



The Tiffin Girls' School

SAFEGUARDING POLICY

REWRITTEN: September 2026

Approved by: Governing Board
Last reviewed: September 2026
Date of next review: September 2027

KEY INFORMATION

If staff have a concern for the safety or well-being of a child:

- They must log this through our safeguarding portal: My Concern. There is a link to the portal on all desktop computers/laptops at school.
- If staff are away from a desktop they can make a referral by emailing the safeguarding team through DSL@tiffingirls.org. In the referral they should include the following information: What happened? Where did it happen? Who was involved? When did it take place?

If you are not a member of staff and you have a concern for the safety or well-being of a child you should email DSL@tiffingirls.org or phone the school to speak to a member of the safeguarding team.

If a child is in immediate danger, or is suffering or likely to suffer significant harm call the police on **999**.

Anyone can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL or deputy makes the referral.

For children's services' contact details, [click here](#). If you make a direct referral, you will update the DSL or a Deputy DSL as soon as is practically possible.

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Introduction

1. The Tiffin Girls' School has a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.
2. As per KCSIE, 'all practitioners should make sure their approach is child centred, considering at all times what is in the best interests of the child' and that 'it could happen here.'
3. All staff and Governors believe in and are committed to the school providing a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child.
4. Adults in our school know that keeping children safe is everybody's responsibility. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. All children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion, or home circumstances, have equal rights to protection and opportunities.
5. We aim to make sure that:
 - The school has a clear process in place, that is shared with and followed by all members of the school community, when there is a safeguarding concern.
 - Our staff are well trained to recognise the signs of abuse, neglect and exploitation, such that they understand what their responsibilities are and how they should respond when they identify a concern.
 - Our staff act and behave in a way that protects children from risk of harm
 - We keep track of children known or thought to be at risk of harm.
 - We communicate well with all those involved when there is a concern about a child, including parents/carers, other children, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

The law (legislation) and statutory guidance

6. In addition to KRSCP's arrangements and the London Child Protection Procedures and Practice Guidance, The Tiffin Girls' School also follows the laws and statutory guidance below:

This policy is informed by statutory guidance and legislation including but not limited to the [Keeping children safe in education statutory guidance](#) (KCSIE), [Education Act 2002](#), [Working Together to Safeguard Children statutory guidance](#) and [Prevent duty guidance](#).

- The [Children Act 1989](#) is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The [2004](#) amendment is used alongside the Act.
- The [Children Act 1989 Care Planning, Placement and Case Review](#) sets out what responsibilities education settings have for children looked after by the local authority.
- The [Human Rights Act 1998](#) sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the [European Convention on Human Rights](#) (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.

- The Equality Act 2010 states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The Equality Act 2010: advice for schools advises us further.
 - The Public Sector Equality Duty (PSED) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some children may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure children have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.
 - Online Safety Act 2023 is a set of laws that protect children and adults online. It puts a range of new duties on social media companies and search services, making them more responsible for their users' safety on their platforms.
7. More legislation is covered throughout this policy in their relevant sections. Some government guidance is not statutory - instead it supports practitioners, like school staff, in the decisions we make to keep children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

Definitions

8. Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home or online. This includes:

- providing help and support to meet the needs of children as soon as problems emerge
- taking action to ensure that children have the best outcomes
- making sure that the way children grow up is consistent with providing safe and acceptable care
- preventing barriers to children's mental and physical health or the way they develop

Child protection means the processes carried out to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, and in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors, supply staff and self-employed staff.

We will make sure that external providers who let school facilities have appropriate safeguarding measures in place. Their staff are expected to operate within the safeguarding framework of this policy. See 'Lettings and off-site arrangements' for further details.

Safeguarding team is used here to refer to the designated safeguarding lead (DSL) and deputy DSL(s) as a whole. The DSL is the member of the senior leadership team who has the lead responsibility for safeguarding and child protection (including online safety).

Child means anyone under the age of 18. We extend our safeguarding protocols to all students regardless of age. However, support from outside agencies may differ according to the age of the child.

Parent means birth parents or other adults who are in a parenting role, for example guardians, step-parents, foster carers and adoptive parents.

Statutory means what has been decided or is controlled by the law.

Statutory guidance tells us what schools and local authorities must do to follow the law.

The local safeguarding partnership has three safeguarding partners:

- (i) the chief officer of police for an area falling within the local authority (police)
- (ii) the local authority (children's services), and
- (iii) the Integrated Care Board for an area within the local authority (health)

9. In Kingston and Richmond, the local safeguarding partnership (KRSCP) considers education as the fourth safeguarding partner. Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them. Wherever local safeguarding arrangements are referred to in this policy, they mean the arrangements agreed and published by KRSCP or the London Child Protection Procedures and Practice Guidance.
10. The Tiffin Girls' School will publish our safeguarding and child protection policy on our website and hard copies will be available on request from the school office.

Key personnel

Designated Safeguarding lead (DSL) Teacher for children looked after Teacher for young carers Police school safety officer Keith Batchelor Contact details DSL@tiffingirls.org k.batchelor@tiffingirls.org	Deputy designated safeguarding lead/s Kathy Kilpatrick Emma Kilburn Dickon Hares Rachel Smith Margot Johnston Contact details DSL@tiffingirls.org
Chair of Governors Sarah Beeching Contact details chair@tiffingirls.org	Designated Governors for safeguarding/child protection Kate Bevan and Sthen Wiseman Contact details via: governance@tiffingirls.org
Special educational needs and disabilities Coordinator (SENDCo) Alka Yadav Contact details a.yadav@tiffingirls.org	
Designated teacher for Children Looked After Designated governor(s) for Children Looked After	Keith Batchelor Kate Bevan

Children's services:

Achieving for Children (AfC) single point of access (SPA)

- 11.** Anyone can tell SPA about a child, young person or parent/carer who needs support in the boroughs of Kingston and Richmond. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

SPA can be contacted on the [Single Point of Access \(SPA\)](#) website.

If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, SPA should be contacted by phone on 020 8547 5008. If it is outside of office hours and urgent, the SPA duty social worker can be spoken to

on 020 8770 5000.

If a child needs support in the boroughs of:

Hounslow - 020 8583 6600

Merton - 020 8545 4226

Surrey - 0300 470 9100

- 12.** This government website will help identify which local council to report child abuse to and their contact details: [Report child abuse to a local council - GOV.UK](https://www.gov.uk/report-child-abuse-to-a-local-council)

Local authority designated officer (LADO)

- 13.** Every local authority has a legal responsibility to appoint a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the headteacher and the chair of governors, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: LADO@achievingforchildren.org.uk

Telephone: 07774 332675

Online: [Submit LADO referral form](#)

Roles and responsibilities

- 14.** Everybody in our school has a responsibility for safeguarding. Some members of our school have specific safeguarding responsibilities.

The Governing Board

- 15.** The [Academy trust governance guide](#) sets out the roles, responsibilities and legal duties for governing boards.
- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does.
 - Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.
 - The school's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
 - The school is promoting an inclusive, anti-discriminatory culture where discriminatory behaviour is recognised, challenged and addressed as part of its safeguarding responsibilities
 - The school's leadership team is held to account for the impact and success of the school's safeguarding arrangements
 - Safeguarding is a standing item on the agenda for governor meetings.
 - A safeguarding self-audit is submitted to the KRSCP annually that is reviewed by the board

- They appointed Designated Safeguarding Lead (DSL) with the appropriate skills and experience who is given the additional time, funding, training, resources and support needed to carry out the role effectively.
- An experienced governor/s takes leadership responsibility for the school's safeguarding arrangements (known as the safeguarding link governor).
- There is an appointed designated teacher for looked after children who is appropriately trained.
- The board takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect, for example children with special educational needs and disabilities (SEND). They monitor how the school is supporting its students with regard to their protected characteristics
- Child protection files are maintained as set out in Annex B of KCSIE.
- The school works with external agencies to safeguard children and promote their welfare by sharing information and taking appropriate action in a timely manner
- All staff have the relevant skills, training and awareness to keep students safe
- Staff sign to say they have read the appropriate part of KCSIE.
- Governors confirm that they have read and understood parts one and two of Keeping Children Safe In Education 2026 and are familiar with the safeguarding responsibilities relevant to their roles.
- Children are taught how to keep themselves and others safe, including online and how to report any concerns that they may have
- Strong IT systems are in place, including filtering and monitoring systems that limit children's exposure to online risks from the school's IT systems, and cyber-security systems that protect children's personal information. A member of the senior leadership team and a governor are assigned responsibility for overseeing filtering and monitoring arrangements and ensuring the relevant standards are met.
- Appropriate and robust safer recruitment processes and procedures are in place.
- Procedures are in place to identify and address children absent from education, including persistent absence, and when safeguarding concerns coincide.
- There are procedures for preventing, reporting and managing safeguarding concerns about adults who work or volunteer at our school
- The chair of governors will manage any allegations against the headteacher.
- There are effective safeguarding arrangements for when the site is being hired/let.
- All members of the governing board receive safeguarding training at induction, which is updated annually
- The school maintains a Single Central Record

The safeguarding link governors

- They meet with the DSL and visit the school regularly asking questions that allow them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Each year, they are part of the annual safeguarding audit, led by the DSL and headteacher, and make sure it is submitted to the KRSCP.
- They are the governing board's safeguarding specialists, feeding back their findings following school visits and meetings with the DSL.
- They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.
- They keep up to date with the KRSCP's safeguarding arrangements and guidance.
- Check the Single Central Record regularly

The Headteacher

- Has day-to-day responsibility for the school, which includes responsibility for safeguarding
- Is a member of the safeguarding team meeting regularly with the DSL to keep on top of safeguarding issues and enquiries

- Ensures there is a well-equipped safeguarding team to cover the DSL's responsibilities if the DSL is absent or unavailable
- Makes sure that staff are recruited safely and receive a good induction and training
- This policy and other safeguarding related policies and procedures (such as the staff behaviour policy) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.
- Staff receive safeguarding training that is updated regularly.
- Parents and carers are aware of this policy and where they can access a copy.
- Works with the DSL to create a culture of openness and regular opportunities for students, parents and staff to share their views and shape how the school keeps students and staff safe
- The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- They become the 'case manager' when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.
- There are enough staff per child (staff ratios), where relevant and applicable.
- Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.
- Ensures the Single Central Record is accurate and up to date
- Updates the board on how well we are keeping children safe, what safeguarding issues children are facing and how we are addressing concerning trends
- Enforces a mobile phone-free environment for students by default
- Addresses issues with site security and develops the school's response to critical incidents and external threats to the school

The Designated Safeguarding Lead (DSL)

- 16.** The DSL has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from our school's leadership team. The Tiffin Girls' School has Deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.
- 17.** The full responsibilities of the DSL and the Deputy DSL(s) are listed in their job descriptions. The DSL's responsibilities include, but are not limited to:
- Reading and following KCSIE.
 - Always being available during school hours for staff to discuss any safeguarding concerns, or arrange appropriate cover for any out of hours or out of term activities.
 - Is the point of contact for safeguarding partners
 - Refers safeguarding concerns to appropriate and relevant external agencies in line with data protection laws, supporting staff who make referrals directly
 - Understanding and following AfC's and KRSCP's safeguarding procedures, in addition to attending the termly DSL forums provided by KRSCP to ensure they are acting in line with the local safeguarding arrangements.
 - Works with the board to review this policy annually, submit an annual self-audit to KRSCP and review the effectiveness of the school's safeguarding arrangements.
 - Working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise.
 - Encourages a culture of listening to children, taking into account their wishes and feelings when any plans or measures are put in place to protect them
 - Contributing to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions and meetings between multiple agencies.
 - Makes the school's parent community aware of our duty to make a referral to children's services when a child is at risk of or has experienced harm

- Working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of the school's role in making referrals about suspected abuse, neglect and exploitation.
- Understanding the importance of sharing information, including making appropriate referrals to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) and supporting staff who make referrals directly.
- Makes sure child protection files are kept up to date and transferred appropriately
- Keeping the headteacher up to date with safeguarding issues.
- Having the lead responsibility for online safety, including oversight and checking the effectiveness of the school's filtering and monitoring systems and their reports.
- Being aware of the requirement for children to have an Appropriate Adult, as described in PACE Code C 2019.
- Working with the 'case manager' and LADO for child protection concerns that involve a staff member.
- Develops staff's expertise, provides them with advice and support and may consult with them and wider professionals when deciding whether to make a referral
- Making sure that all staff have access to this policy (and the wider safeguarding procedures), the policy is available publicly and reviewed annually.
- making sure that adults who work in or for the school have an adequate safeguarding induction and regular safeguarding training, including an understanding of this policy and wider local safeguarding procedures
- Making sure all adults annually sign to say they have read the relevant part of KCSIE.
- Working alongside the Governing Board and Headteacher to review and update procedures and how they are being implemented, including jointly completing and submitting an annual safeguarding self-audit to KRSCP.
- Works with the headteacher to promote the educational outcomes for children who have involvement from safeguarding partners and reduce the increased risk of harm to vulnerable children
- Promoting the educational outcomes of children who have or had a social worker, by sharing appropriate child protection information with the teacher and leaders.
- Capturing low level concerns on the school's system
- Checking the Single Central Record termly

The Deputy Designated Safeguarding Leads

- Support the DSL with their role and will deputise on the DSL's responsibilities if they are unavailable or absent
- Are trained to the same standard as the DSL.
- Will take on the DSL's responsibilities if they are unavailable. If the DSL is long-term absent, a deputy will temporarily take over as the DSL.

18. In addition, all Heads of Year and SENCO are trained to the same standard as members of the DSL team.

19. Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL's responsibilities, see Annex **B** of KCSIE.

All school staff

- Know it is everybody's responsibility to create a culture and provide a safe environment for children to learn and speak out about their concerns
- Sign to say they have read the relevant part of KCSIE annually.
- Have a responsibility to provide a safe environment in which children can learn.
- Will follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems.
- will follow the school's procedures for reporting safeguarding concerns quickly and confidentially asking for support from the DSL if they are unsure
- Will, whenever necessary, refer/self refer safeguarding or child protection concerns to external agencies, such as the police, children's services and the LADO.

- will attend regular training and are expected to request additional training so they understand how to keep children safe and identify when they may be unsafe
- Attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the staff behaviour policy (code of conduct).
- Create a culture where children who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns.
- Will follow the whistleblowing policy

20. What staff need to know is covered in the training section of this policy.

IT provider

- Maintains the filtering and monitoring systems.
- Provides filtering and monitoring reports to the senior leadership team
- Completes actions following concerns, incidents or checks to the system.
- Attends the annual review of filtering and monitoring from Governors

Training

- 21.** Staff build expertise through their day-to-day safeguarding practice and are given opportunities to contribute to and shape safeguarding training and this policy. All staff receive safeguarding and child protection training, including online safety, at induction. Training is regularly updated and reflects the whole-school approach to safeguarding. In addition, staff receive regular safeguarding updates, for example through email, briefings, e-bulletins and staff meetings, as required and at least annually. Staff confirm that they have read and understood Part One of the latest version of KCSIE. Some staff will undertake additional safeguarding training appropriate to their roles.
- 22.** All governors receive safeguarding and child protection (including online) training at induction that prepares them for testing and challenging the school's procedures and policies making sure they are working as they should be. Their training will be regularly updated. The safeguarding link governor will refresh their knowledge more regularly and receive additional training so they are equipped for their role and stay alert to changes to the safeguarding context. This might include the safeguarding link governor attending the termly AfC safeguarding link governor forum.
- 23.** The safeguarding team will attend regular training to prepare and assist them in leading the school's safeguarding response and strategy. The board will ensure that the training undertaken by the DSL and Deputy DSLs complies with the requirements set out in Annex B of KCSIE. Additional training or research may be required as local and school-specific safeguarding issues arise. The safeguarding team will attend level 3 multi-agency local safeguarding training and Prevent awareness training within 12 weeks of starting the role that they will refresh every two years.
- 24.** We make sure that staff provided by external agencies and third parties, for example supply teachers and contracted staff (including catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

Governing Board

- 25.** All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the school's procedures and policies, making sure they are working as they should. The training will be provided annually. Further:
- The Governing Board will make sure the DSL has the time and resources to attend training.
 - The Chair of Governors will receive training about managing allegations against the Headteacher to assist them in the eventuality that an allegation is made.
 - The Governing Board will make sure that online safety is a theme in all staff training.

- Senior members of the board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
 - The link safeguarding governors will make sure that staff and governors attend safeguarding training at induction and regularly after that. The link safeguarding governors will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.
- 26.** The Governing Board will make sure at least one member of every recruitment panel has completed safer recruitment training within the last three years. The Tiffin Girls' School has a separate recruitment and appointments policy that explains what safeguarding checks are completed before employment to make sure those who work with children are suitable.

Designated Safeguarding Lead (DSL)

- 27.** The DSL will attend regular training to prepare and assist them in leading the school's safeguarding response and approach. Additional training or research may be required as local or school specific safeguarding issues arise. Minimally, the designated safeguarding lead will:
- Attend the level 3 multi-agency local safeguarding partnership training within 12 weeks of starting this role and refresh this every two years.
 - Stay up to date with safeguarding knowledge, resources and changes.
 - Have a good understanding of, and form a good relationship with, the Kingston and Richmond Safeguarding Children Partnership (KRSCP) by attending the termly DSL forums, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer.
 - Attend harmful sexual behaviour and Prevent awareness training.
 - Receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff.
 - Make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity.
 - Gain an understanding of how the school's filtering and monitoring systems work and how they can be best used to keep children safe at The Tiffin Girls' School.
 - Complete Safer Recruitment training

All staff

- 28.** Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive safeguarding and child protection training (including online safety including AI training) at induction. The training is regularly updated and reflects the whole school approach to keeping children safe. In addition, staff receive regular, at least annual, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe.
- 29.** Our training ensures that staff:
- Are clear in their actions and behaviours to keep children from risk of harm
 - Can spot the signs of possible abuse, neglect and exploitation.
 - Know the school's safeguarding procedures and their role in carrying them out.
 - Have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral.
 - Know what to do if a child tells them they are being harmed, including how to manage this information confidentially.
 - Understand the reasons why children may not feel ready or know how to tell someone that they are being harmed.
 - Receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas.
 - Understand what cyber security the school has in place to keep children and staff safe when online at school and how to report any issues.

- Understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues.
 - Know that children who identify as or are perceived to be LGBT can be targeted by other children.
- 30.** We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as sports coaches) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.
- 31.** When joining the school, all staff complete a pre-start safeguarding course, complemented by a new-starter safeguarding session when they begin working at the school. All staff subsequently complete safeguarding training annually, supported by regular updates throughout the year as safeguarding priorities emerge. Periodically, the annual training is delivered as an extended safeguarding update. Staff with additional safeguarding responsibilities complete role-specific external training in accordance with KCSIE and local safeguarding partnership expectations.
- 32.** The Headteacher will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made, and complete safer recruitment training

The designated teacher for children who are looked after (CLA)

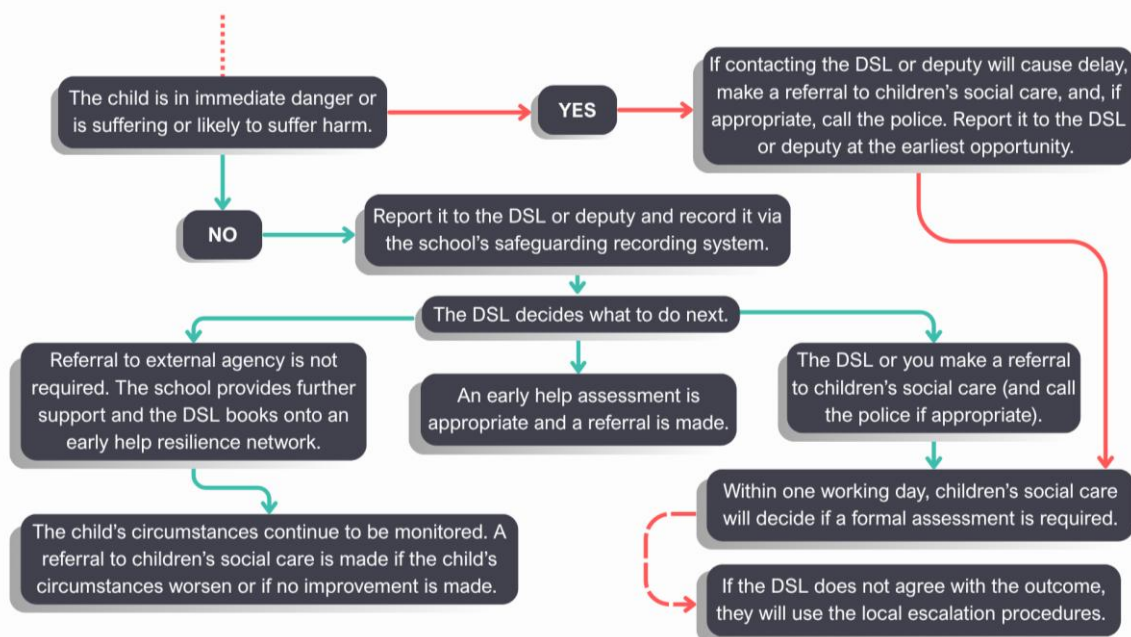
- 33.** We follow the Role and responsibilities of the designated teacher's statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with AfC's Virtual School, accessing their training and forums to stay up to date.

How children can report concerns

- 34.** In our school, it is essential that children can tell us how they are feeling and know we will take it seriously. We aim to create an environment full of 'reachable moments' which encourages children to feel safe enough to open up about their concerns. Children can confidently report any worries they have about their lives, both in and out of school, by:
- Speaking to an adult they trust
 - Speaking to any member of the DSL team
 - Emailing DSL@tiffingirls.org
 - Reporting via the anonymous reporting form
- 35.** Students are made aware of the reporting systems during assemblies, form times, lessons and by posters around the school.
- 36.** We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's voice of the child briefing. When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience.

What to do if you have concerns about a child's welfare

You have a concern about a child's welfare



In cases which also involve a concern or allegation against a staff member, refer to the full policy.

37. If staff have concerns about a child's welfare, they must act on them immediately by following the procedures above. We work hard to make sure our staff and safeguarding team are approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is no evidence as yet. A member of the safeguarding team will always be available for staff to discuss safeguarding concerns. We will have cover arrangements in place if the DSL is unavailable due to illness, leave or other circumstances. Our confidential shared safeguarding inbox and My Concern portal are only accessible to the safeguarding team making sure there is no delay in receiving, monitoring or acting upon safeguarding concerns.
38. If staff have a concern for the safety or well-being of a child:
- They must log this through our safeguarding portal: My Concern. There is a link to the portal on all staff devices.
 - If staff are away from their device they can make a referral by emailing the safeguarding team through DSL@tiffingirls.org
 - In the referral you should include the following information: What happened? Where did it happen? Who was involved? When did it take place?
39. If a child is in immediate danger, or is suffering or likely to suffer significant harm call the police on **999**. Anyone can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL or Deputy DSL makes the referral. For children's services' contact details [follow this link](#). If you make a direct referral, you will update the DSL or a Deputy DSL as soon as is practically possible.
40. The DSL will decide on the appropriate course of action based on [locally-set thresholds](#) and with guidance from the neglect toolkit where neglect is suspected. The options available to them include arranging community-based early help support, requesting targeted early help level support from the local authority's Family Help service, or making a referral to statutory children's services for child in need (CIN) or child protection support. The police will also be contacted if necessary. We have a duty

to share information and work together with relevant external agencies to ensure a child's safety and welfare.

41. The school may take the lead in organising non-school services to provide early help support for the family. Early help support will be kept under constant review. We will consider making a referral to children's services if the child's situation doesn't appear to be improving or is worsening, however we will continue to provide support and contribute to assessments and plans organised by children's services.
42. If we believe that a family needs targeted early help to meet multiple and/or complex needs we will recommend to the family that they accept support from the local authority's Family Help team where a qualified lead practitioner will put a plan in place to support the family. Early help services require the family's consent to receive support and their services.
43. We will make an immediate referral to children's services, and if appropriate the police, where we believe a child is suffering, or is likely to suffer from harm. The safeguarding team will seek advice from children's services whenever they are unsure if the threshold for a referral has been met. If a referral is needed then a member of the safeguarding team should make it. Referrals to children's services will be made through the relevant local authority's procedures who will then make a decision about next steps and the type of response required. The police will notify the school of any domestic abuse incidents they attend that concern a student under the [Operation Encompass](#) duty.
44. We will call the police on 999 if we believe an individual is in immediate danger. The school will also inform the police if we become aware that a crime has been committed. We are aware that children can be criminalised for actions they take whilst under coercion, such as actions they take while being exploited, abused or trafficked. We will treat these children as victims recognising that they are also vulnerable and experiencing abuse. Staff will report concerns about a child carrying or using a weapon (or expressing intent to do so) to the safeguarding team who will assess the risk, take appropriate action and, depending on the risk, put a safety and support plan in place. The school will follow the [local School Related Weapons or Potential Weapons Incidents Protocol](#).
45. If in exceptional circumstances the DSL is unavailable for staff to report a concern, staff will not delay taking appropriate action. Instead, they will inform another member of the senior leadership team (SLT) or themselves seek advice from children's services. Anyone, including children, can make a referral. If for whatever reason a staff member thinks a referral to children's services is appropriate but hasn't been made, they will consult with them and make a referral themselves. In these circumstances, any action taken by that staff member will be shared with the safeguarding team as soon as is practically possible.
46. If after a referral, we are dissatisfied with the response from our safeguarding partners and/or the child's situation does not appear to be improving, the referrer will press for re-consideration to ensure their concerns have been addressed and, most importantly, the child receives the support they need. The safeguarding team will use the [local resolving professional differences procedure](#) where necessary. The safeguarding team meets regularly to monitor children who we are concerned about to make sure each child's situation is improving in good time and the right support is in place to meet their needs and address our concerns.
47. We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. We ask our staff to approach our safeguarding team if they need any support during or following a safeguarding incident.

48. If you are not a member of staff and have a concern for the safety or well-being of a child you should email DSL@tiffingirls.org or phone the school to speak to a member of the safeguarding team.
49. We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. Approach our safeguarding team if you need any support during or following a safeguarding incident. The names of the DSL and Deputy DSLs are clearly advertised around the school. Visitors are provided with information regarding safeguarding when they arrive in school.

Disclosures

50. Disclosures are only one method used to identify children who may be in need of support or protection. Staff are trained to stay alert to other indicators like shifts in behaviour, attendance, or physical and emotional wellbeing. Monitoring behaviour and presentation is particularly vital for pre-verbal children or those with communication differences for us to understand their lived experience. We adopt a safeguarding-first approach to behaviour concerns, considering if the child is communicating an unmet need or whether they are experiencing harm.
51. We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:
- Children may not feel ready or know how to tell someone they are being harmed.
 - The child may not realise what is happening to them is harmful.
 - They may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
52. Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for a child, rather than take what is being said on face value or making assumptions. We encourage staff to ask the child if they are OK or if they can help in any way. A child who makes a disclosure may have to tell their story more than once, such as to the police and social workers. At The Tiffin Girls' School, we know how important it is that a child's first experience of talking to a trusted adult about a worry is a positive one.

Handling a disclosure

- Listen to them carefully and believe in what they are saying. Do not be afraid of silent moments.
- Be careful not to express your own views or feelings and stay calm.
- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a Deputy DSL. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as "Tell me", "Describe" and "Explain". Otherwise, you may invalidate your and the child's evidence in any later court proceedings.
- If there are injuries or marks on the child, do not examine the child intimately or take pictures.
- Reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner.
- Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- Tell the child it is not their fault and you are taking them seriously.
- Explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help.

After a child has made a disclosure

- Write up the conversation as soon as possible.
- Make sure the DSL or a Deputy DSL is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible.
- Do not share the disclosure with **anyone** else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to.
- Get support for yourself if you need it.

Recording a disclosure or safeguarding concern

- Record the date, time, place and persons present.
- Use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it.
- Record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map.
- Keep any original notes you have made on file.
- Do not ask children to make written statements themselves or sign records.

Concerns about a child who is **not** in immediate danger, or is suffering or likely to suffer significant harm

53. The 'what to do if you have concerns about a child' flowchart (in the section 'What to do if you have concerns about a child's welfare') explains what you should do if you have concerns about a child. First, speak to the DSL or a Deputy DSL. If in exceptional circumstances, the DSL or a Deputy DSL are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children's services, if necessary.

Early help

- 54.** Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At The Tiffin Girls' School, we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a Deputy DSL will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
- 55.** Our DSL and/or Deputy DSL use the Early Help Partnership Tool to explore emerging needs and – with consent from the child or family, or anonymously – discuss what is happening with the Early Help Resilience Network to ensure all identified needs are supported by the appropriate agencies. AfC's early help assessment tools and plans can be found [here](#). The partnership's [Early Help Strategy](#) sets out their aims for how professionals work effectively together to provide early help.
- 56.** If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.
- 57.** We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, of KCSIE.

Referral to children's services

58. Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. The DSL and Deputy DSL are aware of the [London safeguarding children partnership's threshold document](#), which will be used to inform their response to any safeguarding concern. If a referral is needed then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

59. If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The local authority 'resolving professional differences' procedure will be used, where necessary.

Confidentiality and information sharing

60. Personal information about children and their families will be processed fairly, lawfully, and securely. Data protection laws tell us how to protect personal data and give us legal powers to share information to keep children safe and promote their welfare. Staff receive regular data protection training where we make them aware of their duty to receive and share safeguarding information confidentially. This means only with professionals who need to know to keep the child safe, such as the DSL, children's services or the police.
61. We will share important information as soon as possible whether that's within the school or with outside partners, such as children's services, so we can quickly get the right support put in place. We work transparently with parents wherever possible, informing them of our duty to share information and refer suspected abuse or neglect to external agencies. While we seek consent from parents when safe and appropriate, we will share information without consent if necessary to safeguard a child, such as when obtaining consent is impossible, cannot be reasonably expected, or would place the child at risk.
62. The Tiffin Girls' School takes our responsibility to protect and look after the data (information) we hold about children and our families seriously. The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) guide us in how to do so. Under the DPA 2018, we will share information without consent if 'the safeguarding of children and individuals at risk' is our reason for doing so, and
- it is not possible to gain consent
 - it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
 - to gain consent would place a child at risk
63. The government's information sharing advice for safeguarding practitioners supports staff who have to make decisions about sharing information. Staff are aware they can look at the data protection in schools toolkit or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."
64. To keep children safe, we will share information in a timely manner including sharing information with agencies and professionals in line with the Working Together to Safeguard Children guidance. We respect that safeguarding matters are personal to families, so the DSL, Deputy DSLs and headteacher will only share information about a child to members of staff and professionals on a need to know basis.
65. All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child's safety or wellbeing. Instead, staff should tell the child that they may need to pass information on to others who can help and protect them.

66. The **Gillick Competence** is the legal term for determining whether a child under the age of 16 has the maturity and understanding to make their own decision on a specific matter, independent of their parents. The assessment of the competence is **issue-specific** and **case-by-case**. A child may be Gillick Competent for one decision but not another. A Gillick-Competent child has a right to confidentiality. They may request confidential help or counselling, staff will respect their wishes unless there is an overriding safeguarding concern (i.e., a risk of significant harm). **Child protection concerns override confidentiality** and the wishes of a Gillick Competent child. Staff must follow statutory guidance on sharing concerns with the appropriate agencies (e.g., Children's Social Care or the police), even if it goes against the child's wishes.

Notifying parents or carers

67. At The Tiffin Girls' School, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from children's services about how and when parents or carers should be updated. It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

Balancing confidentiality requests with safeguarding duties

68. The DSL will give the child affected by harmful sexual behaviour as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered. If the child asks for confidentiality and opposes a referral being made to external services, the DSL will assess the situation case-by-case, balancing their wishes against the school's duty to protect them and others. A referral should be made to children's services if a child has suffered harm, faces a risk of harm, or is in immediate danger. Additionally, reports involving crimes such as rape, sexual assault, or assault by penetration should be reported to the police. Decisions to refer against the child's wishes will be handled with care.
69. If an allegation of sexual harassment or sexual violence enters the criminal justice system, the DSL will have a general understanding of the criminal process, witness support, and the importance of anonymity requirements. Every reasonable effort will be made to safeguard the anonymity of all children involved in a report. This includes evaluating what information staff members need to know and establishing appropriate support. The school will also consider the role of social media in spreading rumours and potentially exposing a child's identity.

Unsubstantiated, unfounded, false or malicious reports

70. If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person making the allegation needs support or may have been abused by someone else, and this was a cry for help. If so, a referral to local authority children's services may be appropriate. If a report is proven to be deliberately false or malicious, we will consider taking action against the individual in line with our behaviour policy.

Record keeping

71. The DSL is responsible for keeping detailed, accurate and secure written records of safeguarding concerns, discussions, decisions made (including the rationale for those decisions), and the outcome. This will include instances where the decision is made that a referral to another agency is not

necessary. Safeguarding concerns and referrals are kept in a separate safeguarding file for each child. Access is limited to those who need it.

- 72.** When a child leaves the school, the DSL will ensure their safeguarding file is transferred to the new school or college separately from their main file and within 5 days for an in-year transfer or within 5 days of the start of a new term. A confirmation of receipt will be kept. Where appropriate, the DSL will share additional information in advance of a child leaving, particularly where the information would support an assessment of risk to others as well as the individual student and help the setting put in place the right support.
- 73.** When a child starts our school, we will review any safeguarding information provided making sure key staff are aware of the risk and need as soon as possible. If the school is the last school that the child attends, we will securely store their safeguarding file until their 26th birthday is reached, when it will be securely disposed of.

Adults who work with children or at our school

Safer recruitment

- 74.** The school expects all staff, volunteers and third parties who spend time at our school to share our commitment to keeping children safe. We have tight and robust recruitment procedures in place to deter, identify and prevent people who are unsuitable to work with children from securing employment or volunteering opportunities at our school. We will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. All offers of employment are conditional upon the successful completion of pre-employment vetting checks that are listed in Part Three of KCSIE.
- 75.** We require written confirmation from third-party and supply staff agencies that they have completed appropriate safer recruitment checks on their employees. We will always check the individual's identification. We will also check the suitability and identification of external visitors and individuals or organisations wishing to hire our site. The headteacher makes the decision on whether a visitor needs to be supervised or escorted.
- 76.** We will make sure safeguarding arrangements are in place to keep children safe when activities or services that take place on our site are not provided by our school or under the direct supervision or management of our staff, regardless of whether the children attending are students at our school or not. We will end our agreement with the individual or provider if they fail to follow the safeguarding requirements listed in the agreement.
- 77.** See our separate safer recruitment and lettings policies for full details of these processes.

Concerns or allegations about adults in our school

- 78.** The school remains vigilant beyond the recruitment and vetting process. We maintain an environment that deters and prevents abuse and challenges inappropriate staff behaviour. This includes creating a culture of openness and transparency so that staff feel comfortable to report staff behaviour that may impact on keeping children safe. The headteacher and chair of governors will receive training on how to manage allegations against adults working at our school.
- 79.** Our staff are trained to identify inappropriate or harmful staff behaviour and the procedures to follow if they have a safeguarding concern about an adult at our school. This includes information about appropriate and inappropriate physical contact between staff and students and the strict conditions under which it is appropriate to restrict a child's movement, use reasonable force or seclude a child from others for safeguarding purposes in line with the [restrictive interventions guidance](#).

80. Staff will report low-level concerns (behaviour that sits outside of the staff code of conduct) and allegations (that a member of staff presents a risk to children) to the headteacher as soon as practically possible. This includes concerns that occurred in school, out of school, online or offline. Staff are always expected to provide a written account of their concern. If the concern is about the headteacher, staff will contact the chair of governors whose details are at the start of this policy.
81. If the staff member feels unable to report to the headteacher or chair of governors, either because they are not available or because they believe that there is a conflict of interest, they will share their concerns with the local authority designated officer (LADO) whose details are at the start of this policy. The LADO is responsible for giving advice and organising the response to concerns that an adult who works with children may have caused them or could cause them harm.
82. The school has separate procedures for dealing with allegations against staff and a low-level concerns procedure.
83. If you have a low-level concern or have an allegation to make about a member of staff presenting a risk to children, contact the headteacher as soon as practically possible. This includes any concerns in school, out of school, online and/or offline. The low level concern will be in the first instance recorded by the Headteacher on My Concern Confide which is our low level tracking system.
84. If the low-level concern or allegation is about the Headteacher, contact the Chair of Governors whose details are at the start of this policy.
85. If you are unable to report to the Headteacher or Chair of Governors, either because they are not available or because you believe that there is a conflict of interest, share your concerns with the local authority designated officer (LADO), whose details are at the start of this policy.
86. The Allegations of Abuse Policy sets out what steps the Headteacher or Chair of Governors will then follow if appropriate.

Whistleblowing

87. A whistleblower is a worker who reports certain types of wrongdoing. All staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. Tiffin Girls' School has a separate whistleblowing policy, which lists the procedures for raising concerns. This is available in the school staffroom, on the Google Drive and is emailed to staff when it is updated.
88. Where staff feel unable to raise a concern with our senior leadership team, or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as the NSPCC whistleblowing advice line. Staff can call 0800 028 0285 from 8am-8pm or email: help@nspcc.org.uk.

Identified areas of risk for our school

89. As a London school, we recognise that our students grow up in a complex and rapidly changing environment which can present particular safeguarding challenges. Our safeguarding practice therefore takes account of both national risks and those arising from our local context, including:
 - Children living and growing up in London
 - Mental health and well-being
 - Online risk and mobile technology
 - Safeguarding risks outlined under the Prevent strategy
 - School located on a very busy road into Kingston with two large adjacent schools

Online safety and the use of smart devices

90. This section summarises The Tiffin Girls' School's whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, Chromebooks, tablets etc). Our detailed approach is covered in the Online Safety Policy and IT Acceptable Use Agreements (appendices to the Online Safety Policy). This policy can be found on the school Google Drive and is emailed to staff when renewed. It is also on the policies page of the school website: <https://www.tiffingirls.org/about-us/policies/>
91. The Tiffin Girls' School understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.
92. Our aim is to:
- Have in place online safety processes that protect our children and staff including how we identify, intervene in and escalate online concerns, where appropriate.
 - Make sure technology is used responsibly and safely through education.
 - Set clear expectations for the use of mobile phones and smart technology.
93. We fulfil our aims by:
- Ensuring appropriate filtering and monitoring systems are in place on the school's network and devices.
 - Educating children to learn how to keep themselves safe when online (using the government's [Teaching online safety in schools](#) guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety.
 - Engaging with parents and carers about what online safety looks like.
 - Making sure our whole school approach is reflected in all relevant policies.
 - Regularly training staff on online safeguarding risks and how to be online safely.
 - Making sure children, staff, parents/carers, governors and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology.
 - Making parents, carers, children and staff aware that staff can search an electronic device they have confiscated. See [Searching, Screening and Confiscation](#).
94. Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.
95. Online safety is an integral part of the School's safeguarding approach. The School recognises four broad areas of online risk: **content**, including exposure to illegal, inappropriate or harmful material such as pornography, discrimination, self-harm, suicide, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation and conspiracy theories; **contact**, including harmful online interaction with other users or generative AI applications that simulate interaction, such as peer pressure, grooming or exploitation for sexual, criminal, financial or other purposes; **conduct**, where a person's online behaviour increases the likelihood of, or causes, harm, including online bullying and the making, sending or receiving of explicit images, including those generated using AI; and **commerce**, including risks such as online gambling, inappropriate advertising, phishing and financial scams. The School seeks to protect students from these risks through a combination of education, clear expectations, effective filtering and monitoring, and appropriate supervision. Students are taught through a progressive online safety curriculum, including PSHE/RSHE and computing, to use technology safely and responsibly, recognise and manage online risks, think critically about online content and emerging technologies such as artificial intelligence, and know how and where to report concerns. The School applies appropriate filtering and monitoring to its network, systems and school-managed devices, regularly reviews their effectiveness, and ensures that concerns identified through monitoring are considered as safeguarding matters and referred to the DSL where appropriate. The safe and appropriate use of mobile phones, smart watches, Chromebooks and other personal devices is governed through the School's Online Safety,

Acceptable Use, Behaviour for Learning and safeguarding arrangements, with all members of the School Community expected to use technology in a way that does not cause harm to themselves or others.

96. We have online safety processes in place that aim to protect children and set clear expectations for the acceptable use of technologies and how we will respond to online safety incidents. We fulfil our aims by:

- making sure our whole school approach is reflected in all relevant policies
- regularly training staff on online safeguarding risks and how to protect children
- making sure children, staff and parents sign an accessible acceptable use agreement that covers our expectations for how they should use the school's IT systems and the consequences for not following the agreement
- educating children to learn how to keep themselves safe when online, what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety
- engaging parents with keeping children safe online and making parents, children and staff aware that staff can search an electronic device they have confiscated
- ensuring appropriate filtering and monitoring systems are in place on the school's network and devices

97. Technology and risks and harms associated with it evolve and change rapidly. We will carry out an annual review of the school's approach to online safety, supported by an annual risk assessment that considers and reflects the risks our students may face. The school's staff code of conduct and online safety policy details acceptable use of technologies.

Mobile phones and smart technology (including smart devices)

98. Our school is a mobile phone-free environment meaning children will not have access to their mobile phone (or other smart technology with similar functions) throughout the school day, including during lessons, the time between lessons and breaktimes. 6th form students are able to use their mobile phones in the 6th form centre and LRC only. There are special circumstances where there are exceptions to this rule, such as if a child requires their mobile phone to monitor a medical need. Staff and visitors are expected to not use personal devices around children, and teaching staff who need to take their mobile phone into the classroom need to ask for permission from their SLT Link.

Media recordings, including audio, images and videos

99. Certain uses of images are necessary for the ordinary running of the School, including for important safeguarding purposes such as identification and security. The legal basis for this is public task as the School is exercising its legal duties to safeguard students. All students are photographed on entering the school at Year 7 and at the start of Year 10 and Year 12 for the purposes of internal identification.

100. Some teaching departments, including PE, Music and Drama, may film students during the course of their lessons for the purpose of teaching and learning. The legal basis for this is public task as the School is fulfilling its core purpose in education. Such images will be stored securely and centrally; they may be shown to students but not shared with them, their parents or anyone else digitally.

- 101.** We will only take or use images, videos or recordings of students where the appropriate consent has been obtained. For students aged under 13, consent will be sought from their parent or carer. For students aged 13 to 15, we will seek consent from both the student and their parent or carer, recognising the student's increasing right to have a say in how their personal information is used. From the age of 16, consent will be sought directly from the student only.
- 102.** We will make sure the child is appropriately dressed.
- 103.** All children are encouraged to tell us if they are worried about any media that has been taken of them. We make careful decisions about how and where we publish images, videos and recordings of children online, recognising the increasing risk that individuals can use artificial intelligence to manipulate the image to cause harm.

Filtering and monitoring systems

- 104.** Our school has strong and effective filtering and monitoring systems in place to help limit children's exposure to online risks from our school's IT systems. In line with the DfE's [Meeting digital and technology standards in schools and colleges](#) guidance, we will make sure that, among other things :
- we assign a member of the senior leadership team and a governor to oversee filtering and monitoring arrangements and ensure that appropriate systems are in place to meet these standards
 - the effectiveness of our filtering and monitoring systems is reviewed at least annually, and more frequently where there is a significant change or issue, led by the designated SLT member responsible for filtering and monitoring, with support from the DSL and our IT support/provider
 - we ensure the our IT Provider check that filtering works across all internet-connected devices and a record is kept of these checks
 - the systems are effective for the number of and age range of our children and consider children who are potentially at greater risk of harm
 - specific staff have assigned roles and responsibilities to manage these systems
 - staff and students know about the systems in place and how to raise concerns
 - when we block online content it does not impact teaching and learning
 - we have monitoring strategies in place that meet our school's safeguarding needs

Generative artificial intelligence

- 105.** Generative artificial intelligence (Gen AI) refers to artificial intelligence that creates new content (e.g. text, code and images). Our school is aware that using Gen AI can be hugely beneficial, but also harmful if used inappropriately. We will use the [Department for Education's advice and guidance on using Gen AI in education](#) to ensure we integrate Gen AI tools safely and with children's best interests at the centre. Safeguarding concerns that arise through an individual's use of artificial intelligence will be responded to in line with our safeguarding policies. Our school's approach to using Gen AI is detailed in our online safety policy that can be found on the school's website.

Remote education

- 106.** We will stay in regular contact with the parent of a student being taught remotely, making sure they are aware of:
- the importance of children being safe online and offering advice on how to do so
 - what systems our school uses to filter and monitor online use
 - what their child is being asked to do online, including the sites they will be asked to access and who from the school their child will be interacting with online

Information security and access management

- 107.** We understand that cyber security is a safeguarding issue, particularly because we hold sensitive data about students and staff. We will take measures to help keep personal information safe, ensuring we have appropriate cyber security systems in place to help protect against cybercrime (i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly). We will follow the government's [Cyber security standards guidance](#). Our systems are reviewed regularly to keep up with the constant changes to cybercrime technologies.

Concerns about nudes or semi-nudes

- 108.** For the purposes of this policy, 'sharing or making nudes and semi-nudes' refers to the creation, sending, or posting of nude or semi-nude images involving young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos, and livestreams, whether taken by the individual, created by another person, digitally altered, or wholly generated using artificial intelligence usually referred to as 'deepfakes'. While statutory child safeguarding definitions apply to individuals under 18, the school owes a continuing duty of care to all enrolled students regardless of age. Any involvement by, or targeting of, enrolled students aged 18 or over in the creation, sharing, or distribution of such content remains strictly prohibited under the school's Duty of Care, Staff Code of Conduct, and Social Media Policy.
- 109.** Our staff will be trained to carefully handle and manage reports of these incidents. Staff reserve the right to confiscate a device in the possession of a child if they have concerns that the device is involved in the sharing or making of nudes or semi-nudes. This is consistent with the [Searching, screening and confiscation: advice for schools](#) guidance. Staff will not view, download, forward or delete illegal images of a child. Staff will be aware of what to do when viewing an image is unavoidable.
- 110.** Incidents will require a proportionate safeguarding response, regardless of whether they are consensual or not, that considers any elements of coercion, exploitation or vulnerability. The DSL will first hold an urgent meeting to establish, among other things, the level of risk to the children involved, if a referral is needed in line with our safeguarding procedures, whether there is a need to view the image to safeguard the child and whether action should be taken to delete or remove the image. The review meeting will likely include the staff member(s) who heard the disclosure and the wider safeguarding team.

111. The decision to view and delete imagery will be based on the professional judgement of the safeguarding team, guidance from the police (where necessary) and in line with the government's [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance.
112. The DSL will make an immediate referral to the police and children's services if:
- the incident involves an adult
 - there is reason to believe that a child or young person has been coerced, blackmailed or groomed or there are concerns about their capacity to consent (for example, owing to special educational needs)
 - what they know about the image suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent
 - the images involves sexual acts and any child in the images or videos is under 13
 - they have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming
 - they become aware of a computer-generated explicit image of a child
113. It will not always be necessary to involve the police or children's services. In these cases, the DSL will be confident that they have enough information to assess the risk to any child involved and that the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support. We may escalate the concern to safeguarding agencies later on as a result of becoming aware of further information or wider concerns.
114. Responding to any incident that comes to your attention:
- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately, using the school's reporting procedures set out in this policy.
 - **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
 - **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
 - **Do not delete** the imagery or ask the young person to delete it.
 - **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a Deputy DSL.
 - **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
 - **Do not** say or do anything to blame or shame any young people involved.
 - **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a Deputy DSL.

Concerns about mental health

115. If staff are concerned that a child's mental health is also a safeguarding concern, they will speak to a member of the safeguarding team as per this policy. We will consider whether support from our team of counsellors/ ELSAs or pastoral team is required and whether the Child and Adolescent Mental Health Service (CAMHS) is necessary. If we feel that a child is in danger, we will call 999 or arrange for the child to be taken to A&E immediately by a parent or other suitable person. If a child

needs help urgently for their mental health, but it's not an emergency, we will seek advice from NHS 111 online or call 111 and select the mental health option.

Concerns about extremism and radicalisation

- 116.** The school complies with the Prevent duty, a legal requirement that obligates agencies including schools to prevent people from becoming terrorists or supporting terrorism. We recognise our role in protecting individuals from extremist ideologies and intervening early to prevent radicalisation. The school undertakes a Prevent duty risk assessment to assess the risk of children being drawn into terrorism, including online, which is informed by the local profile and context.
- 117.** Protecting children from extremism and being drawn into terrorism is treated the same as any other safeguarding harm. Staff will be alert to changes in a child's behaviour which could indicate that a child may be in need of help or protection. They will report any concerns in line with the school's safeguarding procedures detailed above.
- 118.** The DSL will follow the local Prevent referral pathway where they become aware of a Prevent concern. They may first seek advice from the local council's Prevent lead and children's services. If appropriate, they will make a referral to the police Prevent team who will consider with other agencies whether the child would best be supported under the Channel programme. The DSL will report knowledge of online material promoting terrorism or extremism via [the Government's service: Kingston Prevent referral pathway](#)
- 119.** Students will be provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views. We are responsible for the content and messaging delivered to our students. We will ensure that any external speakers, resource materials, or learning tools do not undermine core British values, which include democracy, individual liberty, the rule of law, and mutual respect and tolerance for those with different faiths and beliefs. Promoting these values helps us defend children against extremist ideologies while building a more united and harmonious community.

Child-on-child abuse, including harassment and violence

- 120.** We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen at school, outside of school or online. Staff are made aware of the important role we have to play in preventing child-on-child abuse and responding when we believe a child may be at risk. For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys the instigators, but we make it clear to students that all child-on-child abuse is unacceptable behaviour, we will take it seriously and how they can report to us that they have experienced or witnessed it.
- 121.** We do not downplay any form of child-on-child abuse. Staff are trained to challenge inappropriate behaviour between children that is abusive in nature. Our staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. We all maintain an attitude of 'it could happen here'.

122. Examples of child-on-child abuse can include, but are not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- abuse between children in an intimate relationship (teenage relationship abuse)
- physical assault and harm (including when a child encourages or threatens physical abuse online) or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny/misandry, sexual violence and sexual harassment (such as sexual comments, jokes and online sexual harassment)
- sharing or making of nude and semi-nude images and/or videos including those generated using AI (deepfakes)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals

123. Child-on-child abuse is preventable. The school puts measures in place to minimise the risk of child-on-child abuse, including

- ensuring staff are thoroughly trained to recognise the signs that a child is or may be experiencing it, challenge inappropriate behaviour between children and follow the school's procedures for reporting and responding to it
- creating opportunities in and beyond the curriculum to teach children how to keep themselves and others safe, including how to respect each other, deal with conflict and how they can confidently report inappropriate or abusive behaviour
- having a transparent behaviour policy that makes clear our expectations for behaviour and mutual respect, as well as the procedures for responding to unacceptable or abusive behaviour
- regularly analysing safeguarding data on child-on-child incidents to identify emerging risks and trends for students, particularly children with protected characteristics, taking action to make the school site safer
- being particularly alert to when children might be at highest risk around the school day (for example immediately after school)
- offering regular opportunities to gather feedback from students and their parents about what more we can do to make our school a safer environment for them

Responding to allegations of child-on-child abuse

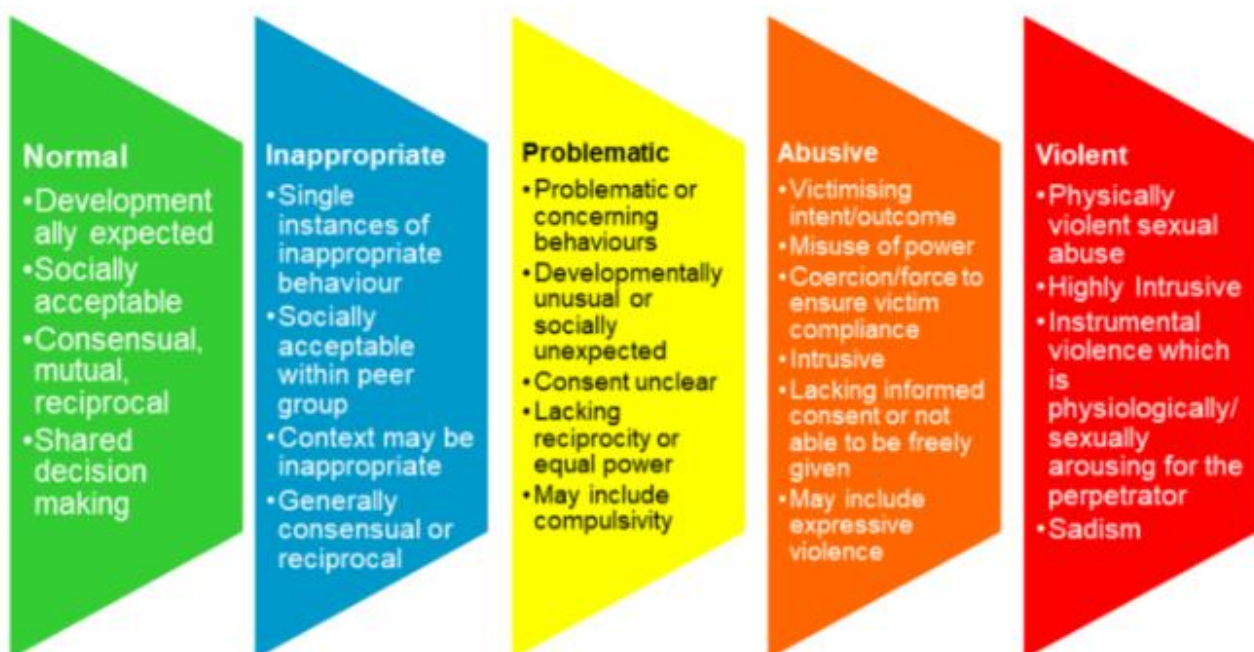
124. Staff will report concerns or confirmed incidents of child-on-child abuse using the school's safeguarding reporting and recording procedures described above. The DSL will determine the best course of action from the available options ranging from internal management of the concern to making a referral to children's services and/or the police. We will inform the police if a criminal offence is committed. The police take a welfare approach to children under the criminal age of responsibility who are alleged to have caused harm. The DSL will work closely with the police to ensure the decisions the school makes to protect children and about discipline does not impact the criminal process.

125. Records will be kept of all concerns, how they were investigated and any outcomes reached on the child's safeguarding file. The DSL will contact the parents of children involved at the earliest opportunity so long as it is appropriate to do so. Where the DSL, children's services and/or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern following our behaviour policy and safeguarding processes.
126. If a safeguarding risk is established, the DSL will assess the necessity of a safety plan or risk assessment in consultation with the external agencies involved. Individual safety plans will be subject to regular monitoring and will include input from both the student concerned and their parents. The course of action taken by the school for each child will be discussed solely with that child's parents.
127. Child-on-child abuse is a safeguarding issue for both children who display the behaviour and the children who are affected by it. Support will be extended to every child affected by the incident.

Harmful sexual behaviour, including harassment and/or sexual violence

128. When responding to harmful sexual behaviour, including sexual harassment and sexual violence, the school follows the guidance set out in Part Five of KCSIE. We treat incidents that occur online or outside the school setting with the same gravity as in-school incidents. All incidents are responded to using the thresholds set out in the [Hackett tool](#), drawing upon the DSL's professional judgement and following local safeguarding procedures:

- **Hackett Inappropriate:** Manage internally using the behaviour policy and pastoral support.
- **Hackett Problematic:** Early help response used for non-violent harmful sexual behaviour to prevent escalation.
- **Hackett Abusive:** Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
- **Hackett Violent:** Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the [When to call the police](#) guidance.



- 129.** Handling cases of harmful sexual behaviour is highly complex. Where appropriate, the DSL will seek the advice of the police and/or children's services to decide next steps and what information can be disclosed to others, in particular the child alleged to have caused harm, their parents and staff. The DSL will also consider which specialist services are best placed to support the children involved.
- 130.** When assessing incidents of harmful sexual behaviour, we will take into account the ages and developmental stages of the children involved. Any power imbalance between children, such as differences in age, maturity, social status and if any of the children have a disability or learning difficulty, will be taken into account. We will consider whether immediate measures need to be put in place to support and protect the children impacted by harmful sexual behaviour, including witnesses and the child who displayed harmful sexual behaviour.
- 131.** An immediate risk and needs assessment will be carried out and recorded following a report of sexual violence and on a case by case basis for reports of sexual harassment. The DSL will regularly review the assessment, using it to inform ongoing safeguarding decisions. At all times, we will be actively considering the risks posed to all students and staff, and put adequate measures in place to protect them and keep them safe. Our risk assessment will support and be informed by risk assessments carried out by other professionals involved.
- 132.** Our staff know to reassure any child who reports they have been a victim of sexual violence or sexual harassment that they will be taken seriously, supported and kept safe. We will further reassure those affected that the law exists to protect children, not criminalise them. Experiencing sexual violence and sexual harassment will, in all likelihood, negatively affect a child's educational attainment and be worsened if the child who caused the abuse attends the same school. We will work hard to minimise the impact on their educational outcomes. Wherever possible, the child, if they wish, will be able to continue in their normal routine. Our priority will be to make the child's daily experience as normal as possible, so that our school is a safe space for them.
- 133.** The school recognises that children who display harmful sexual behaviour may have experienced their own abuse and trauma. At the same time as considering disciplinary action, we will provide the child with, or find, the right support to stop them from re-offending and address any underlying trauma that may be causing their behaviour. In all scenarios, decisions and actions are regularly reviewed and relevant policies are updated to reflect lessons learnt.
- 134.** The school knows that sexual violence and sexual harassment can happen between two children of any age or sex, online or in person. It can occur also through a group of children to a single child or towards another group of children. We will not dismiss sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys", because this can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in the worst case scenario normalise abuse and stop children from coming forward to report it.
- 135.** The management of children and young people with sexually harmful behaviour is complex. The Tiffin Girls' School will work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made and next steps discussed, taking into account the views of those impacted by the behaviour.
- 136.** A risk and needs assessment will be completed for all reports of sexual violence and on a case by case basis for reports of sexual harassment. The assessment, which will be kept under review, will

consider:

- Whether there may have been other people impacted by the behaviour.
- The person known to be impacted by the behaviour, especially their protection and support.
- The alleged instigator of the behaviour.
- All children (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged instigator or future harm.
- The time and location of the incident and any action that can make the school safer.

If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral

- 137.** If the child does not give consent to share information, the DSL or a Deputy DSL will balance the victim's wishes against their duty to protect them and other children on a case by case basis. If a child is at risk of harm, is in immediate danger or has been harmed, a referral must be made to children's services, and as rape, assault by penetration or sexual assault are crimes, reports must be referred to the police. As stated above, a police referral will still be made for children under the age of criminal responsibility.
- 138.** We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up what staff need to know and any support that will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.
- 139.** Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a Deputy DSL will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the CPS: Safeguarding Children as Victims and Witnesses advice.
- 140.** Harmful sexual behaviour exists on a continuum. Our safeguarding team will have a good understanding of harmful sexual behaviour to inform how they respond to concerns, support staff training and work with the PSHE/RSE lead to plan the aspects of the curriculum aimed at preventing harmful sexual behaviour. We will always consider harmful sexual behaviour in a safeguarding context. Staff are made aware of the importance of addressing the early signs of inappropriate sexual behaviour, including misogyny, to prevent it escalating into sexual violence and/or sexual harassment.

If a child has experienced or is at risk of female genital mutilation

- 141.** Female genital mutilation (FGM) involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'. FGM is illegal in England. As with other safeguarding concerns, staff will contact the safeguarding team if they suspect that FGM has been carried out on a child or believe that the child is at risk of FGM.
- 142.** Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should contact the DSL or a Deputy DSL who will support them in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

Specific safeguarding considerations

- 143.** Certain children are at a higher risk of experiencing abuse, whether online or offline, and may face further obstacles in identifying or reporting it. For this reason, there are some circumstances we give a specific safeguarding focus to.

Children potentially at greater risk of harm

Children who need a social worker

- 144.** The school recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm and face additional barriers to attendance, learning, mental health and behaviour. Children may need a social worker to help the family address safeguarding risks or welfare needs. Children's services will tell the school if a student has a social worker. This helps us to make decisions in the child's best interest, such as how we adjust our response to unauthorised absence or the child missing education. We will work with the social worker, the child, and their family when deciding on the extra help we can provide in school to support the child's welfare.

Children looked after and previously looked after

- 145.** Staff will have the skills and knowledge to keep children looked after and previously looked after safe. We will give appropriate staff the information they need in relation to a looked after child, for example their legal status, who has parental responsibility, who is not permitted to have contact, who is not permitted to know where the child is being educated and the level of decision-making power the local authority has given the carer.
- 146.** The school's designated teacher for children looked after, Keith Batchelor, has the training and experience to understand the unique needs of these children and how they can best be supported to have the same opportunities as their peers. This will include the designated teacher working closely with AfC's [Virtual School](#) accessing the training and forums on offer. The designated teacher will also work closely with the children's services and Virtual School involved to put funding to best use to improve the child's educational outcomes. The designated governor for children looked after is Kate Bevan.
- 147.** Kinship carers are family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren't able to. We encourage kinship carers of students to make the school aware of their caring arrangement so we can establish whether there is any support we can offer or seek advice for.
- 148.** Private fostering occurs when a child under 16 (or 18 if disabled) is cared for by someone other than a parent or close relative for 28+ days. By law, those arranging this care must notify children's services as soon as possible. If they haven't, the school has a duty to inform children's services, though we also encourage parents to report it.

Young carers

- 149.** The school is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, academic achievements, behaviour and wellbeing. We aim to identify young carers early so we make sure young carers receive the right support at the right time by the right services. This may include additional support from safeguarding partners, including the local authority and health services.

Children requiring mental health support

- 150.** We have an important role to play in supporting the mental health and wellbeing of our students. Supporting mental wellbeing is a high priority for our school. With the support of the Mental Health Support Team (MHST), our school's mental health lead, Kathy Kilpatrick, has developed a whole school approach to mental health and wellbeing, that aims to build resilience among students and get children the right support and advice.
- 151.** Our staff are aware that mental health problems can develop into safeguarding concerns and

can also be an indicator that a child is experiencing or at risk of experiencing harm. Staff are well placed to observe children day-to-day and identify early those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff are aware that only appropriately trained professionals should attempt to diagnose a mental health problem.

Children with special educational needs, disabilities and health issues

152. Our SENCO and DSL work closely together to safeguard children who have special educational needs and disabilities (SEND), particularly when there is a report of abuse. The school makes sure that staff are aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges, both online and offline, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours, such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand what is happening to them is abuse
- the need for intimate care or that these children are isolated from others, and that these children are more likely to be dependent on adults for care
- issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

153. We will consider additional pastoral support for these children and ensure we put appropriate measures in place to best support communication. We will make a referral to children's services where an incident highlights that a child might be at increased risk of harm because of their medical condition, for example if the child is repeatedly sent to school without essential medication. Usually, we expect a child's reported medical needs to be verified by UK medical professionals.

Children who are absent from education

154. The school recognises issues with attendance can be a warning sign to a range of safeguarding issues and/or worsen existing safeguarding concerns. The school's attendance procedures assist the safeguarding team with identifying and responding to children persistently absent or missing from education, acting early to prevent absent children from becoming a child missing education in the future.

155. Where a parent expresses their intention to educate their child at home (also known as elected home education), we will work together with the parent and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly important for children who have SEND, a social worker and/or other vulnerabilities.

Children who are gender questioning

156. This section applies where a child or their parent has requested that the school make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition").

- 157.** The KCSIE guidance states what our responsibilities are in this area and what we should consider when making decisions about a request, particularly in relation to single-sex sport and spaces and residential accommodation. We will keep a clear record of our decision-making process on My Concern.
- 158.** The school will balance the impact of agreeing the child's request against the impact of refusing their request, taking into account all the relevant factors. We will use our judgment about whether supporting social transition is in the child's best interests and the best interests of other children. We will do this by working together with the child and the child's parents (unless the latter is unsafe to do so), considering clinical evidence or advice and involving the DSL. The DSL will also be involved in cases where a child has socially transitioned but staff and school friends are unaware. We will offer in-school support and signpost to community-based organisations where appropriate or requested.

Discrimination

- 159.** We recognise that discrimination is a harm in its own right. It can cause trauma and negatively impact a child's welfare, wellbeing, sense of belonging and safety. Some students face greater risks of harm or bullying from issues like sexual violence or homophobic, biphobic, transphobic, faith- or race-based discrimination. Children may also be targeted due to their perceived or actual LGBTQ+ identity. We have a duty to protect individuals from and eliminate unlawful discrimination, harassment and victimisation. We prioritise fostering good relations between those who share protected characteristics and those who do not, ensuring equal opportunities for everyone.
- 160.** This is part of the school's duty to promote an inclusive, anti-discriminatory culture as part of our safeguarding responsibilities. This duty is a priority when making policies and decisions that impact our school community. The school works hard to foster a sense of belonging for all students, creating opportunities to celebrate diversity through our curriculum and wider school activities. We know that taking timely action helps prevent concerns from escalating into bullying.
- 161.** We aim to provide a safe, open space for our community to share concerns. Discrimination is firmly addressed under our safeguarding procedures and behaviour policy, and may involve referrals to children's services and/or the police. We will communicate with parents in line with this policy. Support and check-ins will be offered to the student who has been targeted. We challenge discriminatory attitudes, making it clear this behaviour is unacceptable. Students who discriminate against others face clear consequences and receive the support and education they need to reduce the risk of this behaviour happening again. We report all discrimination incidents, including those not involving children, to the local authority termly.

Discrimination Incidents

- 162.** Further procedures for recording, responding to and reporting prejudice-related and discriminatory incidents are set out in the School's Discrimination Incident Policy.

Teaching and learning

- 163.** At The Tiffin Girls' School, we aim to prevent our children from coming to any harm. We recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our curriculum meets the needs of all children, including those with SEND and/or those who have experienced abuse. We address safeguarding topics in all areas of teaching and learning, for example PSHE, SMSC, RSE, assemblies, tutor time, children's health and safety schemes, and student associate

schemes. Staff understand the breadth of safeguarding and their role in keeping children safe. If any students make a disclosure during one of these sessions then colleagues will report this to the DSL team through the My Concern Portal.

- 164.** External speakers and organisations contributing to the curriculum will be subject to appropriate checks and risk assessment. They will be made aware of the School's safeguarding expectations and of the requirement to report any safeguarding disclosure or concern to a member of the safeguarding team.

Embedding Student Safeguarding Awareness in Curriculum

165. This is carried out through:

- Informal conversation
- Tutor briefings and discussions
- Themes in assemblies
- Providing breadth of topics and knowledge (including extremism)
- Briefings for outings, trips and tours
- The implementing of our Online Safety Policy regarding IT acceptable usage policy and by advice on safe IT usage
- Encouraging students to speak out if there is something worrying them, or if they are aware of, or witness something unacceptable, untoward or disturbing
- Ensuring students know what to do if there is someone in the School who is unaccompanied or is not wearing the appropriate lanyard;
- Lectures and talks by external experts in key areas of student safety
- Providing links to online resources, advice and guidance services
- Information around the school, e.g. posters advertising support agencies

- 166.** If specific safeguarding issues arise during the school year, the Headteacher will make sure the curriculum is adapted to cover current issues.

Physical Intervention

- 167.** We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others, and that at all times it must be 'reasonable force'. In these circumstances 'reasonable' means 'using no more force than is needed' to prevent injury to themselves or another person. This is detailed further in the Student Restraint policy.

- 168.** Such events should be recorded and signed by a witness.

- 169.** We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

Attendance

- 170.** The Designated Safeguarding Lead would investigate and refer to the relevant agency, any of the following attendance issues:

- Regular, repeated absence
- Absence of a child who is on a Child Protection plan or a Looked After Child (LAC)
- Absence at the end of a holiday period

- 171.** The school only authorises absences in exceptional circumstances. Please refer to the Attendance Policy.

- 172.** If the school is looking to authorise an absence at a different educational activity we will use the following guidance as a safeguarding framework to consider requests for absence. A student can only be recorded as attending a place for an approved educational activity if:
- the place is somewhere other than the school, another school where the student is registered, or a place where educational provision has been arranged for the student by a local authority under section 19(1) of the Education Act 1996 or sections 42(2) or 61(1) of the Children and Families Act 2014
 - the activity is of an educational nature
 - the school has approved the student's attendance at the place for the activity and
 - the activity is supervised by a person considered by the school to have the appropriate skills, training, experience and knowledge to ensure that the activity takes place safely and fulfils the educational purpose for which the student's attendance has been approved. Supervision means the student is physically supervised by someone who meets this definition.
- 173.** If the school has concerns about the appropriateness of an activity, we will seek advice from the national governing body for the activity. The final decision on approving the activity, however, rests with the school and we will take the effect on the student's general education into account.
- 174.** The school has responsibilities for the safeguarding and welfare of students attending an approved educational activity. The school will need to be satisfied that appropriate measures have been taken to safeguard the student. Schools should ensure that they have in place arrangements whereby the provider of the activity notifies the school of any absence by the student. We will ensure that arrangements are in place for the provider of the activity to notify the school of any absence by the student. We will record any such absence using the relevant absence code.
- 175.** The school will seek the following safeguarding information when making their decision to authorise an absence:
- Is there a named contact at the organisation who will liaise with the school?
 - Is there a Designated Safeguarding Lead or Welfare Officer at the organisation?
 - Is there a Safeguarding Policy in place and the safeguarding procedures meet the standards of the school?
 - Is the organisation affiliated to a national governing body? Additionally, the organisation may be part of a local collective for the activity e.g a sports partnership
- 176.** The school will seek assurances in writing that the above are in place.
- 177.** The admissions team informs the DSL of students leaving the school. The DSL seeks confirmation of the student's destination. Any concerns are referred immediately to the relevant agency.
- 178.** Further detail on school attendance monitoring and procedures can be found in the Attendance policy.

Extended school and off-site arrangements

- 179.** We continue to be responsible for the safety and wellbeing of students who attend an alternative provision. We know that children who attend alternative provisions often have complex needs and we are aware of the additional risk of harm that these children may be vulnerable to. We will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the provision, i.e. checks that we would otherwise perform on our own staff.
- 180.** We follow the [statutory guidance for alternative provision](#) and [Achieving for Children's alternative provision policy](#). The written agreement between the school and the provider will be clear that the provider must inform us of any arrangements that may put the child at risk and where the child is at all times during school hours (including addresses). We will regularly review the placement to satisfy ourselves that it can meet the child's needs. We will carry out an immediate review of the

placement if safeguarding concerns arise and reserve the right to end the arrangement if concerns are not adequately addressed.

- 181.** Where extended school activities are provided and managed by the school, our own safeguarding policies and procedures apply. When our children attend off-site activities, including work experience placements, we will ensure that effective safeguarding arrangements and thorough risk assessments are in place.
- 182.** For visits involving homestays outside of the UK, obtaining criminality information from the DBS regarding hosting adults is not feasible. We will collaborate with our overseas partner schools to ensure a mutual understanding of, and formal agreement on, the safeguarding arrangements established for the trip. If required, we may also reach out to the appropriate foreign embassy or High Commission to explore any viable vetting options for those hosting abroad. Parents will be fully updated on the finalised safety measures.

Health and Safety

- 183.** Our Health and Safety policy, set out in a separate document, reflects the consideration we give to the protection of our students both within the school environment and when away from the school when undertaking school trips and visits – see separate policy.

Site safety

- 184.** The Terrorism (Protection of Premises) Act 2025, commonly known as Martyn's Law, is intended to strengthen protective security and preparedness in public premises, including education settings. The school will continue to review its site security, emergency procedures and critical incident planning, including ensuring that staff and students understand how to respond appropriately to a serious external threat or incident.
- 185.** The school has security measures and response plans in place to keep the site secure and help protect children, staff, volunteers and visitors from external threats to the school.
- 186.** School leaders will organise regular critical incident drills and exercises. These will include staff-only or tabletop exercises, which may take place when students are not on site, as well as planned drills involving students during the school day. This will help ensure that staff and students are appropriately prepared to respond to a critical incident.
- 187.** We will regularly seek the views of students, parents and staff to find out if there are areas of the school site where children feel unsafe or at risk of harm.
- 188.** A member of the senior leadership team will make the police aware if we have information of concern about the local area that could affect students' safety. If we are concerned about areas where gangs or anti-social behaviour are present, we will also inform the local authority's contextual safeguarding team.

Lettings and off-site arrangements

- 189.** When services or activities are provided by the governing body, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are children at our school.
- 190.** To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's Keeping children safe during community activities, after-school clubs and tuition non-statutory guidance. This includes checking that the provider has completed the essential pre-employment

checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well as establish what the arrangements are for the provider to liaise with our school on safeguarding matters. We will terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

Linked policies

191. This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. Other relevant documents include the below policies.

- Artificial Intelligence
- Allegations of Abuse
- Anti-bullying
- Attendance
- Behaviour for Learning
- Curriculum
- Data Protection
- Designated Teacher
- Equality Scheme
- Health & safety
- Lettings
- Mental Health
- Online safety
- Photos and Videos
- Procedure for managing allegations against staff (including low-level concerns)
- Recruitment and Appointments
- Relationship and sex education
- SEND
- Staff Code of Conduct
- Staff Handbook
- Student Restraint Policy
- Student Substance Abuse
- Students with medical conditions
- Supporting children with medical needs
- Suspension and Permanent Exclusion
- Trips
- Whistleblowing

Application and Review of the Policy

192. At The Tiffin Girls' School, we regularly review the effectiveness of what we are doing to keep children safe. This includes reflecting on what we can learn from safeguarding concerns and incidents taking any action needed to improve our practice. The impact of safeguarding policies, systems and processes is kept under continual review. We are open to challenge and actively seek opportunities to learn how we can improve. For example, we

- regularly seek and listen to the views and experiences of students, staff and parents
- utilise safeguarding monitoring visits from governors
- report the impact of our safeguarding arrangements to the board
- undergo external safeguarding reviews
- submit an annual self-audit to the KRSCP
- seek external expert advice to help us make decisions
- review the effectiveness of staff training

193. The policy applies to all staff, governors and visitors to the school. We recognise that safeguarding is the responsibility of all staff within our school.

194. We will ensure that all staff sign a declaration stating they have read the school's Safeguarding Policy and Part 1 of 'Keeping Children Safe In Education' and will abide by this policy and school procedures.

195. We will ensure that all governors confirm that they have read and understood the full version of Keeping Children Safe in Education and this policy

- 196.** We will ensure that all parents and other working partners are aware of our safeguarding policy by publishing it on the school's website, displaying appropriate information in our reception and by raising awareness at initial meetings with parents of new students as well as regular parent- teacher meetings.
- 197.** Where the Governing Board provides services or activities directly under the supervision or management of school staff, the school's arrangements for safeguarding will apply.
- 198.** Where services or activities are provided separately by another body, the Headteacher, on behalf of the Governing Board, will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect students and there are arrangements to liaise with the school on these matters where appropriate.
- 199.** This policy will be reviewed and updated on an annual basis.