

SAFEGUARDING & CHILD PROTECTION POLICY

BROCKWOOD PARK SCHOOL

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1 Introduction

Safeguarding and child protection are central concerns of Brockwood Park School. As a school that at its core offers a holistic approach to education, we place healthy and supportive relationships as a priority.

At Brockwood Park School, we are clear that safeguarding and promoting the welfare of children are everyone's responsibility. It is important for children to receive the right help at the right time and be able to address safeguarding risks, prevent issues from escalating and promote children's welfare. There is a zero-tolerance approach to abuse of any kind and even if there are no reported cases, staff must take the view that they can occur in our setting. We make sure that systems are in place for children to express their views and we operate with the best interests of the child at their heart. All staff are aware that children may not be ready or know how to tell someone that they are being abused, but the close and careful monitoring of each child, encourages a trusting environment where disclosures do happen. A child is more likely to tell a trusted adult that something is wrong, and a member of staff is more likely to notice quietly that something is wrong, in a community built on genuine relationship and care.

Brockwood Park School is run as a community with distinct educational purposes, inspired by the work of J. Krishnamurti. One of our central purposes is to inquire into the nature of the self and of conditioning, especially in relationships with other people. In a society where relationships are increasingly transactional, we seek to create a space where genuine human relationship is not only possible but is itself a source of learning — where disagreements, reactions and daily life itself become opportunities to understand ourselves and each other more clearly. Because of this, learning at Brockwood is not confined to the classroom or to designated times. The whole movement of daily life is part of the educational process, and many informal interactions between staff and students are an integral and valued part of it, conducted with the same care and boundaries expected everywhere else in school life. In creating an atmosphere of a home away from home, staff seek to ensure that students feel welcome, cared for and supported through shared meals, practical help, and attention to the everyday needs of living together in a close community. The quality of relationships at Brockwood is intended to be naturally similar to that of a large family, marked by mutual respect, trust and attention to one another's wellbeing.

The school is run by a management committee, currently consisting of the following four members: Kate Power, Mina Masoumian, Thomas Lehmann and Tom Power. The *School Management Committee* (SMC) is overseen and coordinated by two *Co-Chairs*: Mina Masoumian and Thomas Lehmann. The SMC fulfils the role of a Principal/Headteacher in the school. From a safeguarding perspective and for any reference made to Principal/Headteacher in the standards and *KCSIE (Keeping Children Safe in Education)*, this role is fulfilled by the Co-Chairs. One of the Co-Chairs is the DSL.

The board of Trustees have a strategic leadership responsibility for the school's safeguarding arrangements and ensure that they comply with their duties under legislation. Their objective is to facilitate a whole school approach to safeguarding which involves everyone in the

school and to ensure that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development. They aim to produce a culture that is one of safety, equality and protection for the whole school. The Co-Chairs ensure that the policies and procedures, approved by the Trustees, are understood, and followed by all staff and volunteers. The Trustees have appointed Wendy Smith, who is also the *Chair of Trustees*, and Gary Primrose as *Safeguarding Liaison Trustees for Child Protection issues*. The Chair of Trustees is responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Co-Chairs.

The Trustees undertake a full annual review of the policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. The two Liaison Trustees take a lead in this review and ensure that it is formally documented in writing and any deficiencies or weaknesses recognised in arrangements or procedures are remedied immediately and without delay. The main tool used by the Trustees for this review is reviewing the annual audit performed by the safeguarding team at the school using the Hampshire safeguarding audit tool.

This policy applies to the whole school and is publicly available on the school's website and on request. Throughout this policy "children" and "students" mean students under the age of 18, which is how Keeping Children Safe in Education uses the word; the section on students aged 18 and over sets out what differs for the students to whom that guidance does not apply. This policy applies to the School Management Committee, Trustees, all staff and volunteers working in the school.

All employees, including senior leadership members, should read this policy in conjunction with:

- Part One of Keeping Children Safe in Education (September 2026), which all staff are expected to read in full.
- The *Behaviour of Students Policy*
- The *Anti-Bullying Policy* (which includes measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying)
- The Staff Behaviour Policy (*Code of Conduct*)
- The *Safer Recruitment Policy*
- The *Taking, Storing and Using Images of Students Policy*
- The [*Teachers' Standards*](#)

This policy is written to meet the requirements set out by the Government's statutory guidance;

- [*Working Together to Safeguard Children*](#) (March 2026),
- [*Keeping Children Safe in Education \(2026\)*](#)
- [*National Minimum Standards for Boarding Schools \(May 2026\)*](#)
- [*Prevent duty guidance: for England and Wales*](#) (2023, in force from 31 December 2023)

- The Human Rights Act 1998 (HRA)
- The Equality Act 2010
- Public Sector Equality Duty
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) (July 2025, in force from 1 September 2026)
- [Generative AI: product safety expectations 2025](#)
- [Restrictive interventions, including use of reasonable force, in schools: Guidance for schools in England](#) (April 2026)
- Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and Data (Use and Access) Act 2025

This policy is also written to address the School's charity law safeguarding duty.

2 Policy aims

Our *Safeguarding and Child Protection Policy* aims to:

- To establish a safe environment in which children can learn and develop.
- To provide clear direction to staff and others about expected codes of behaviour in dealing with Safeguarding and Child Protection issues, continuing to develop awareness in all staff of the need for child protection and their responsibilities in identifying abuse, with particular care being taken with children with disabilities and SEN who are especially vulnerable. This includes online safety, understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- To ensure consistent good practice.
- To demonstrate the school's commitment with regard to safeguarding and child protection to students, parents and other partners.
- Make sure that staff are playing a vital role in preventative education, with a whole school approach that ensures a zero-tolerance approach to sexism, misogyny/misandry, homophobia, biphobia, transphobia, sexual violence and sexual harassment.
- To equip children with the skills needed to keep them safe.

3 Commitment to safeguarding

We commit to:

- Have regard to the safeguarding procedures as outlined in the DfE (Department for Education) guidance *Keeping Children Safe in Education* (September 2026) and the latest version of the document *Working Together to Safeguard Children* (March 2026).
- Carry out the required checks of staff as outlined in the guidance *Keeping Children Safe in Education* (September 2026).
- Ensure all staff and volunteers understand their duties in being alert to signs of abuse, and the procedures for referring any concerns to the *Designated Safeguarding Lead* without delay.
- Train all new staff and volunteers in Safeguarding and Child Protection as well as Online Safety matters as soon as possible upon appointment, as part of their induction.
- Ensure that all staff know that it is an offence for a person aged 18 or over, for example a member of teaching or boarding staff, to have a sexual relationship with a student under 18 where that person is in a position of trust in respect of that student, even where the relationship is consensual
- Develop effective links with the relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attending case conferences (only the Co-Chairs can give authority for the Police to be on the school site).
- Ensure *Safer Recruitment* practices are always followed.
- Ensure that all concerns or allegations of abuse are reported to the Designated Safeguarding Lead (as named in this policy), and that policy procedures are subsequently followed.
- Promote an inclusive, anti-discriminatory culture where racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.
- Keep detailed, accurate and secure written records of all safeguarding concerns, discussions, actions, decisions and outcomes, including the rationale for decisions made. Records must include instances where referrals were or were not made to another agency and the reasons for that decision. Safeguarding records will be stored securely and separately from the main student file.
- Provide immunity from retribution or disciplinary action against staff for 'whistleblowing' in good faith.
- To address the School's charity law safeguarding duty to:
 - provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers.

- set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly.
- have adequate safeguarding policies, procedures and measures to protect people.
- provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as police, local authority and the Charity Commission.
- the specific statutory obligations on the School to safeguard and promote the welfare of children, as defined below.

4 Key people responsible for child protection and safeguarding

4.1 Key safeguarding contacts at Brockwood Park School

Role/Name	Contact details
Safeguarding team	dsl@brockwood.org.uk
Designated Safeguarding Lead (DSL) Mina Masoumian	01962 771744 07445 691903
Deputy Designated Safeguarding Lead (DDSL) - Brockwood Park School Elena Maria Ciungu Kate Power	01962 771744 07925 519488 07576 777543
Co-Chairs of School Management Committee Thomas Lehmann Mina Masoumian	01962 771744
Safeguarding Liaison Trustees Wendy Smith (also Chair of Trustees) Gary Primrose	01962 771744

4.2 Key external contacts

Organisation	Contact details
Hampshire Children's Services (students under 18)	0300 555 1384 (or 08456 035620) Out of Hours contact: 0300 555 1373 childrens.services@hants.gov.uk
Children's Reception Team (CRT)	01329 225379 csprofessional@hants.gov.uk

Organisation	Contact details
Local Authority Designated Officer (LADO) service Hampshire County Council	lado@hants.gov.uk Initial enquiries: Hampshire LADO enquiry form . Referrals: Hampshire LADO notification form . Hampshire does not operate a LADO telephone line.
Independent Person Anne Greene	0797 666 7473 0208 292 3284 agreenesage@gmail.com
Police	101 (999 if an emergency)
Childline (for children and young people)	Tel: 0800 1111
NSPCC • Child Protection Helpline • Whistleblowing Helpline	help@nspcc.org.uk (11am to 4pm daily) 0808 800 5000 (10am to 4pm Monday to Friday) 0800 028 0285
Children's Commissioner for England Dame Rachel de Souza	08005280731 help.team@childrenscommissioner.gov.uk
Prevent referral about a student	National Prevent Referral Form , submitted to the police. Prevent advice line 0800 011 3764. Police 101, or 999 where there is an immediate risk.
Extremism within the school, including a concern about the school itself or a member of staff	DfE, Report Extremism in Education service. Counter-Extremism Helpline 020 7340 7264, counter.extremism@education.gov.uk
Education Support Helpline	08000 562 561
Hampshire Adult Social Care (students aged 18 and over)	0300 555 1386 Out of hours: 0300 555 1373 Professional referral form on the Hampshire County Council website

4.3 The role of the Designated Safeguarding Lead (DSL)

The DSL is Mina Masoumian. She is one of the Co-Chairs of the School Management Committee. She works closely with the members of the SMC who cover the main areas of the school (Pastoral, Curriculum, SENCO), and together with the other Co-Chair, they fulfil any safeguarding reference made to Principal/Headteacher under standards and KCSIE 2026. We are a small unique school with staff members having multiple roles and responsibilities including senior staff members in the SMC.

The DSL is the first point of contact for parents, students, teaching and support staff, external agencies and any other parties in all matters of safeguarding and child protection (except in the cases of an allegation against the DSL and the other Co-Chair where processes as outlined in this policy should be followed) and to provide support, advice and expertise on all matters concerning safeguarding.

The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

The DSL also takes the lead responsibility for [*Prevent*](#) and oversees this in the school to ensure prevention of radicalisation, extremism and being drawn into terrorism.

The DSL will encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

The DSL has regular meetings with SENCOs, the Pastoral Team and the School Management Committee to help promote students' educational outcomes through sharing relevant information about their welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experience.

It is the responsibility of the DSL (and the deputies) to be available to discuss any safeguarding concerns and to arrange adequate and appropriate cover arrangements for any out-of-hours or out-of-term activities to ensure that off-site activities (for example local, national or international trips and excursions) have appropriate safeguarding support and access to the DSL or a DDSL, by telephone or video call, where the DSL or a DDSL is not on the trip.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL; this lead responsibility should not be delegated.

The core responsibility of the DSL is to maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice.

The DSL has standing authority to contact the Local Authority Designated Officer on any matter which the DSL considers cannot properly be dealt with within the school, and has access to safeguarding advice from outside the school, independent of the School Management Committee and the Trustees. Please see [Appendix 1](#) for more details.

4.4 The role of the Deputy Designated Safeguarding Leads (DDSL)

Deputy Designated Safeguarding Leads (DDSLs) are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. They are also trained in *Prevent* and support the DSL in this role.

In the event of a long-term absence of the DSL, the deputy will assume all of the functions above.

4.5 The role of the Co-Chairs of School Management Committee (SMC)

From a safeguarding perspective, for any reference made to Principal/Headteacher in the standards and *KCSIE*, this role is fulfilled by the Co-Chairs. One of the Co-Chairs is the DSL.

The Co-Chairs are responsible for:

- Ensuring that the *Safeguarding and Child Protection Policy* and related procedures are implemented and followed by all staff.
- Ensuring that the Co-Chair who is the DSL has sufficient time and resources to enable her and her deputies to carry out their roles effectively, including the assessment and support of students and attendance at strategy discussions and other necessary meetings.
- Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- Ensuring that students' safety and welfare is addressed through the curriculum.
- Ensuring that there is a whole-school approach to safeguarding which involves everyone in the school, places safeguarding at the forefront and underpins all relevant aspects of process and policy development.

4.6 The role of the trustees

The Trustees hold overall responsibility for devising and implementing a whole school approach to safeguarding and for related policies and procedures including all matters that are subject to this policy and have specific responsibility as described in Part 2 in *KCSIE*.

The Trustees have appointed Wendy Smith, who is also the *Chair of Trustees*, and Gary Primrose as *Safeguarding Liaison Trustees for Child Protection issues*. The Chair of Trustees is responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Co-Chairs.

All trustees receive annual safeguarding and child protection (including online safety) training are up to date with *Keeping Children Safe in Education* including Annex A (Role of the DSL).

The Trustees consider - safeguarding issues at each Trustees' meeting, which are held three times a year at Brockwood Park School. Their role is to provide strategic challenges to test and assure that the school's approach to safeguarding is secure and robust.

The Trustees are responsible for:

- Ensuring that there is at least one Liaison Trustee who oversees *Safeguarding and Child Protection Policies* in the school.
- Ensuring that the DSL is a member of the senior leadership team, has undertaken training for the role including inter-agency working, and that this training is updated at least every two years, and that the DSL and the DDSLs refresh their knowledge and skills at least annually in between.
- Reviewing the procedures for and the efficiency with which the child protection duties have been discharged.
- Ensuring that any deficiencies or weaknesses in child protection arrangements are remedied without delay.
- Ensuring that the DSL has lead authority for safeguarding, including online safety, and understanding of the school's filtering and monitoring systems.
- Approving amendments to child protection arrangements in the light of changing regulations or recommended best practice.
- Ensuring that procedures are in place for dealing with allegations of abuse made against members of staff, including allegations made against the Co-Chairs, a Trustee or the Chair of Trustees.
- Ensuring that *Safer Recruitment* procedures are in place that include the requirement for statutory checks on staff suitability to work with children.
- Ensuring a training strategy so that:
 - All staff, including the Trustees and Co-Chairs, receive annual safeguarding and child protection training
 - DSL and DDSLs receive updated child protection training annually to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols.

- Ensuring that arrangements are in place so that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding and child protection and receive training when they join.
- The Chair of Trustees, Wendy Smith is responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Co-Chairs.
- Ensuring that those benefiting from, or working with, the charity, are not harmed in any way through contact with it.
- Engaging with students and providing opportunities for their voices to be heard, especially those with protected characteristics, students with SEND or students who identify as LGBTQ+.
- Ensuring that the children at Brockwood are taught about safeguarding and how to keep themselves and others safe, while they are at the school, at home and online.
- Ensuring that the school has appropriate filtering and monitoring systems in place, and reviewing their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
 - Reviewing the DfE's [Filtering and Monitoring Standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- Regularly reviewing the effectiveness of the online filtering and monitoring systems at the Trustees' meetings that take place three times a year.
- Making sure that all staff undergo safeguarding and child protection training every year, including online safety, and ensuring that such training is regularly updated and in line with advice from the safeguarding partners.
- Making sure that staff understand their expectations, roles and responsibilities around filtering and monitoring as part of their safeguarding training.
- Being aware of their obligations under the *Human Rights Act 1998*, in relation to the event of a safeguarding issue that involves harassment, violence and abuse, the *Equality Act 2010*, as well as their local multi-agency safeguarding arrangements.

4.7 The Local Authority Designated Officer (LADO)

The *Local Authority Designated Officer* (LADO) should be advised of all cases where it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed a child.
- Possibly committed a criminal offence against, or related to a child.

- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved towards a child or children in a way that indicated she or he is unsuitable to work with children.

In borderline cases an enquiry can be made without naming the individual, so that advice can be sought before any decision about a referral is taken.

Enquiries and referrals go to the LADO service rather than to a named officer, at lado@hants.gov.uk. Hampshire does not operate a LADO telephone line and asks that individual LADOs are not contacted directly.

For all initial enquiries to the LADO service, we submit a [Hampshire LADO enquiry form](#). Initial enquiry forms will be reviewed by a LADO and advice provided as appropriate.

If we wish to make a LADO referral, we fill in the Hampshire LADO Notification Form and email it to LADO@hants.gov.uk. It will be reviewed by the duty LADO, assessed and allocated if appropriate, alternatively LADO advice will be given.

4.8 Multi-agency working

Safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. This policy sets out the school's practice both for children who may be at risk of significant harm, as well as children and their families in need of support, to prevent problems escalating. The school works with other agencies, in line with locally agreed procedures, as set out by the Hampshire Safeguarding Children Partnership (HSCP), and follows its procedures and the shared HIPS procedures covering Hampshire, the Isle of Wight, Portsmouth and Southampton.

Working Together 2026 explains that the three safeguarding partners in relation to a local authority area are defined under the *Children Act 2004* (as amended by the *Children and Social Work Act 2017*) as:

- the local authority
- an integrated care board for an area any part of which falls within the local authority area
- the chief officer of police for an area any part of which falls within the local authority area

The school works with the safeguarding partners for Hampshire - the local authority, the integrated care board and the chief officer of police - in line with the arrangements they publish, and follows the procedures of the Hampshire Safeguarding Children Partnership and the shared HIPS procedures. The DSL maintains the school's working relationship with those partners and knows the current local thresholds and referral routes.

4.9 Parents

The school seeks to work with parents to support students. Each safeguarding concern is assessed by the DSL/DDSL using decision-making criteria. The LADO or Children Services may be contacted as a source of anonymous advice. Following consideration and taking any advice required from the LADO, parents will be contacted regarding any safeguarding concerns involving their child(ren). Where a referral to Children's Services is needed, it is made whether or not the student agrees, and the student is told what is happening and why. Parents are normally informed before the referral is made. They are not informed beforehand where doing so would place the student at risk of harm, or where the student asks that they are not told and the DSL judges, taking advice from Children's Services or the LADO, that this is right in the circumstances. Where a student is 18 or over, parents are not contacted without that student's agreement unless there is a risk to life or of serious harm.

In the event of a concern that a child or children may be abusing another child, the school contacts Children's Services for advice without contacting parents and parents can only be contacted with the agreement of Children's Services.

4.10 Independent Person

The students have access to an independent person for confidential advice and support. The school's Independent Person is Anne Greene. Please see the [Key External Contacts table](#) above.

The students are made aware that she is available to call at any time. She comes into the school at the beginning of term to be introduced in person so that the students are aware of who she is and how she can be contacted.

Her details and details of other people and services are always on the school noticeboard.

5 Safer recruitment practices

The School operates recruitment under a separate *Safer Recruitment Policy* and follows the Government's recommendations for the safer recruitment and employment of people who work with children, in accordance with the *Independent School Standards Regulations*. These arrangements apply to teaching and non-teaching staff, including part-time and temporary staff, and to volunteers.

The School follows the safer recruitment requirements and guidance set out in *Keeping Children Safe in Education* (September 2026) and *Working Together to Safeguard Children* (March 2026), and carries out the appropriate checks to ensure that individuals are suitable to work with children.

All staff, volunteers, and Trustees, undergo the recruitment and vetting procedure set out in the *Safer Recruitment Policy*. The school has taken this approach for some years, and it goes beyond what was required of schools before 1 September 2026.

From 1 September 2026 the supervision exemption from regulated activity no longer applies, and a volunteer who teaches, trains, instructs, cares for or supervises students is undertaking regulated activity where they do so frequently, or on more than three days in any period of thirty days, or at any time between two and six in the morning. Because we are a boarding school, a volunteer who helps overnight is in regulated activity from the first occasion. The school carries out the appropriate safeguarding and DBS checks, including a check of the children's barred list, for volunteers in regulated activity, and where a volunteer who was already helping at the school comes within regulated activity as a result of this change the school confirms their barred list status before they continue. Please refer to the School's *Safer Recruitment Policy* for further details of our recruitment and vetting procedures.

6 What do the staff need to know

All staff should be aware of systems within the school which support safeguarding, and these are explained to them as part of staff induction and annual staff training as well as regular updates in staff meetings. This should include the:

- *Safeguarding and Child Protection Policy*
- *Anti-Bullying Policy*
- *Behaviour of Students Policy*
- *Staff Code of Conduct*
- *Student Supervision and Missing Child Policy*
- *Online Safety Policy*

All staff should be aware of the process for making referrals to local authority children's social care and for statutory assessments under the [Children Act 1989](#), especially [section 17](#) (children in need)¹ and [section 47](#) (a child suffering, or likely to suffer, significant harm)² that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them they are being abused, exploited, or neglected and to be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

All staff should recognise that children may experience prejudice-based harm, including racism, faith-targeted abuse or prejudice, and other forms of discriminatory behaviour. Such experiences may have a significant impact on a child's welfare, wellbeing, mental health and sense of safety, as well as their willingness to seek help, and should be considered within safeguarding practice where appropriate.

¹ 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. Children in need may be assessed under [section 17 of the Children Act 1989](#).

² 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. This includes all forms of abuse, neglect and exploitation.

7 Safeguarding training

Every new member of staff is required to complete an online training course on safeguarding and child protection. This includes online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This is a comprehensive course chosen by the DSL and Deputy DSLs.

This training is then complemented by a safeguarding induction session by the DSL or Deputy DSL. These sessions are held either before the beginning of term or as soon as possible after term starts and at regular intervals throughout the year for new-joiners.

The induction process also introduces new staff to the school's ethos and the context in which staff are expected to work.

The induction session explains:

- Staff responsibility for keeping children safe
- The identity and function of the DSLs
- The school's policies on *Safeguarding and Child Protection* and procedures that staff need to know (all the policies can be found on the school websites) – we specify the staff need to read:
 - *Behaviour of Students Policy*
 - *Staff Code of Conduct*
 - *Online Safety Policy*
 - *Student Supervision and Missing Child Policy*
 - *Anti-Bullying Policy*
- The induction also covers the relevant updates from all government guidance

All the returning staff are required to complete an online training on safeguarding and *KCSIE* annually before the academic year starts. This is complemented by a session held by DSL and DDSLs to ensure their understanding of the school's policies and procedures on safeguarding and online safety.

In addition to the annual training, all staff receive safeguarding and child protection (including online safety) updates in the staff meetings, as required, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Similar training and updates are offered to all Trustees.

The DSL and DDSLs receive annual inter-agency training and attend other courses in the interim, receiving regular safeguarding and child protection updates at least annually. Any update in national or local guidance will be shared with all staff in staff meetings and briefings, then captured in the next whole school training. This policy will be updated during the year to reflect any changes brought about by new guidance.

8 Code of conduct

All staff must follow the Staff Code of Conduct, which sets out expected standards of behaviour toward students. For more information on this please see our *Staff Code of Conduct*.

8.1 Restrictive interventions, including reasonable force

At Brockwood, the use of restrictive interventions would be exceptional and rare. Relationships between staff and students are generally warm, respectful and supportive, and the school seeks to create an atmosphere of support, understanding and dialogue, where situations requiring restrictive interventions do not occur.

There may, however, be rare occasions when it is lawful and necessary for staff to use reasonable force or another restrictive intervention to prevent a student from causing injury to themselves or others, committing a criminal offence, damaging property, or causing serious disorder. Any such intervention must be necessary, proportionate, and used for the shortest possible time, with the least restrictive response appropriate to the circumstances. The school does not use force as a punishment, threat or deterrent. The school does not use seclusion as a disciplinary sanction. Any use of restraint or seclusion would only ever be as a safety measure in exceptional circumstances.

For more information on restrictive interventions please see our *Behaviour of Students Policy*, including information on managing, deescalating, recording and reporting of incidents. These policies are informed by the [Government guidance on Restrictive Interventions \(April 2026\)](#).

9 Child abuse and how to recognise it

All school staff members should be aware of the types of abuse, neglect and exploitation so that they are able to identify cases of children who may need help or protection. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure, they should always speak to the DSL.

Child abuse can happen to any child in any family. KCSIE defines child abuse as a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. They may be abused by an adult or adults or another child or children.

KCSIE identifies four forms of abuse. Physical abuse involves deliberately causing physical harm to a child. Emotional abuse involves persistent emotional maltreatment causing lasting harm to a child's development, and can include serious bullying and exposure to the ill-treatment of others. Sexual abuse involves forcing, causing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening, and includes non-contact acts such as exposure to sexual images. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. Children under 13 can never provide valid consent to sexual activity, and sexual activity with a child under 16 is an offence regardless of whether they agreed to that activity. Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to seriously impair their health or development. Children may also be harmed by other children, and abuse can take place wholly or partly online. Detailed definitions, indicators and examples are set out in [KCSIE Part One, paragraphs 25 to 28](#), which all staff are required to read.

Every member of staff must be vigilant in recognising possible signs of abuse of children, which may be by other children or adults, at the earliest opportunity. It is the responsibility of each member of staff to act whenever abuse is suspected. A child may be experiencing abuse if he or she is:

Every member of staff must be vigilant in recognising possible signs of abuse or neglect at the earliest opportunity. It is the responsibility of each member of staff to act on a concern, not to investigate or decide whether abuse has occurred. Physical signs such as bruising are not always reliable on their own, since children may go to lengths to hide them, so staff should also watch for behavioural signs. A child who is being abused or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries, or be concerned about changing for PE or swimming
- Keep arms and legs covered even in warm weather, or be wary of physical contact
- Look unkempt and uncared for, or change their eating habits
- Appear fearful or withdrawn, or display a marked change in behaviour

- Be reckless with their own or others' safety, or self-harm
- Frequently miss school or arrive late, or show signs of not wanting to go home
- Have difficulty making or sustaining friendships, or challenge authority
- Become disinterested in schoolwork, or seem constantly tired or preoccupied

This list does not cover every possibility, and staff should act on any other behaviour or circumstance that gives cause for concern.

10 Contextual safeguarding

Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Safeguarding incidents and/or behaviours can be associated with factors outside the school, and/or can occur between children outside the school. All staff, but especially the DSL and DDSLs should be considering the context within which such incidents and/or behaviours occur.

Additional information regarding contextual safeguarding can be found [here](#). The NSPCC also gives detailed information on contextual safeguarding which can be accessed [here](#).

11 Boarding

Everything in this policy applies to the whole of life here, and because our students live as well as study at Brockwood there are some matters that a boarding school has to be particular about. The extra vulnerability that comes from living together, and the possibility of abuse between students in a residential setting, are addressed in the section on child-on-child abuse. Our position on relationships and sexual activity between students, and on where students may and may not go in the boarding areas, is set out in the *School Agreements* and in the *Behaviour of Students Policy*, and is explained to students and parents in both handbooks. Arrangements for supervision, night cover, students leaving the site and students who go missing are set out in the *Pastoral Care and Boarding Policy* and in the *Student Supervision and Missing Child Policy*. How students' devices are handled, and how we approach harmful online content that a device may already carry or may reach without passing through the school's filtering, is set out in the *Technology, Internet and Devices Policy for Students* and in the *Online Safety Policy*.

Students do not share overnight accommodation with a student of the opposite biological sex, and a request for support with any degree of social transition is not met by giving access to boarding accommodation designated for the opposite sex. Where sleeping arrangements have to be made on a trip, the same consideration applies, alongside our duties under the *Equality Act 2010*, and where a student does not wish to share with another student of the same biological sex we look for a separate arrangement that does not compromise anyone's safety, comfort, privacy or dignity.

We are a mixed school and the balance between the number of girls and the number of boys shifts from year to year. Where that balance becomes markedly uneven, the DSL and the pastoral team consider with the Co-Chairs whether anything in supervision, in the use of the buildings or in what is discussed with students should change for that year, and record what is decided.

12 Students aged 18 and over

Some of our students are 18 or 19, and some turn 18 while they are here. They are part of the same community and are cared for in the same way, and the National Minimum Standards for boarding schools continue to apply to them in full because they live alongside students who are under 18. What changes on a student's eighteenth birthday is the legal framework for a safeguarding concern about them, and staff need to know that it changes.

A concern about a student who is 18 or over is brought to the DSL in exactly the same way as any other concern, and the police are contacted on 999 where there is immediate danger, or on 101 where a concern may amount to a crime, exactly as for any other student. What differs is what follows. Children's Services will not take a referral about an adult; the referral goes to Hampshire Adult Social Care, on 0300 555 1386 in hours and 0300 555 1373 out of hours, or on the professional referral form. The local authority is required to make safeguarding enquiries where an adult has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves; where that test is not met, the DSL records the reasoning, the level of risk agreed and when it will be looked at again, following the framework published by the Hampshire Safeguarding Adults Board.

The other change is consent. There is no presumption that parents will be told. Where a student is 18 or over, the DSL seeks that student's agreement before discussing a concern with their parents, and contacts parents without agreement only where there is a risk to life or of serious harm. Where the law requires parents to be informed of something, for example an incident in which reasonable force was used, they are informed whether or not the student agrees, and the student is told that this is happening and why. What was decided and why is recorded. Where a student is under 18 but close to their eighteenth birthday, this is thought about in advance rather than on the day.

The offence of abuse of a position of trust protects students under 18. Our expectations of staff conduct do not change at 18, and are set out in the Staff Code of Conduct.

13 Early help and family help

Any child may benefit from support at the earliest possible point, whether or not that support is statutory. This may include support from universal services and community-based Early Help, or from Family Help, which brings targeted early help and statutory support for a child in need under section 17 of the Children Act 1989 together into a single pathway. All staff should be prepared to identify children who may benefit from such support and should discuss emerging concerns with the DSL or DDSL. Staff will be made aware of local thresholds and referral arrangements, including the criteria for Family Help and for child protection enquiries under section 47. Where support is appropriate, the DSL will work with the child, family and relevant agencies to ensure help is provided as soon as problems emerge. Cases will be reviewed and escalation to Children's Social Care considered where the child's circumstances do not improve or deteriorate.

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory *Education, Health and Care Plan*)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently absent /goes missing from education, care or from home
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a family member in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Is a privately fostered child
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Has experienced child-on-child sexual violence and sexual harassment

- Is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviour
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable or is in Alternative Provision
- Is at risk of exploitation, modern slavery or trafficking, including criminal or sexual exploitation.

For more information on the Hampshire and Isle of Wight Safeguarding Children Partnership thresholds of Early Help, Targeted Early Help and Children's Social Care please follow this [link](#).

14 Children with specific educational needs and disabilities (SEND)

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers may exist when recognising abuse, neglect and exploitation. These may include

- assumptions that changes in behaviour, mood or injury relate to the child's condition without further exploration
- increased peer isolation or prejudice-based bullying
- disproportionate impact of bullying without outward signs
- communication barriers and difficulties reporting concerns
- difficulties understanding that what is happening constitutes abuse
- greater dependence on adults for care, and greater isolation as a result
- difficulties understanding the distinction between fact and fiction online or the consequences of online behaviour.

Any safeguarding concern involving a child with SEND will require close liaison between the DSL/DDSL and SENCO. Additional pastoral and communication support will be provided where appropriate. We also consider advice from specialist organisations such as [Mencap](#) and [NSPCC](#).

15 Children with medical condition

An incident relating to the management of a child's medical condition, including allergies, does not in itself automatically constitute a safeguarding concern. However, staff must consider whether an incident indicates that the child may be at increased risk of neglect, abuse or exploitation by a person inside or outside the family. Where such concerns arise, they must be reported to the DSL/DDSL and normal safeguarding procedures followed.

The *Allergy Policy* and the *Medical Policy* set out how the school manages medical conditions and allergies day to day.

16 Young carers

Brockwood Park School recognises that caring responsibilities can affect a child's attendance, attainment, behaviour and emotional wellbeing. Staff should be alert to children who may have caring responsibilities and understand that early identification is important. Where a young carer is identified, the School will consider appropriate support within school and whether support from external partners, Family Help, local authority or health services is required.

In a boarding school this can look different from a day school: a student may be carrying worry about someone at home far away, or may take up caring responsibilities in the holidays. Staff should be alert to a student whose wellbeing shifts around contact with home, or towards the end of term.

17 Procedures for staff for dealing with a disclosure from a child

Dealing with disclosures from a child can be distressing and difficult. The way a member of staff deals with this process is extremely important and must be handled with care. The students are informed as part of their induction who the DSL and DDSLs in the school are, what their roles are, and that they can make a disclosure at any time and to any staff member that they feel comfortable with.

If a child discloses any sort of abuse to a member of staff, reassurance should be given, but it must be made clear to the student that confidentiality cannot be preserved. Staff should listen sympathetically, but take care not to ask leading questions, since this could invalidate any possible legal proceedings. Any disclosure, or any information suggesting that a student may have been abused, must be acted on immediately and passed to the DSL. The following 10 key points may be helpful:

- Always stop and listen to anyone who wants to talk to you about incidents or suspected abuse
- Write notes – if not at the time, then straight after
- Never make a promise that you will keep it secret; instead, give reassurance that only those who need to know will be told
- Do not ask leading questions
- Immediately after the discussion, inform the DSL or Deputy DSLs and complete a safeguarding concern form without delay and normally the same day (copies of these forms can be found at the reception or can be obtained from the DSL); there are also copies in the [Appendix 3](#) of this policy
- Discuss with the DSL whether steps need to be taken to protect the person who may be being abused
- Never attempt to carry out an investigation: Social Services and the Police are trained to do this
- Whenever applicable, the DSL should notify Hampshire Children's Services, without delay and normally the same day
- Never think abuse is impossible or that the accusation is bound to be wrong
- Young people often tell other young people, rather than adults: ensure that other young people are aware of the issue of abuse and how to report it.

18 If staff have concerns about a child

If staff members have any concerns about a child (as opposed to a child being in immediate danger) they will need to decide what action to take. Where possible, there should be a conversation with the DSL to agree on a course of action, although any staff member can make a referral to Children's Social Care, or to Adult Social Care where the student is 18 or over. When raising a concern to Children's Social Care, consideration of what is known about the child's wider context (contextual safeguarding) should also be considered and any relevant information should be passed on.

Relevant staff should understand that safeguarding of children and individuals at risk is a processing condition which allows, where appropriate, special category personal data to be shared without consent.

A student's personal data should not be provided in response to a subject access request where the 'serious harm' test under data protection legislation is met.

If anyone other than the DSL makes the referral, they should inform the DSL as soon as possible. The local authority should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

See flow chart in [Appendix 2](#) setting out the process for staff when they have concerns about a child. If, after a referral, the child's situation does not appear to be improving, the DSL (or the person who made the referral) should press for reconsideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

19 If a child in danger or at risk of harm

If a student is in immediate danger or is at risk of harm, a referral should be made to the police and to Children's Social Care, or to Adult Social Care where the student is 18 or over, immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

20 Safeguarding issues

We are aware of the potential scope for problems relating to emotional and mental health, body image, eating disorders, self-harm, different forms of abuse and neglect, but also radicalisation and extremism. All staff should have an awareness of safeguarding issues that can put children at risk of harm and be prepared to identify children who may benefit from early help.

Staff should recognise that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and that multiple concerns may overlap. Staff should also be aware that children can be at risk of exploitation and modern slavery, both within and outside the home and online.

All staff, including staff who do not work directly with children, are required to read and understand at least Part One of Keeping Children Safe in Education 2026.

All staff are advised to maintain an attitude of ‘it could happen here’ and always act in the best interest of the child and if any staff has any concerns about a child’s welfare, at any level, they should act on them immediately.

Safeguarding issues all staff should be aware of include:

- Child sexual exploitation (CSE) and child criminal exploitation (CCE)
- Female genital mutilation (FGM)
- Mental health
- Child-on-child abuse
- Serious violence and domestic abuse
- Bullying including cyberbullying
- Children absent from education
- Child missing from home or care
- Drugs
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Private fostering
- Preventing radicalisation
- Relationship abuse

- Making or sharing nudes and semi-nudes, including digitally altered or AI-generated images
- Upskirting
- Trafficking

Specific safeguarding issues set out in KCSIE (2026) are listed below. Further explanations of those we haven't described in detail are given in [KCSIE 2026](#).

20.1 Serious violence

Serious violence is a safeguarding concern and may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict or bullying, and may also be associated with criminal exploitation. Staff must report concerns about a child carrying or using a weapon, or expressing an intention to do so, immediately to the DSL or DDSL. The DSL will assess the risk to both the child and others, considering wider safeguarding information, and will take appropriate action. This may include putting in place a safety and support plan and taking action to de-escalate peer conflict. Staff should be alert to indicators that a child may be at risk of, or involved in, serious violence. These may include increased absence, a change in friendships or new relationships with older individuals or groups, a marked decline in schoolwork, signs of self-harm or a significant change in wellbeing, unexplained injuries, or unexplained gifts or new possessions. Risk may be increased where a child has experienced disrupted education, suspensions, permanent exclusion, Alternative Provision or previous offending. Staff should also consider whether there are particular times around the school day when risk may increase. Early support may include trusted adults, social and emotional support, mentoring, therapeutic intervention and appropriate multi-agency support. Where a weapon is involved, the *Searching, Investigation and Confiscation Policy* and the *Behaviour of Students Policy* set out what staff do at the time.

Advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) (2015), guidance on [Criminal exploitation of children and vulnerable adults: county lines](#) (2023) and [guidance for Child Knife Possession Offences](#).

20.2 Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Children may also cause harm to parents, carers or other family members. This is sometimes referred to as child-to-parent or caregiver abuse and may include physical, emotional or

financial abuse, coercive or controlling behaviour or other harmful behaviours. Where such concerns arise, staff should consider the safeguarding needs of all children and adults involved and report the concern to the DSL or DDSL.

20.3 Mental health

The school promotes good mental and physical health, as well as good emotional wellbeing of the whole school population, by creating a safe and calm environment, appropriate curriculum and the overall ethos.

Mental health issues can be de-stigmatised by educating students and staff. This is done through adviser-student conversations, dedicated *Healthy Living* classes, floor meeting discussions, whole-school *ATWAM* activities and staff mental health education workshops with outside mental health specialists. Positive mental health is also promoted through strong pastoral care which aims to recognise emerging issues as early and accurately as possible. This system follows the assess-plan-to-review approach set out by the [DfE Mental Health and Behaviour in Schools](#) guidance (2018).

All staff should be aware that mental health difficulties can, in some circumstances, develop into safeguarding concerns. This may include self-harm, signs of an eating disorder, suicidal ideation or suicide. Mental health difficulties may also be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Only appropriately trained professionals should diagnose mental health conditions. School staff nevertheless have an important role in promoting positive mental wellbeing, identifying concerns early, securing appropriate targeted support and liaising with or referring to specialist services where necessary. Where safeguarding concerns arise, the School's safeguarding procedures must be followed. The DSL/DDSL will consider involving parents or carers where doing so would not place the child at additional risk.

Please see the school's *Mental Health Policy* for more information on how we support children with mental health problems.

20.4 Child Criminal Exploitation and Child Sexual Exploitation

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse in which an individual, organised network or gang takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity. Children may identify themselves as belonging to the network or group and may not recognise themselves as victims. Exploitation can constitute modern slavery. A child cannot consent to being exploited, abused or trafficked. Children who have been coerced into offending or harmful activity should have their vulnerability recognised and treated as potential victims, even where their behaviour appears criminal. Exploitation may occur without physical contact and may be facilitated through technology.

20.5 Modern slavery

Modern slavery encompasses exploitation including sexual exploitation, criminal and financial exploitation, human trafficking, slavery, servitude and forced or compulsory labour. Children may not recognise that they are being exploited and may have been coerced into criminal activity. Any concern that a child may be a victim of modern slavery must be reported to the DSL. The DSL will consider referrals to Children's Social Care, the police and, where appropriate, support any referral by these agencies to the National Referral Mechanism.

20.6 Forced marriage

Forced marriage is a marriage in which one or more of the parties is married without his or her consent or against his or her will. A forced marriage differs from an arranged marriage, in which both parties consent to the assistance of their parents or a third party (such as a matchmaker) in choosing a spouse.

Multi-agency statutory guidance for dealing with forced marriage can be found at [The right to choose: government guidance on forced marriage](#).

It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

20.7 Honour or faith-based abuse (HBA)

Honour or faith-based abuse includes female genital mutilation and forced marriage, which are dealt with below, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If staff have a concern that a student may be at risk of HBA, or may have suffered it, they should activate safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. If in any doubt, staff should speak to the relevant DSL.

20.8 Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of Female Genital Mutilation (FGM), or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate the risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching

the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice [Guidelines](#).

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

20.9 Extremism and radicalisation

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.

The school has a duty under section 26 of the *Counter-Terrorism and Security Act 2015*, known as the Prevent duty, to have due regard to the need to prevent people from being drawn into terrorism.

Anyone with a concern about radicalisation should speak to the DSL, who decides what follows. Where there is an immediate risk to a person, the police are called on 999. Anyone may make a referral directly where the urgency of the situation requires it, and should tell the DSL as soon as possible afterwards. Where a referral is needed but there is no immediate risk, the DSL completes the National Prevent Referral Form and submits it through Hampshire County Council, and contacts the police on 101 if it is useful to discuss the concern first. Advice for staff and for families is available from the police Prevent advice line on 0800 011 3764. Where the concern is about extremism within the school itself, including about a member of staff, a report can be made to the Department for Education through its Report Extremism in Education service. The DSL can also contact Hampshire Children's Services on 01329 225379.

To fulfil this duty:

- All members of staff will take part in the online general awareness training module which helps frontline staff become familiar with the factors that can contribute to the radicalisation of young people who are vulnerable.
- We will ensure that suitable internet filtering and monitoring is in place, and equip our students to stay safe online at school and at home.
- The DSL has completed *Prevent* training to facilitate the further training of Brockwood Park staff. Staff will need to prove their understanding through in-house quizzes produced by the DSL.
- Any young person within the school identified as being at risk of radicalisation will be referred to *Prevent* and, if deemed necessary by the relevant agencies such as the

Police, they might be referred to the [Channel programme](#) or asked to take part in Prevent Police-Led Partnerships support programmes to provide support at the earliest possible stage.

- Ideally the children's parents will be a part of this process, but there is no need for their consent when the school believes the child is at risk of serious harm.
- The school will work with 'Safeguarding Partners' (local authorities, chief officers of police, and integrated care boards) to seek advice, support and guidance drawing on multi-agency expertise, to support students and to prevent exposure to extremist views and political indoctrination.

21 Child-on-child abuse and procedures and guidance for staff

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is abuse by one or more students against another student. It can manifest itself in many ways and can include, but may not be limited to, bullying (including cyberbullying), sexual violence, sexual harassment and sharing nude and semi-nude images. It can also manifest itself in child-on-child relationships through exploitation, criminal, sexual or otherwise. It can also include abuse in intimate personal relationships between children.

Child-on-child abuse should never be dismissed as "banter" or "part of growing up". Brockwood has a zero-tolerance approach to child-on-child abuse, but we also take the view that it could be happening here to ensure extra vigilance concerning this issue. Staff should be clear as to the school's policy and procedures with regards to child-on-child abuse outlined below.

It is important to consider the forms abuse may take and the subsequent actions required:

- Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)
- Sexually harmful behaviour/sexual abuse, e.g., inappropriate sexual language, touching, sexual assault, engaging in sexual behaviour without consent
- Bullying (physical, name calling, homophobic, etc.)
- Cyberbullying
- Making or sharing nudes and semi-nudes, including digitally altered or AI-generated images
- Upskirting (taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm)
- Initiation/Hazing (could include actions, including harassment, abuse or humiliation; could be involved in initiation ceremonies)
- Prejudiced behaviour
- Abuse in intimate personal relationships between peers
- Any form of child exploitation (the use of children for someone else's advantage, gratification or profit often resulting in unjust and harmful treatment of the child; it covers situations of manipulation, misuse, abuse, victimisation, oppression or ill-treatment)
- Serious physical violence or threats of serious violence
- Carrying, threatening with or using a weapon
- Harmful behaviour associated with peer conflict, criminal exploitation or organised criminal activity.

- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents.

The school recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. It also recognises the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously.

Brockwood recognises the scale and impact of sexual harassment and abuse in child-on-child relationships, and that non-recognition or downplaying the scale and scope can lead to a dangerous culture in the setting. Staff must be vigilant and, rather than waiting for a disclosure, recognise young people may not always make a direct report and information may come from overheard conversations or observed behaviour changes. How a setting responds is seen to influence the confidence of others to report what is happening to them. With this in mind the need for a zero-tolerance approach is taken by the pastoral team. We recognise that even if there are no reported cases, such abuse may still be taking place, but not being reported. Training is conducted concerning this issue with all staff members as part of the annual safeguarding training.

The DSL and DDSs also consider it part of their role to help provide a space for children's voices. This is done through providing information specifically on child-on-child abuse, as well as allows space for open discussions on this and other difficult topics (i.e., consent, sending nude pictures, etc., as part of our PSHE/RSE curriculum).

Expected action taken by all staff:

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the school's *Anti-Bullying* and *Behaviour policies*:

- Report any risk of possible abuse to the DSL who will need to refer such abuse to an external safeguarding agency if there are reasonable grounds to believe that a child is suffering significant harm.
- A student against whom an allegation of abuse has been made may be suspended from the school during the investigation.
- The DSL will take advice from the HSCP (Safeguarding Partners) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator. This includes completing the risk and needs assessment to clearly identify the needs and support to be put in place for all concerned.
- If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the HSCP (Safeguarding Partners), parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and

advice will be sought as necessary from the HSCP (Safeguarding Partners) and/or the Police as appropriate.

- Where a child requires additional support, the DSL will consider the appropriate level of intervention in accordance with local safeguarding partnership thresholds. This may include universal services or community-based Early Help, Family Help (which may itself include statutory support for a child in need under section 17 of the Children Act 1989), or, where there is reasonable cause to suspect significant harm, referral to Children's Social Care under section 47. The School will work with partner agencies and contribute to assessments and plans as required.

It is important to deal with a situation of child-on-child abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example: do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of child-on-child abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Restorative approaches are actioned such as recognition of responsibility, dialogue, repair, meeting the needs of those affected, including perpetrators and victims, the unmet needs behind the behaviour. Staff should not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

21.1 Harmful sexual behaviour, child-on-child sexual violence and sexual harassment

Sexual behaviour between children exists on a continuum from developmentally expected behaviour through inappropriate or problematic behaviour to abusive or violent harmful sexual behaviour (HSB). Staff must consider the age and developmental stage of the children involved, the nature and context of the behaviour, consent, power imbalance, coercion, frequency and whether the behaviour is escalating. Where the behaviour may be harmful, it must be treated as a safeguarding matter rather than solely as a behavioural or disciplinary issue.

Sexual harassment is the 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual violence includes rape, assault by penetration and sexual assault without consent. When we reference sexual harassment and violence, we do so in the context of child-on-child sexual abuse.

Sexual violence and sexual harassment can occur between two children of any age and sex, it can occur through a group of children sexually assaulting or sexually harassing a single child or group of children; it can exist on a continuum and may overlap; it can occur online or face-to-face (both physically and verbally) and are never acceptable. Addressing

inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment, and those will more likely be perpetrated by boys. However, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. With regards to the law, as a school, we make sure we explain, through our Online Safety education, and overall PSHE/RSE programme, that the law is in place to protect children and young people rather than criminalise them.

Consent means having the freedom and capacity to choose. Consent must be present each time sexual activity occurs and can be withdrawn at any time. Consent to one form of sexual activity does not amount to consent to another. Staff should consider whether power imbalance, coercion, age, developmental stage, disability, intoxication, fear or other factors may affect a child's freedom or capacity to consent.

Responding to reports of sexual harassment and sexual violence

The initial response to a report from a child is important and the response to the report should be immediate. This will have an impact on the confidence of future victims to report or come forward. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. Professional decisions will be made on a case-by-case basis, with the relevant DSL or DDSL taking a leading role and using their professional judgement, supported by other agencies, such as referring the child to Early Help, Children's Social Care and the police as required.

Effective safeguarding practices when making a report include:

- Listening carefully, being non-judgmental and not asking leading questions
- Not promising confidentiality, and sharing the report with those that will support the progressing of it
- Recognising that a child is likely to disclose to anyone they trust, this person should be supported in being respectful to the child
- Remain engaged with the child and preferably make notes immediately after, recording only the facts
- In the case of an online element, not to view or forward illegal images of a child
- If possible, to manage a report with two members of staff present
- Informing the DSL or DDSL as soon as practically possible
- Evaluate associated risks and put in place a risk assessment if necessary

What to consider following a report of sexual violence and/or sexual harassment:

- Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between children
- Importance of understanding intra-familial harms and any necessary support for siblings following incidents
- Are there ongoing risks to the victim, other children, adult students or school or college staff, and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation
- Where necessary, thoughtful consideration of bail conditions, navigating the legal process, and handling cases involving reports that are unsubstantiated, unfounded, false, or malicious
- Ongoing approach that prioritises safeguarding and providing support to the victim, ensuring continuous consideration of evolving circumstances, and extending support to the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

There must be careful reporting of child-on-child sexual violence and harassment to ensure that we can consider if there are wider cultural issues at play within the school. In recording it separately from other safeguarding issues (in the *Sexual Harassment And Sexual Abuse Log*) we can look out for patterns of concerning, inappropriate and problematic behaviour.

21.2 Making or sharing nudes and semi-nudes, including AI-generated imagery

For the purposes of this policy, 'making or sharing nudes and semi-nudes' refers to creating, sending or posting nude or semi-nude images involving children under 18. Images include photographs, videos and livestreams and may be taken by the child themselves, created by

another person, digitally altered or wholly generated using artificial intelligence, including deepfakes or 'deep nudes'. All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether the sharing appears consensual or non-consensual.

The school's approach to incidents involving the making or sharing of nudes and semi-nudes is:

- The incident should be referred to the DSL as soon as possible.
- The staff making the referral **must not**:
 - View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
 - Delete the imagery or ask the student to delete it
 - Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
 - Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
 - Say or do anything to blame or shame any young people involved
- Staff must not view or forward illegal images of a child. Where viewing is unavoidable or a device may contain evidence, the DSL will follow the applicable UKCIS guidance and consider whether the device should be preserved and passed to the police
- The staff should explain to the students that he/she needs to report the incident, and reassure the student(s) that they will receive support and help from the DSL.
- The DSL should hold an initial review meeting with appropriate school staff. The purpose of this meeting is to determine:
 - Whether there is an immediate risk to student(s)
 - If a referral needs to be made to the police and/or children's social care
 - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
 - What further information is required to decide on the best response
 - Whether the images or videos have been shared widely and via what services and/or platforms (this may be unknown)
 - Whether immediate action should be taken to delete or remove images or videos from devices or online services
 - Any relevant facts about the students involved which would influence risk assessment

- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or Children's Social Care if:
 - The incident involves an adult
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
 - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
 - The imagery involves sexual acts and any student in the images or videos is under 13
 - The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with the other Co-Chair and other members of staff as appropriate, may decide to respond to the incident without involving the police or Children's Social Care. The decision will be made and recorded in line with the procedures set out in this policy.
- If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the students involved (if appropriate). If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the police immediately.
- The parents will be informed at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.
- All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.
- Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE programme.

The UKCIS have given useful guidance [sharing nudes and semi-nudes](#).

22 Handling a disclosure: what happens next

All staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the *Children's Act 1989* that may follow a referral, along with the role they might be expected to play in such assessments.

Staff should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care. All victims are reassured that they are being taken seriously and that they will be supported and kept safe.

- A detailed record of any allegation of abuse must be made at the time of disclosure, and given to the DSL (or in her absence the DDSLs). The matter must not be discussed with anyone else.
- Whenever possible, there should be a conversation with the DSL (or deputies), who will help staff decide what to do if they have a concern. Options include: managing any support for the child internally via the school's own pastoral support processes; an early help assessment; or a referral for statutory services, for example as the child is in need or suffering or likely to suffer harm.
- The student making the disclosure should be told that this must be reported to the DSL or the Deputy DSLs, who, in conjunction with the other Co-Chair of the School Management Committee or the Liaison Trustees for Child Protection Matters, in the case of the Co-Chair's absence, will take advice on the school's course of action – including contact with parents and others, where appropriate. In the most serious cases contact with the police is required. Where a referral is needed, the DSL makes it without delay and normally the same day, and in any event as agreed with Children's Services or the LADO.
- Once the record has been passed on to the (D)DSL the person to whom the disclosure was made will be informed as to whether or not the matter has been referred to Children's Services and/or parents have been informed. It is unlikely that any other staff, apart from the other Co-Chair, will be given details of the abuse. This is to protect the privacy of the child(ren) and protect them from further abuse. Those who have been abused are particularly vulnerable to further abuse. However, anyone concerned that a matter may not have been appropriately addressed should contact the Children's Services directly.
- The DSL will call in the appropriate assistance, including Hampshire Children's Services, who will advise on the support of the child (or children in cases where the allegation is against a child), and the passing of information to parents and others, as well as the next steps that will be taken. If Children's Services decide an investigation is required, they will carry that out and this will include contact with parents and the children concerned.

- Pastoral support of a child making a disclosure, or a child who is accused of abusing another, is essential and parents are normally best placed to provide this, working in partnership with the school. The school will discuss appropriate support with Children's Services to ensure that confidentiality isn't compromised and any support doesn't compromise an investigation. If they haven't already done so, the student may then also wish to seek the support of their Student Adviser and/or other trusted adult in the school, and this should be encouraged. It is important to convey to the student a sense of support and sympathy where appropriate.
- If after consulting the LADO a decision is made that a referral to Children's Services is not appropriate, parents of any children concerned will be contacted as soon as possible with details of any concerns, and then the school will aim to work with the student/s and parent/s, as well as relevant colleagues and appropriate external agencies to seek to resolve any issues and ensure appropriate support is in place for the student/s.

23 Safeguarding concerns or allegations made about staff including supply teachers, trainee teachers, volunteers and contractors

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career.

This part of the guidance has two sections covering the two levels of allegation/concern:

1. Allegations that may meet the harm threshold.
2. Allegations/concerns that do not meet the harm threshold

23.1 Allegations that meet the harm threshold

An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (i.e., behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk)

23.1.1 Procedure

If staff have a safeguarding concern, or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, trainee teachers, volunteers, and contractors), then this should be referred to the Co-Chairs. Where there is a concern/allegation about the Co-Chairs, this should be referred to the Chair of Trustees. Where the concern or allegation is about a Trustee, it is referred to the Chair of Trustees. Where it is about the Chair of Trustees, it is referred to the other Safeguarding Liaison Trustee, and the DSL also notifies the Local Authority Designated Officer directly; a member of staff who would rather not raise it inside the school may contact the LADO service or the school's Independent Person directly.

In the event of an allegation that meets the criteria set out above, one of the Co-Chairs, the Chair of Trustees or, where the concern is about the Chair of Trustees, the other Safeguarding Liaison Trustee will become the 'Case Manager' and they will take the following steps:

- Contact the LADO immediately or at the latest within one working day

- Conduct basic enquiries in line with the LADO's advice to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The Co-Chair / Chair of Trustee may, on occasion, consider it necessary to involve the police before consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the Case Manager will notify the LADO as soon as practicably possible after contacting the police
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the Case Manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO, police and/or children's social care services, as appropriate
- Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. Where the Case Manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, they may make a referral to Children's Services. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details. When a member of staff who is suspended pending the conclusion of an investigation of a child protection nature is also resident in boarding accommodation, arrangements will be made for alternative accommodation
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom,

as well as what action should follow both in respect of the individual and those who made the initial allegation

- If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff can use one of the school counsellors, or another colleague for support
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The Case Manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the *Secretary of State* has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the *Teaching Regulation Agency*.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

23.1.2 Additional considerations for supply teachers, trainee teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher, trainee teachers or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures:

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The Case Manager will discuss with the agency whether it is appropriate to suspend the individual, or to redeploy them, while the school carries out its enquiries.

- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

23.1.3 Specific actions

23.1.3.1 Action following a criminal investigation or prosecution

The case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, considering information provided by the police and/or children's social care services.

23.1.3.2 Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the *Teaching Regulation Agency* to consider prohibiting the individual from teaching.

23.1.3.3 Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

23.1.3.4 Unsubstantiated, unfounded, false or malicious reports/allegations

If a report/allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps.

If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

If shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

23.1.4 Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

23.1.5 Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file). For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Records of allegations are retained at least until the individual has reached normal pension age, or for ten years from the date of the allegation if that is longer. Records relating to child sexual abuse are not destroyed while a national inquiry into child sexual abuse is in progress, and the DSL keeps the position under review.

23.1.6 References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

- Include substantiated allegations, provided that the information is factual and does not include opinions

23.1.7 Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

23.1.8 Non-recent allegations

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

23.2 Allegations that do not meet the harm threshold (Low-Level Concerns)

Brockwood Park School is a community of students and staff living together and creating an atmosphere of home away from home which is imbued with genuine care, affection and attention. Brockwood Park School is a small school and has a very high ratio of staff to students in order to care for the holistic welfare of the students in line with the ethos and intentions of the school. Relationships therefore are not similar, for example, to a day school of hundreds of students. When considering behaviour of staff in relation to low-level concerns, the above naturally is taken into account in order to consider and define whether the nature of an interaction is a concern or not.

23.2.1 Definition of low-level concern

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the school may have acted in a way that:

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

Examples of such behaviour could include, but are not limited to:

- Being over friendly with children in a way that feels out of character with the community
- Having favourites and so creating divisive and untrustworthy relationships in the school
- Taking photographs of children on their mobile phone unless specific permission is given by the School Management Committee
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door without good reason
- Using inappropriate sexualised, intimidating or offensive language

23.2.2 Sharing/reporting low-level concerns

At Brockwood we ensure that we promote an open and transparent culture in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person. We encourage an open and transparent culture, where no matter how small the concern the staff feel safe sharing with the Co-Chairs, one of whom is the DSL.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Within a supportive environment enable staff to share any low-level concerns they have
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school’s safeguarding system
- Ensuring that the senior staff listen and believe staff

- Considering whether wider cultural issues have allowed the behaviour to occur
- Reviewing policies and procedures regularly
- Providing extra training if deemed appropriate and necessary

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Low-level concerns which are shared about contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

23.2.3 Responding to low-level concerns

All low level concerns should be shared with the Co-Chairs. If a staff member has a low level concern, they should share it with the Co-Chair by completing a *Low-Level Concern Form* and giving it to the Co-Chairs, or through a conversation with the Co-Chairs. The Co-Chairs will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved in the concern and any witnesses. If there is a concern about the Co-Chairs, this should be referred to the Chair of Trustees. The *Low-Level Concern Form* can be found at the end of this policy in [Appendix 4](#), or the Co-Chairs can provide a copy.

The Co-Chairs should be the ultimate decision makers in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the Co-Chairs may wish to consult with the LADO and take a more collaborative decision-making approach.

23.2.4 Recording low-level concerns

All low-level concerns will be recorded in writing on the *Low-Level Concerns Log* by the Co-Chairs. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be:

- Kept confidential, held securely and handled in accordance with data protection law
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold we will refer it to the LADO at the local authority
- Retained at least until the individual leaves their employment at the school

23.2.5 Reference

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

24 What staff should do if they have concerns about safeguarding practices in the school

All staff must remember that the welfare of the child is paramount. The school's *Whistleblowing Policy* enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. At Brockwood a culture of openness and trust encourages a culture where staff feel equally responsible for holding the community and so are also able to raise concerns.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Co-Chairs. Concerns about either of the Co-Chairs, about a Trustee or about the Chair of Trustees are reported as set out in the section on safeguarding concerns or allegations made about staff, and without informing the person the concern is about.

All information must remain confidential, unless advised otherwise by the police, court or Children's Services. The welfare of the child is essential and this will be the prime concern in terms of investigating an allegation against a person in a position of trust.

Where a member of staff does not feel able to raise a concern through the Co-Chairs or the Trustees, they can contact the NSPCC Whistleblowing Helpline on 0800 028 0285.

25 Other Safeguarding Responsibilities

25.1 Looked-after children

A child who is looked after by a local authority (referred to as a looked-after child) means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority. A previously looked-after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked-after children safe. When dealing with looked-after children and previously looked-after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.

Where the school admits a student who is looked after, or who was previously looked after, the DSL holds responsibility for the arrangements, knows who the student's social worker and the responsible Virtual School Head are, and makes sure that the staff who need to know the student's circumstances know them. Care is taken over what is shared and with whom, so that a student is not defined in the community by their circumstances.

25.2 Children absent from education

Absence from a boarding school can be a first sign that something is wrong at home or in a student's wider life, and so absence is treated as a pastoral and safeguarding matter and not only as an administrative one. The Attendance Policy sets out how attendance is recorded and followed up, and it is the document to read alongside this section.

Where a student is absent and the reason is not known, or where absence repeats, the DSL or a DDSL contacts parents to establish the cause, and contacts Children's Services if the school is not satisfied that the absence is appropriate.

Because all our students board, the school is not required to keep an attendance register and the attendance return that other schools make to the local authority does not apply to us. The duties that do apply are these. The school notifies Hampshire County Council whenever a student's name is entered on the admission register, within five days, and whenever a student's name is deleted from it, giving the ground for the deletion. A student's name may only be deleted on one of the grounds set out in the regulations. Where a student of compulsory school age has not returned within ten school days of the end of a period of leave, or has been continuously absent for twenty school days without leave, the school and the local authority must jointly make reasonable efforts to find out where the student is and, if they are found, must agree that there is no reasonable prospect of return, before the name can be deleted. Where a student is above compulsory school age the same twenty school day ground applies but the reasonable efforts are the school's own.

Where the school comes to believe that a student of compulsory school age will not be returning and no onward school or other education has been notified in writing, a referral is

made to the children missing education team at the student's home local authority as soon as possible, in addition to the deletion return.

Where reasonably possible the school holds more than one emergency contact number for each student. This goes beyond the statutory minimum, which is one telephone number for each parent the student normally lives with.

25.3 Unexpected death of children

Sadly, unexpected child deaths do occur. If the school becomes aware that a child has died then the school notifies the HIPS Child Death Overview Panel within 24 hours, using the child death notification form on the eCDOP system at www.ecdop.co.uk/HIPS/Live/public, and the DSL informs the other Co-Chair and the Chair of Trustees. The panel can be contacted at hiowicb-hsi.hips.cdop@nhs.net.

25.4 Preventive strategies

We want to make sure that we have an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive PSHE/RSE curriculum that aims to tackle issues such as prejudiced behaviour and gives children an open forum to talk things through rather than seek one-on-one opportunities to be harmful to one another.

This openness is not incidental to how we teach — it reflects the school's ethos on education as a whole. Much of what happens at Brockwood, in lessons and in daily life, is an invitation to look honestly at oneself and at one's relationships with others. A culture where students and staff are actively encouraged to look at themselves and each other honestly is, in itself, one where problems are less likely to stay hidden.

If issues do arise it is important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.

The structure of the school and its ethos naturally gives students a strong voice and encourages them to speak up as well as to support changes and develop acceptable behaviour in the school and among themselves which goes far in helping to create a positive and supportive atmosphere in the school and one where all students understand the boundaries of behaviour before it becomes abusive.

25.5 Safeguarding amongst students and the curriculum (teaching students how to keep safe)

Our curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our students. All our staff play a vital role in this process, helping to ensure that all of our students relate well to one another and feel safe and comfortable

within the school. At Brockwood, finding out who you actually are, becoming comfortable with that, and learning how to relate to others is at the heart of what we mean by education. In our observation, students who have this kind of understanding about their own responses and relationships are often better equipped to notice, and to speak out, when something is wrong, not only for themselves, but also for friends they care about. We have seen this happen: a student coming to a member of staff not with a concern of their own, but with a concern about a friend. This is also, we think, a natural result of the caring environment of the school itself — students who feel cared for tend to extend that same care to one another.

We expect all staff to lead by example, and to play a full part in promoting an awareness that is appropriate to their age amongst all our students on issues relating to health, safety (including online) and well-being. All the staff, including all non-teaching staff, have an important role in encouraging that our students always adhere to the standards of behaviour set out in our *Behaviour of Students Policy* and in applying our *Anti-bullying Policy*. Residential staff have a particularly important role to play.

25.6 Relationships and Sex Education (RSE) and Personal, Social, Health and Economic Education (PSHE)

We are aware of the importance of *Relationship and Sex Education* (RSE) as well as *Personal, Social, Health and Economic Education* (PSHE) and have developed strong PSHE/RSE programmes to help students stay safe, and gain important knowledge and skills in these fields.

The topics included in lessons, such as child-on-child sexual violence or sexual harassment are dealt with in a child-centred approach, as are other topics such as LGBTQ+ inclusion to help us counter homophobic, biphobic and transphobic bullying and abuse. We are aware that children who are LGBTQ+, or perceived to be, can be targeted by other children and for that reason we make sure that a trusted adult with whom they can be open is available to them at all times. The curriculum is carefully planned to ensure that topics are dealt with in a thorough but sensitive manner, in an age appropriate way.

Time is allocated in assemblies, *ATWAM* events, *Healthy Living* classes, *Inquiry Time*, floor meetings and student advising to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. We use appropriate opportunities to discuss with the students the unacceptability of bullying and abusive behaviour and to promote appropriate relationships with staff.

For more detailed information please read the Brockwood Park *PSHE/RSE Policy*.

25.7 Internet and technology education and Online Safety

Our IT and Online Safety programme aims to teach students to use the internet and electronic equipment safely, inside and outside of school. They are alerted to the dangers posed by adults and young people in person and online; to bully, groom, abuse or radicalise others. Our

Online Safety programme is an important way to educate our young people about how to keep themselves and others safe and what to do if they have concerns.

Our *ICT Acceptable Use Policies* for students and those working at the school sets out its expectations of behaviour in relation to use of the internet and ICT and the way in which the school seeks to protect students from the negative aspects of ICT, such as cyberbullying, and build resilience amongst students so that they can protect themselves and others.

Online contact risks include harmful interactions not only with other users but also with generative AI applications that simulate interaction with another person. Online conduct risks include making, sending and receiving explicit images, including images generated or altered using artificial intelligence.

Our *Online Safety Policy* outlines the safe use of generative AI and ensures compliance with the [DfE's Generative AI: Product Safety Expectations](#). This includes how to use generative AI safely, as well as how existing filtering and monitoring requirements apply to its use within our school setting. Staff are encouraged to familiarise themselves with this guidance to ensure that any use of AI technologies supports safeguarding and maintains a safe learning environment for all students.

For more detailed information please read the *Technology, Internet and Devices Policy for Students*, including the *Acceptable Use Policies*, and the *Online Safety Policy*.

At Brockwood we aim to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers and trustees
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community. The School recognises the DfE expectation that schools should be mobile-phone-free environments by default and that student access to mobile phones during the school day should be by exception. At Brockwood, students' smartphones are held by the school during the week and returned on Saturdays, and simple 'dumb' phones may be used in a designated outdoor area. . The arrangements are set out in the *Technology, Internet and Devices Policy for Students*.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Educate students about online safety, misinformation, disinformation (including fake news), conspiracy theories, as part of our PSHE/RSE programme
- Train new staff, as part of their induction and all other staff at least once a year, on safe internet use and online safeguarding issues including cyberbullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' meetings
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (Content, Contact, Conduct and Commerce) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Include online safety in the regular, at least annual, safeguarding updates given to all staff in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the *Safeguarding and Child Protection Policy*, including sections on online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Where a student misuses the school's ICT systems or internet, we will follow the procedures set out in our *Safeguarding and Child Protection Policy* and *Behaviour of Students Policy*. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Ensuring that any online safety incidents, depending on the incidents, are either logged in the online safety incident log or in the pastoral records and are dealt with appropriately in line with this school's safeguarding policy and procedures.

For more information on this please see our *Online Safety Policy*. This policy sets out the aim, scope, clear roles and responsibilities, education, security and management of information system including filtering and monitoring tools and procedures, incident and response, training and monitoring arrangements,

25.8 Arrangement for visiting speakers

The school has clear protocols to ensure that any visiting speakers are assessed, appropriately supervised and suitable. These can be found in the *Guests and Visitors Policy*. The school's responsibility to students is to ensure that they can critically assess the information that they receive as to its value to themselves, and that such information is aligned to the ethos and values of the school and universal human values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

25.9 Arrangements for additional online tuition, appointments and meetings

The school cannot guarantee the safety of some online platforms used by external practitioners not recommended or organised by the school. Additionally, we cannot carry out recruitment checks on people who are not employees, and we cannot supervise sessions that

are conducted in this way. Parents must ensure they are satisfied that their children are adequately safeguarded during online tuition, appointments and meetings. Parents may ask for a session to be held on an alternative platform, and the school will agree to one that it is able to support.

School staff will of course remain vigilant and if they observe or overhear concerning behaviour in relation to these private sessions, they will follow our safeguarding procedures.

25.10 Extended services and off-site arrangements

Where extended school activities are provided by and managed by the school, our own *Safeguarding and Child Protection Policy* and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective safeguarding, child protection and health and safety arrangements are in place.

25.11 Site security and students' supervision

Although Brockwood Park School maintains a relatively relaxed atmosphere, the safety of our students is of paramount importance. Staff do not wear uniforms or lanyards; however, due to the small size of the school, students are familiar with all staff members by name.

All visitors are required to report to reception at Brockwood to wear a visitor's badge and lanyard and be accompanied by an adult member of the school unless they are attending a publicised event or are on a tour with students (in which case there should always be two students present) or staff. If they are visiting the school at a time when reception is closed, they should be met and be accompanied by a member of staff. Staff are required to ensure that all visitors, whether or not they are known, comply with these requirements. Students are encouraged to be polite and welcoming but also to enquire who visitors are and to tell them to report to reception if they are not accompanied by staff.

Boarding accommodation at Brockwood is only accessible by keypad to the students in the relevant wings, the Pavilions and Cloisters, the staff who live and work in them and other relevant staff members. The key code should not be given to other staff, or visitors, working in the area. If the code is breached it should be changed within 12 hours.

Brockwood Park is situated on a rural site. No public footpaths run through the site.

Students are permitted to leave the site unaccompanied by an adult by arrangement with parents/guardians. Unless agreed with parents/guardians they must be accompanied by other students or staff and use the signing in/out process. If a student does not wish for the parents to be informed that they are leaving the site (for example, older students with confidential medical appointments), then the Pastoral Coordinator may give permission for absence but a member of staff should accompany them if they are under 18.

All students receive a thorough induction into the procedures outlined above at the beginning of the school year, as well as frequent reminders.

For more information, please see the school's site security risk assessment.

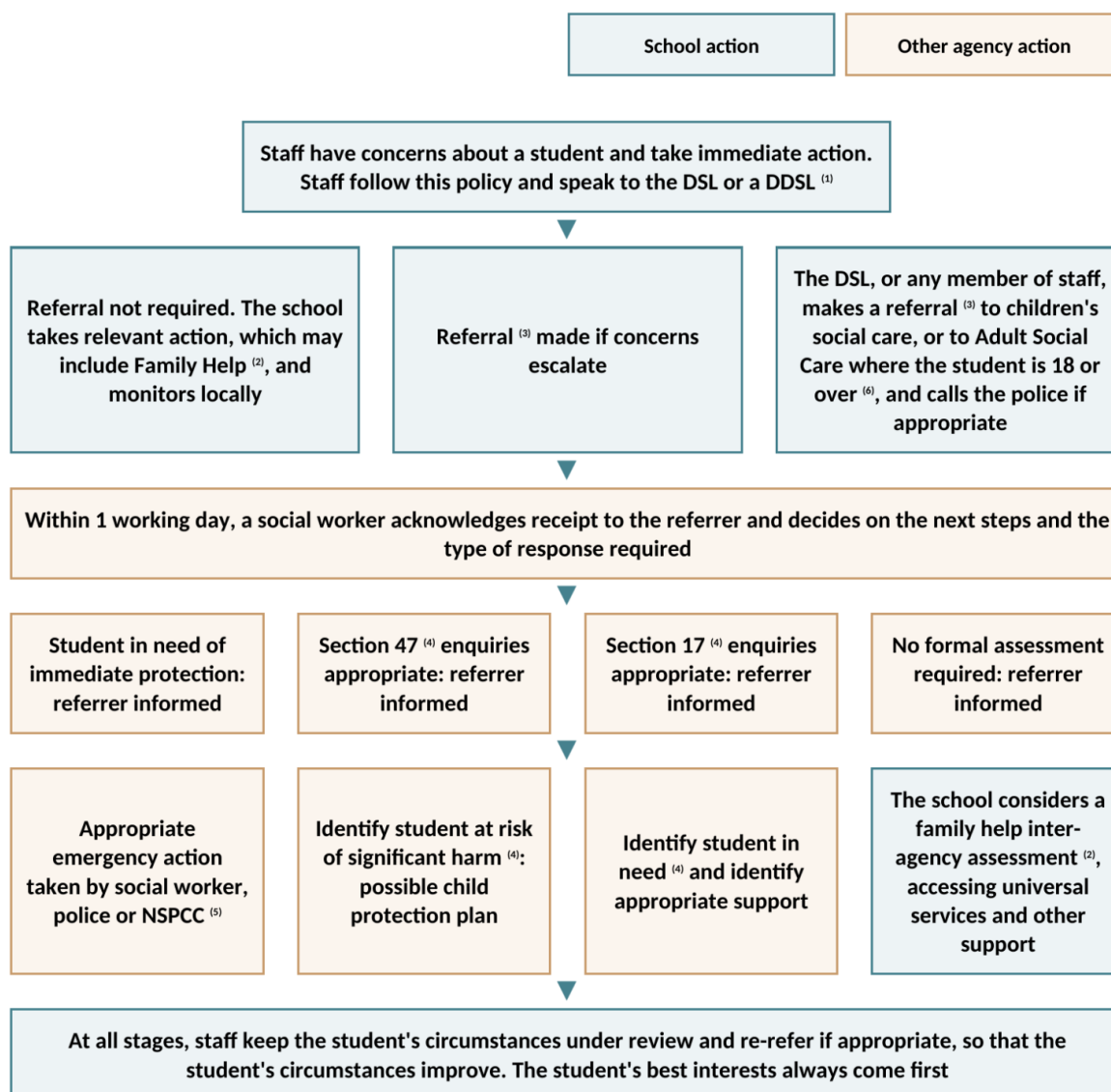
Appendix 1: Role of the Designated Safeguarding Lead (DSL)

Please read in conjunction with the 'DSL role description' in KCSIE (2026).

As well as adhering to the responsibilities of all staff listed above, the DSL's role includes:

- Being the person most likely to have the full safeguarding picture and, therefore, the most appropriate person to advise on the response to safeguarding concerns
- Take lead responsibility for safeguarding and child protection, including online safety and *Prevent*
- Support the Trustees in fulfilling their responsibilities under section 157 of the Education Act 2002 and paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014
- Undertake training for the role, updated at least every two years, and keep knowledge and skills current in between at regular intervals and at least annually.
- Ensure every member of staff knows who the DSL is, is aware of the DSL role and has their contact details
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL
- Ensure that whole-school training occurs annually so that staff and volunteers can fulfil their responsibilities
- Ensure any members of staff joining the school outside of this training schedule receive induction post appointment
- Keep written records of child protection concerns securely and separately from the main student file and use these records to assess the likelihood of risk
- Ensure that copies of safeguarding records are transferred securely and with confirmation of receipt (separate from student files) when a child transfers school
- Ensure that when a student transfers school and is on a child protection plan or is a looked-after child, the information is passed to the new school immediately and securely, with confirmation of receipt, and that the child's social worker is informed. The DSL should consider sharing information in advance of transferring the child protection file if that may be in the child's interests, including with the SENCO
- Link with the HSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Contact the LADO on any matter that the DSL considers cannot be dealt with properly internally and seek safeguarding advice from outside the school where that is the right course
- Ensure robust cover arrangements are in place whenever the DSL is unavailable so that staff can report concerns and safeguarding information can be securely accessed and acted upon promptly by an appropriately trained DDSL.
- Develop, implement and review procedures in our school that enable the identification and reporting of all cases, or suspected cases, of abuse

Appendix 2: Actions where there are concerns about a student



(1) Where the concern is also a concern or an allegation of abuse against a member of staff, see the section on safeguarding concerns or allegations made about staff. Where the concern is about radicalisation, see the section on extremism and radicalisation.

(2) Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a student would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. *Working Together to Safeguard Children* provides detailed guidance on the Family Help process.

(3) Referrals follow the process set out in the local threshold document and local protocol for assessment, published by the Hampshire Safeguarding Children Partnership. See *Working Together to Safeguard Children*.

(4) Under the Children Act 1989 local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, enquiries must be made under section 47.

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

(6) Hampshire Adult Social Care, 0300 555 1386, or 0300 555 1373 out of hours. See the section on students aged 18 and over. Immediate danger is always 999, and 101 where a concern may amount to a crime, whatever the student's age.

Appendix 3: Safeguarding Concern Form

Logging a confidential safeguarding record of concern	
Child's name	DOB
Today's date	Time
Your name	Your signature
Your role	
Date of concern/incident	Time of concern/incident
Describe the incident as factually as possible. Include: who was involved, where it happened, exactly what happened, etc. Remember to describe clearly any behavioural or physical signs you have observed. Pass this form to the Designated Safeguarding Lead (DSL) within 12 hours of the incident.	
(continue overleaf if necessary)	

Check to make sure your report is clear now – and will also be clear to a stranger reading it next year. Include photocopies of any notes taken at the time.

Section below to be completed by the DSL, DDSL

Received by.....DSL,
DDSL

Date.....Time.....
.....

Proposed action by the Designated Person:

Appendix 4: Low-Level Concern Form

This form can be used to share any concern with either Co-Chair of the School Management Committee, one of whom is the Designated Safeguarding Lead, or, where the concern is about either Co-Chair, with the Chair of Trustees. Their names and contact details are in the table of key safeguarding contacts at the front of this policy. Use it no matter how small or seemingly insignificant the concern, even if no more than causing a sense of unease or a 'nagging doubt', that an adult may have acted in a way that is inconsistent with the school's *Code of Conduct* (including inappropriate conduct outside of work) and/or in a way that on first glance does not appear to meet the 'harm' threshold.

A concise record is required, including brief context in which the low-level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and/or relevant incident(s). (Continue on separate sheets as necessary). The form should be signed, timed and dated.

Details of concern	
Today's date	
Your name	
Your role	
Your signature	

Received by	
Date	
Time	

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].

NO ☐ - Give a brief but valid reason/explanation for not;

YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN:

ACTION/S TAKEN:

Was advice/guidance sought from the LADO and or Human Resources? Yes : ☐ No : ☐

Signed

Dated

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the school's *Code of Conduct* and any associated guidance regarding the management of concerns and or allegations and in accordance with school's Data Management practices/policies.

Low-Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons.