2017 – Updated 2021) has now been replaced and incorporated into the KCSIE 2026. This provides information about what sexual violence and sexual harassment is, how to minimise the risk of it occurring, and what to do when incidents occur, or are alleged to have occurred.

The DfE advice highlights best practice and cross-references other advice, statutory guidance and the legal framework. The school will apply the principles set out in it when considering their approach to sexual violence and sexual harassment between children.

Key Points: The above guidance

- stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up
- highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, and encourages early intervention to avoid potential escalation;
- advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum;
- encourages forums that enable children to talk about issues openly;
- includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;
- advises on how to manage a disclosure, either from the child who has suffered abuse or from other children;
- provides guidance on when to carry out a risk and needs assessment for children affected by sexual violence or sexual harassment;

- provides guidance on initial considerations which schools should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the children, and any power imbalance between them; and
- provides guidance on difficult scenarios which schools might encounter, for example, how to handle an incident between two pupils/students which is alleged to have taken place away from school premises.

For greater detail read KCSIE 2026 Part five: Child-on-child sexual violence and sexual harassment.

19. Signposting to Further Information

Keeping Children Safe in Education 2026 contains further guidance on a range of specific safeguarding issues and should be used alongside this policy and other relevant school safeguarding procedures.

Any person who has a concern about a child within the school must follow the procedures outlined within this document.

If staff have any concerns about a child's welfare, they should act immediately. Where a child is suffering, or is likely to suffer, significant harm, a referral to Children's Social Care in the area where the child resides (and, where appropriate, the police) should be made without delay.

Staff should be familiar with safeguarding guidance relating to a range of specific safeguarding issues, including:

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County Lines
- Children in the court system
- Children missing from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern slavery and the National Referral Mechanism
- Preventing radicalisation
- The Prevent Duty
- Channel
- Child-on-child sexual violence and sexual harassment
- Serious violence
- Honour-based abuse
- Female Genital Mutilation (FGM) and mandatory reporting duties
- Forced marriage

- Online safety, including AI-enabled harms and digitally manipulated content
- Additional sources of advice and support

Staff should refer to Keeping Children Safe in Education 2026 and other relevant statutory guidance for further information on these safeguarding issues.

All staff at Sophia have training in the following:

- Child Criminal Exploitation / County Lines
- Vicarious Trauma
- Adverse Childhood Experiences
- Signs of Safety and Wellbeing Framework
- Domestic Abuse
- Neglect
- Youth Suicide Prevention
- QPR Gatekeeping
- Trauma Informed Practice
- Speaking to Children About Sexual Abuse

20. Low level concerns

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or CEO of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and visitor, unless otherwise stated. The school is conscious of its duty of care to pupils/students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting.

The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves, is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils/students for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct including Acceptable Use Policy'. Staff should always avoid behaviour which might be misinterpreted by others.

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals.

There is potential for exploitation and harm of susceptible young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

The overarching aim of the school's Low Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

What is a low-level concern, including those that are self-reports?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the school's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

A self-report also falls under our Low-Level Concerns Policy and can be as described above. Where a staff member wishes to work outside of their contract with Sophia, they should first seek agreement with the CEO and a written confirmation placed in their employee file.

What should I do if I have one?

Where a low-level concern (including self-reports) exists, it should be reported/emailed to the CEO as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

How will my low-level concern be handled (including self-report)?

The DSL will discuss all low-level concerns s/he receives with the Chair / Co-Founder as soon as possible and in any event within 24 hours of becoming aware of it.

The DSL will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure (outlined later in this document). The circumstances in which a low-level concern might be reclassified as an allegation are where:

- the threshold is met for an allegation (see below);

- there is a pattern of low level concerns which collectively amount to an allegation;
- there is other information which, when taken into account, leads to an allegation.
- Where the DSL is in any doubt whatsoever, advice will be sought from the Chair of the Board (Co-Founder) / Director, if necessary on a no-names basis.

Having established that the concern is low level, the DSL will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc. The person to which the low level concern relates should be informed of any concern raised about them once all risk has been identified and assessed.

What records will be kept?

Where a low level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept in a central file which logs all low level concerns and will be retained until the staff member reaches normal pension age or 10 years after if longer. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- the concern (or group of concerns) has been reclassified as an allegation as above;
- the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

21. Allegations of abuse made against teachers and other staff

The purpose of this section of the policy is to outline how allegations against adults will be handled. Allegations will always be dealt with in accordance with statutory guidance provided in KCSIE 2026.

What is an allegation?

Allegations represent situations that might indicate a person would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position, or in any capacity. This policy applies to all adults in the school if it is alleged that they have:

- 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; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

An allegation may be triggered by one specific incident or by a pattern of behaviour by the adult, or low-level concerns which when considered collectively amount to an allegation.

What should I do if I have an allegation?

Duties as an employer and an employee

This policy relates to members of staff and volunteers who are currently working in any school, regardless of whether the school is where the alleged abuse took place. Allegations against a teacher

who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Sophia High School has a duty of care to all employees. Sophia will provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation.

Dealing with an allegation

Sophia High School takes seriously all allegations made against staff who have contact with children and young people in our school community. We will investigate appropriately when information about suspicious or inappropriate behaviour is brought to our attention.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority Children's Social Care services. In these cases, local arrangements will be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by Children's Social Care services and/or the police.

Our policy is to engage with the Local Authority Designated Officer (LADO) when allegations reported to us suggest indicators of harm or possible criminal offences. The LADO acts as overseer to ensure suitable resolution and action in response to credible allegations or wider safeguarding issues implicating staff related to children and young people across local authority in which they reside.

As we are a UK Online School, we work across a number of Local Authorities in the UK. Full contact information for the LADO Team's that we work with can be found on the Partnership Drive.

As part of allegations management, we will discuss the reported staff behaviour or incident with the LADO first before taking any potential employment action like suspension or dismissal. Based on the guidance provided by the expert LADO service, our leadership team will support transparent investigation and accountability for staff conduct to prioritise the safety and trust of children, young people and families under our care.

Where allegations against staff have been made, these are the steps we will follow.

Initial discussion

The DSL will not undertake any investigation before first speaking to the Chair of the Board (Co-Founder). The DSL (or Chair where there is an allegation against the DSL) will inform the Executive Principal of all allegations that come to the school's attention and appear to meet the criteria. The DSL/Chair of the Board (Co-Founder) will jointly consult with the police, contacts within the international settings of families and Children's Social Care as appropriate.

The purpose of an initial discussion is for the DSL to consider the nature, content and context of the allegation and agree on a course of action. The Chair (Co-Founder) may ask the Designated Officer(s) to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the DSL / Chair (Co-Founder) will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the Chair (Co-Founder) should discuss the allegations with the Executive Director in order to help determine whether police involvement is necessary.

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

Inter-agency Strategy Discussion

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened by the DSL or the police in accordance with the statutory guidance *Working Together to Safeguard Children*. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police will take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where a strategy discussion is needed, or police or Children's Social Care services need to be involved, the Chair of the Board (Co-Founder)/Founder will not inform the accused person until those agencies have been consulted, and have agreed what information can be disclosed to the accused. The Chair of the Board (Co-Founder) / Founder should only inform the accused person about the allegation after consulting the DSL and actions have been decided. It is extremely important that the Chair of the Board (Co-Founder) provides the accused with as much information as possible at that time.

Where it is clear that an investigation by the police or Children's Social Care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the Chair of the Board (Co-Founder) will discuss the next steps with the Executive Director of the Board / Founder and the DSL.

In those circumstances, the options open to the school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default

position: an individual should be suspended only if there is no reasonable alternative (see guidance on suspension, below).

Internal investigations

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the Chair of the Board (Co-Founder) will discuss with the Executive Director of the Board how and by whom the investigation will be undertaken. In straightforward cases, an internal investigation will be agreed upon and should normally be undertaken by a senior member of school staff. Where necessary, due to lack of resource or the nature or complexity of the allegation, the allegation will require an independent investigator. An independent investigator will be appointed by the Chair of the Board (Co-Founder) /Founder

Where a safeguarding concern or allegation triggers another procedure, such as grievance or disciplinary, that procedure shall only be followed once the immediate safeguarding concern or allegation has been fully investigated.

Suspension of an employee

Sophia will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered prior to taking that step.

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases, this will require the Executive Director/Director/Manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. If the DSL is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the Board of Directors, Children's Social Care or the police as required. But suspension is highly unlikely to be justified on the basis of such concerns alone.

Within Sophia, suspension requires the authorisation of the Chair of the Board (Co-Founder) (Our group policy is to hold a conversation with the Executive Director + Directors of Education to reach a rounded decision about whether suspension is the correct course of action.

Suspension will be considered only in a case where there is cause to suspect a child or other children at the school are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the Chair of the Board (Co-Founder) will consider carefully whether the circumstances warrant suspension from contact with children at the school or until the allegation is resolved.

In cases where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the school or sixth form college, immediate action will be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work

The Chair of the Board (Co-Founder)/ Founder will also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the Board, police and Children's Social Care services have no objections to the member of staff continuing to work during the investigation, the Executive Director will aim to be as inventive as possible to avoid suspension.

Based on assessment of risk, the following alternatives will be considered by the Board of Directors / Chair before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the school so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The Executive Director will consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the Board of Directors including the Chair and Executive Directors (Co-Founder). This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. Sophia will make clear to the suspended employee where they can obtain support. The person will be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's Social Care services or the police cannot require the Chair of the Board (Co-Founder) to suspend a member of staff or a volunteer, although the Chair of the Board (Co-Founder) will give appropriate weight to their advice. The power to suspend is vested in Sophia as proprietor of the school.

Where a strategy discussion or initial evaluation concludes that there should be enquiries by Children's Social Care services and/or an investigation by the police, the Chair of the Board (Co-Founder) should canvass police and Children's Social Care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school consideration of

suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision will be taken on a case-by-case basis having undertaken a risk assessment.

Support for employees

Sophia has a duty of care to their employees. Sophia will act to manage and minimise the stress inherent in the allegations process. Support for the accused individual is vital to fulfilling this duty. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the Children's Social Care services or the police. The individual will be advised to contact their trade union representative, if they have one, or a colleague for support.

The Chair of the Board (Co-Founder) will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of the child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or the police or Children's Social Care services need to be involved, the Chair of the Board (Co-Founder) will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will also be kept informed of the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child will be told the outcome in confidence.

Parents and carers will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing, as set out in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, Children's Social Care services, or the police as appropriate, will consider what support the child or children involved may need.

Timescales

It is in everyone's interest to resolve cases as quickly as possible and ensure consistency with a fair and thorough investigation. All allegations will be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors, including the nature, seriousness and complexity of the allegation.

For cases where it is clear immediately that the allegation is unsubstantiated or malicious, it is aimed that they will be resolved within one week. Any concerns about safeguarding will always be discussed with the DSL who will forward concerns to the Chair of the Board (Co-Founder).

Confidentiality

When an allegation is made, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.” This means that a parent who, for example, published details of the allegation on a social networking site, would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates’ court to request that reporting restrictions be lifted).

The Board of Directors will take advice from the Chair, police and Children’s Social Care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

Oversight and monitoring

The Chair of the Board (Co-Founder) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with Safeguarding Partners on the subject. The Chair of the Board (Co-Founder) will provide advice and guidance to the Executive

Director/DirectorBoard Director, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces should also identify officers who will be responsible for:

- liaising with the Chair of the Board (Co-Founder) / DSL taking part in the strategy discussion or initial evaluation;
- subsequently reviewing the progress of those cases in which there is a police investigation; and
- sharing information on completion of the investigation or any prosecution.

If the strategy discussion or initial assessment decides that a police investigation is required, the police should also set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service (CPS) about whether to: charge the individual; continue to investigate; or close the investigation. Wherever possible, that review should take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

Information sharing

In a strategy discussion or the initial evaluation of the case, the agencies involved will share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible, the employer will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This will be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Children's Social Care services should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

Following a criminal investigation or a prosecution

The police should inform the employer and Chair of the Board (Co-Founder) immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those

circumstances, the Chair (Co-Founder) should discuss with the Board of Directors whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or Children's Social Care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to be given as to the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

Outcome of an allegation

The following definitions will be used when determining the outcome of allegation investigations:

Substantiated: there is sufficient evidence to prove the allegation;

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

False: there is sufficient evidence to disprove the allegation;

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

On conclusion of a case

There is a legal requirement for employers [Sophia] to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. If an allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, Sophia will refer the case to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of teaching staff at a school, the matter will be referred to the TRA to consider prohibiting the individual from teaching in relation to their professional misconduct.

When it is decided on the conclusion of a case that a person who has been suspended can return to work, the Executive Director/Director/Manager will consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Executive Director/Director/Manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school.

Malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the Chair of the Board (Co-Founder) will refer the matter to the Children's Social Care services to determine whether the child concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the Chair of the Board (Co-Founder) and Senior Leadership Team will consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police

should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil.

Learning lessons

At the conclusion of a case in which an allegation is substantiated, the Chair of the Board (Co-Founder) will review the circumstances of the case with the Board of Directors to determine whether there are any improvements to be made to the school or college's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The Chair (Co-Founder) and the Board of Directors will consider how future investigations of a similar nature could be carried out without suspending the individual.

Resignations and 'settlement agreements'

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with the statutory guidance KCSIE 2026. A referral to the DBS must be made if the criteria are met (see criteria in KCSIE 2026). Sophia will also consider whether a referral to the TRA is appropriate (see criteria in KCSIE 2026).

If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent the proprietor from making a DBS referral even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because the proprietor would not be complying with its legal duty to make the referral.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused will be given a full opportunity to answer the allegation and make representations about it. However, the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, will continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Record keeping

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation, if that is longer. The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention.

References

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference. See KCSIE 2026 for further information on references.

Summary of the main changes to KCSIE 2026

The following information outlines the changes and updates made to Part One and Annex B of the 2024 Keeping Children Safe in Education.

Amendment to the definition of ‘Safeguarding and promoting the Welfare of Children’

The definition of Safeguarding has been amended to reflect the changes made in Working Together to Safeguard Children. Paragraph 3 now states: “Safeguarding and promoting the welfare of children is defined for the purpose of this guidance as:

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

Early Help (also referred to as Family Help where applicable within local safeguarding arrangements)

Paragraph 18 has been amended to add that staff should be alert to the potential need for Early Help for pupils who have “experienced multiple suspensions, [are] at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit”

In Part Five where options to manage reports of child-on-child sexual violence and/or sexual harassment are discussed, paragraph 497 has been amended to include the importance of Early Help at any stage in a child’s life. It states, “Early Help is support for children of all ages that improves a family’s resilience and outcomes or reduces the chance of a problem getting worse.”

Children and the court system

In Annex B, links to two age-appropriate guides have been included to support children who are required to give evidence in court.

Preventing radicalisation

In Annex B, a disclaimer has been added to outline that this section is still under review following the new definition of extremism released on 14th March 2024. Additional information is also provided to state that possible indicators of radicalisation should be taken into consideration alongside other factors or contexts.

Wording and minor definition changes

Several wording and minor definition changes occur in KCSIE 2026, including:

- Headings have been amended across KCSIE to reflect that pupils may experience “abuse, neglect and exploitation” rather than solely “abuse and neglect”. (Paragraph 19)
- The definition of abuse has been expanded slightly to emphasise that witnessing ill treatment of others is harmful to children. The paragraph makes references to the relevance of this in all forms of domestic abuse, including where children “see, hear or experience its effects”. (Paragraph 24)
- In the section called ‘safeguarding issues’ (which outlines the awareness of safeguarding issues that staff should have), the wording about absence has been changed. The term “deliberately missing education” has been replaced with “unexplainable and/or persistent absences from education”. (Paragraph 31)

The DSL and Safeguarding Team should take lead responsibility for the above.

Staff Safeguarding and Child Protection training should include an understanding of the above.

Reiteration that schools should follow the recently published DfE publication of [Filtering and monitoring standards](#) and guidance.

Governing bodies/proprietors strategic training should include an understanding of the above and should review the above standards with IT staff and service providers.

Schools should consider meeting the [Cyber security standards](#).

The Safeguarding and Child Protection Policy, and Online Safeguarding Policy should reflect the individual schools’ approach to the above on school devices and networks.

For safer recruitment, schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates, as part of the shortlisting process. Schools should inform shortlisted candidates that online searches may be done as part of due diligence checks. Copies of documents used to verify the successful candidate’s identity, right to work and required qualifications should be kept on their personnel file

The importance of PSHE in preventative education.

The importance of the DSL's understanding and implementation of an appropriate adult when required (PACE Code C 2019).