Child Protection and Safeguarding Policy

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Key roles and contacts for safeguarding at our setting		
Key Personnel	**Name (s)**	**Telephone No./ contact**
Designated Safeguarding Lead	Debbie McKenzie	Debbie.McKenzie@compass-school.net
Deputy Designated Safeguarding lead(s)	Sally Howells	Sally.Howells@compass-school.net
Senior attendance champion/ lead on the school's leadership team	Sally Howells	Sally.Howells@compass-school.net
Safeguarding Team	Lacey Weeks Luisa Whittick Gemma Allen Lisa Lewry Dennise Renyard Chris Alston Dawn King	dslo@compass-school.net
School's named "Prevent" lead	Sally Howells	Sally.Howells@compass-school.net
Nominated member of Management Committee for safeguarding	Colm McKavanagh	info@compass-school.net
Nominated member of Management Committee for allegations against Head teacher	Colm Mckavanagh	info@compass-school.net

Local Safeguarding Partners and Key Contacts

Service	Contact	Details
Children's Resource Service (CRS) and Early Help – Families First	Southampton City Council	Telephone for professionals: 023 8083 2300
CRS and Early Help online referral form	Southampton City Council	Children's Resource Service Referral Form
Out of Hours Children's Social Care	Southampton City Council	023 8023 3344
Police	Hampshire and Isle of Wight Constabulary	101 (non-emergency) / 999 (emergency)
Local neighbourhood policing team / PCSOs	Hampshire and Isle of Wight Constabulary	Nina Hedley – nina.hedley@hampshire.police.uk Aggie Huber – aggie.huber@hampshire.police.uk Lewis Rutter - lewis.rutter2@hampshire.police.uk
Information Sharing / CPI Forms	Safe4Me	Safe4Me Information Sharing
National Prevent Referral Form	Home Office	National Prevent referral form
Local Authority Designated Officer (LADO)	Jemma Swann	lado@southampton.gov.uk 023 8091 5535 / 07500 952037
Team Manager for Education Access	Eliza Johnson	Eliza.Johnson@southampton.gov.uk
School Attendance and Support Service (SASS)	Southampton City Council	Julie.Stubbington@southampton.gov.uk Stephanie.Brazier@southampton.gov.uk Kerica.Hunt@southampton.gov.uk Sara.Smith@southampton.gov.uk
Lead for Safeguarding in Education Settings	Alison Philpott	Alison.Philpott@southampton.gov.uk
Southampton Safeguarding Children Partnership (SSCP)	Safeguarding Partnership Team Manager	Safeguarding.Partnershipsteam@southampton.gov.uk
Southampton Safeguarding Children Partnership	SSCP Website	Southampton Safeguarding Children Partnership

1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Maintained schools: governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- The Information sharing duty statutory guidance
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence, and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation). This means our Management Committee and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos, or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Management Committee in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Establishing Positive Behaviour for Learning (PBfL)
- Inclusion statement
- Planned programme of relationships, sex, and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice, and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct policy, the role and identity of the designated safeguarding lead (DSL) and Deputy (DDSL) and DSLO's (Designated Safeguarding Lead Officers), Establishing Positive Behaviour for Learning (PBfL) policy and online safety that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring and the safeguarding response to children who go missing from education/who are absent from education.
- The school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the Safeguarding team, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplainable and/or persistent absences from education
    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
    - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation, or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That children may experience prejudice-based harm including racism, faith-based prejudice, and other forms of discrimination. These experiences may affect a child's welfare, wellbeing, mental health, and ability to seek help
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 3 of this policy outlines in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

DSL is a member of the senior leadership team. Our DSL is Debbie McKenzie. DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online..

If the DSL and DDSL are not available or absent, we have cover arrangements in place. This includes:

- Staff can contact a DSLO outside of working hours and during holiday periods by emailing dslo@compass-school.net

The DSL will be given the time, funding, training, resources, and support to:

  - Provide advice and support to other staff on child welfare and child protection matters
  - Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
  - Contribute to the assessment of children
  - Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and DDSL are set out in their job description.

5.3 The management Committee

The Management Committee will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff who work directly with children read at least part 1 of Keeping Safe in Education (KCSIE) and those staff who do not work directly with children read part 1 of KCSIE
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a Management Committee member to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Ensuring that reviews should are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers, and contractors). Appendix 2 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of Management Committee will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate

Section 18.3 of this policy has information on how the Management Committee are supported to fulfil their role.

5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DDSL on this
- Ensuring the relevant staffing ratios are met, where applicable

5.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads, and others.

6. Information sharing

Information sharing is essential to identifying and responding to safeguarding concerns, including abuse, neglect, exploitation and risks to children's welfare. All practitioners must understand their responsibilities for sharing information promptly, lawfully, securely and proportionately to safeguard children and promote their welfare.

The Department for Education's statutory guidance, Information sharing to safeguard children and young people, updated in September 2026, must inform decisions about sharing information. This should be read alongside Keeping Children Safe in Education 2026 (KCSIE), Working Together to Safeguard Children, the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR).

The new statutory information-sharing duty under section 16LA of the Children Act 2004, introduced by the Children's Wellbeing and Schools Act 2026, came into force on 30 September 2026. Relevant practitioners and organisations must understand and comply with the duty where it applies. The duty strengthens expectations around sharing relevant information to support safeguarding and promote children's welfare. It does not remove the need to comply with data protection legislation or assess whether a particular disclosure is relevant and proportionate.

Information-sharing principles and responsibilities

The DPA 2018 and UK GDPR do not prevent information sharing where there is a lawful basis to do so for safeguarding purposes. Fears about data protection, confidentiality or obtaining consent must not be allowed to prevent necessary and timely action to protect a child.

Information sharing is vital in identifying and tackling all forms of abuse, exploitation and neglect. Education settings are often well placed to identify concerns early and contribute to effective multi-agency safeguarding arrangements. Leaders, governing bodies and proprietors must ensure that staff understand their responsibilities and that information-sharing procedures are included in safeguarding policies and staff training.

Practitioners must understand the seven golden rules for information sharing set out in the government's guidance and apply them alongside the new statutory duty where relevant. In practice, this means:

- Being open and honest with children and families about how information may be shared, wherever it is safe and appropriate to do so.
- Sharing information when necessary and lawful to safeguard a child, without delaying action while seeking consent where this could place a child at risk.
- Seeking advice from the designated safeguarding lead, deputy DSL or DSLO when uncertain, without delaying urgent protective action.

- Sharing information that is relevant, adequate, accurate, up to date and proportionate to the safeguarding purpose.
- Sharing information securely and only with those who need it for a legitimate safeguarding purpose.
- Recording decisions to share or not to share information, including the rationale, actions taken and relevant consent position.
- Considering the safety and welfare of the child and others before disclosing information, particularly where disclosure could increase the risk of harm.

Consent, data protection and serious harm

Practitioners must understand the lawful bases and relevant processing conditions under the UK GDPR and DPA 2018 that permit information to be processed and shared for safeguarding purposes. This includes appropriate conditions for processing special category personal data, such as information concerning health, where the relevant legal requirements are met.

Information may be shared without consent where there is a lawful basis and sharing is necessary and proportionate to safeguard a child. This may include circumstances where consent cannot reasonably be obtained, obtaining consent is not practicable, seeking consent could place a child or another person at risk, or delay could compromise safeguarding action. The absence of consent does not, by itself, prevent lawful information sharing.

Practitioners must not assume that all safeguarding information can automatically be shared. They must consider the purpose of the disclosure, the information required, the applicable lawful basis and any relevant legal restrictions.

Schools must also consider whether disclosure could place a child at risk of serious harm. Where the relevant serious harm test and statutory provisions apply, information must be withheld as required by law. For example, this may be relevant where a child is living in a refuge or emergency accommodation and disclosure could compromise their safety or location. Decisions must be based on the circumstances of the individual case. Where there is uncertainty, appropriate legal or data protection advice should be sought and the decision recorded.

The Management Committee must ensure that personal information is processed fairly and lawfully, stored securely and accessed only by those who need it. Staff must follow the organisation's data protection, confidentiality, information security and safeguarding procedures.

Recording information-sharing decisions

All safeguarding concerns, discussions, decisions and actions must be recorded accurately and promptly in the school's safeguarding or concerns-recording system. Records should include, where appropriate:

- The concern and purpose of the information sharing.
- What information was shared, with whom and when.
- The rationale and applicable lawful basis for sharing.
- Whether consent was sought or obtained, or why consent was not sought or was not required.
- Any decision not to share information and the reasons for that decision.
- Advice received, referrals made, agreed actions and follow-up arrangements.

Records must be stored securely, with access restricted on a need-to-know basis. Safeguarding discussions between professionals and between education settings should support a shared understanding of concerns, relevant context, risk and support needs. The purpose, outcome and resulting actions of these discussions must be recorded.

Transfer of child protection, welfare and educational records

When a child leaves a school or college, the DSL, DDSL and DSLO must ensure that the child protection file is transferred to the receiving school or college as soon as possible, securely and separately from the main pupil file. Confirmation of receipt must be obtained and retained. Transfer and retention must comply with current statutory guidance and applicable Southampton City Council (SCC) procedures.

The receiving setting must ensure that its DSL and, where appropriate, its special educational needs coordinator (SENCO) or the person responsible for overseeing special educational needs in a college or other provider receives and reviews the relevant information. The DSL, DDSL or DSLO must ensure that information is disseminated to staff who need it to safeguard and support the child.

Southampton City Council's published Guidance on the Retention and Transfer of Child Protection Records for Education provides local guidance on transferring child protection, child welfare and learning records.

The DSL, DDSL, DSLO or SENCO should also consider whether it is necessary and proportionate to share relevant information with the receiving school or college before the child leaves. Early sharing may be necessary to ensure that safeguarding arrangements and appropriate support are in place from the child's first day, particularly where there are current safeguarding concerns, a history of abuse or significant welfare or educational needs. The rationale for sharing or not sharing information, including the relevant lawful basis and consent position where appropriate, must be recorded.

Sharing welfare, SEND and educational information

Southampton City Council recognises the importance of sharing relevant child welfare and educational information to promote continuity of support, early intervention and positive outcomes for children and young people.

Where necessary and lawful, information passed to a receiving setting should include relevant information about:

- Early help, welfare concerns and support provided below statutory child protection or child-in-need thresholds.
- Special educational needs and disabilities (SEND), assessments, identified needs and existing support arrangements.
- Academic progress, educational development and previous assessments or interventions.
- Relevant mental health, emotional well-being, pastoral and wider support needs.
- The outcomes of previous assessments, including where no additional support was recommended.

Sharing relevant information and assessment outcomes can help receiving settings understand a child's needs, avoid unnecessary duplication of assessments and ensure appropriate support is available promptly. It can also help identify unmet needs and reduce the risk of educational neglect.

Information must be accurate, relevant, proportionate and shared in accordance with the applicable legal requirements. The transfer of welfare and educational information does not mean that every record must automatically be disclosed. Practitioners must consider the purpose of sharing, the child's needs, consent where relevant and the applicable lawful basis.

Training, oversight and further guidance

The Management Committee along with the Headteacher must ensure that staff receive appropriate safeguarding and information-sharing training and understand how to apply the relevant statutory duties and guidance in practice. Staff must know how to raise concerns, consult the DSL, DDSL or DSLO to record decisions and share information with relevant agencies when required.

Further guidance is available from:

- Department for Education — Information sharing to safeguard children and young people (September 2026)
- Department for Education — Keeping Children Safe in Education 2026
- Southampton City Council — Guidance on the Retention and Transfer of Child Protection Records for Education

Effective information sharing is a shared safeguarding responsibility. All decisions must be guided by the child's safety, welfare and best interests, supported by timely action, lawful and proportionate information sharing, secure record keeping and effective partnership working.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation, and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent, and/or harmful behaviours
- Is bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers, and Management Committee must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL).'

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the Safeguarding Triage as soon as possible if you make a referral directly.

More information can be found here The Children's Resource Service

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

- Liaise with the Safeguarding team via the Safeguarding triage system
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and inform safeguarding triage as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation, and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to Safeguarding Triage if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs."

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation.'

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 3 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the Safeguarding Triage and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to Safeguarding Triage and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to Safeguarding triage and follow our local safeguarding procedures.

Harmful practices – Female genital mutilation (FGM)

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the Safeguarding triage first to agree a course of action.

If in exceptional circumstances the DSL, DDSL and DSLO are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with Safeguarding Triage as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with Safeguarding triage as soon as possible

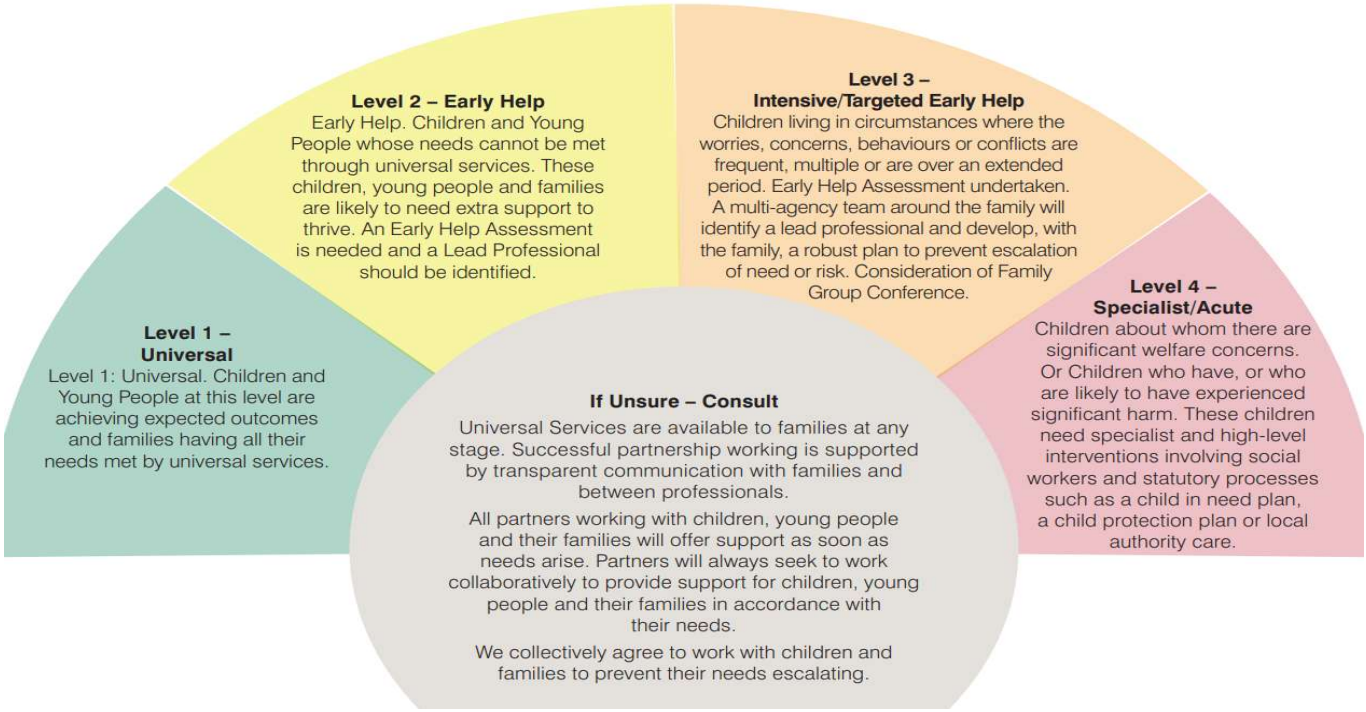
Early/Family Help assessment

If an assessment is appropriate, the DSL, DDSL or DSLO will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL, DDSL and DSLO team will keep the case under constant review, and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Family Help for families



Southampton Pathways Document

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL, DDSL or DSLO will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the Safeguarding Triage as soon as possible.

The local authority should decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL, DDSL or DSLO who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL, DDSL or DSLO who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

The Children's Resource Service

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the Safeguarding Triage team first to agree to a course of action.

If in exceptional circumstances the DSL, DDSL or DSLO is not available, this should not delay appropriate action being taken - seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform Safeguarding triage as soon as practically possible after the referral.

Prevent

Where there is a concern, the DSL, DDSL or DSLO will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and Management Committee can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

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

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to Safeguarding Triage to agree a course of action.

mental health and behaviour in schools

7.7 Concerns about a staff member, supply teacher, trainee teacher, volunteer, or contractor

If an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer, or contractor) posing a risk of harm to children (meeting the harm threshold), speak to the headteacher without delay. If the allegation is about the headteacher, speak to the Chair of the Management Committee.

If you have a low-level of concern about a member of staff (a concern that does not meet the harm threshold), report this to the Headteacher. Whichever nominated person receives a low-level concern, it will always be shared with the headteacher in a timely manner according to the nature of each particular low-level concern, and the headteacher will be the ultimate decisionmaker. However, depending on the nature of the low-level

concern, the headteacher may wish to consult with the designated safeguarding lead (DSL) and take a more collaborative decision-making approach.

If the low-level concern is about the headteacher, report it to the chair of Management Committee.

The headteacher/chair of Management will then follow the procedures set out in appendix 2, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer, or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter," "just having a laugh," "part of growing up", or "boys being boys", as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's Establishing Positive Behaviour for Learning (PBfL) policy but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

See appendix 3 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and report via Safeguarding triage but do not investigate it
- The DSL, DDSL or DSLO will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL, DDSL or DSLO will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL, DDSL or DSLO will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making, or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:

    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - If they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to Safeguarding triage if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s), and friends from either side
    - That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL, DDSL and DSLO will take the lead role in any action in line with our graduated response of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Unsubstantiated, unfounded, false, or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or person who made the report is in need of help or may have been abused by someone else, or the report may have been a cry for help. In such circumstances, aa referral to local authority children's social care may be appropriate
- Shown to be deliberately false or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it in line with the school's Establishing Positive Behaviour for Learning (PBfL) policy

7.9 Making or sharing of nudes and semi-nudes

guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the Safeguarding triage team)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the Safeguarding Triage team

Initial review meeting

Following a report of an incident, the DSL, DDSL or DSLO will complete an initial review appropriate school staff – this may include the staff member who reported the incident and the safeguarding team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response

- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL, DDSL or DSLO will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 3 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL, DDSL or DSLO knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL, DDSL or DSLO has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, DDSL or DSLO in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL, DDSL or DSLO will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL, DDSL or DSLO will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through Contact us | Hampshire and Isle of Wight Constabulary

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our [PSHE and relationships and sex education. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered

- The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to make, provide (or forward) such images
- The receipt of such images

This policy on the making or sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

8. Online safety

Compass School understands that using online services is an important aspect of raising educational standards, promoting pupil achievement, and enhancing teaching and learning. The use of online services is embedded throughout the school; therefore, there are a number of controls in place to ensure the safety of pupils and staff.
The breadth of issues classified within online safety is considerable, but they can be categorised into four areas of risk:

- Content: Being exposed to illegal, inappropriate or harmful material, e.g., pornography, racism, misogyny, self-harm and suicide, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation and conspiracy theories.
- Contact: Being subjected to harmful online interaction with other users or generative AI applications that simulate harmful interaction, e.g., peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.
- Conduct: Online behaviour that increases the likelihood of, or causes, harm, e.g., making, sending and receiving explicit images, including self-generated intimate images and/or videos and content generated or altered using AI (including deepfakes), and online bullying.
- Commerce: Risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Conduct: Online behaviour that increases the likelihood of, or causes, harm, e.g., making, sending and receiving explicit images, including self-generated intimate images and/or videos and content generated or altered using AI (including deepfakes), and online bullying.

The DSL and DDSL will be responsible for:

- Taking the lead responsibility for online safety in the school.
- Undertaking training so they understand the risks associated with online safety
- Liaising with relevant members of staff on online safety matters.
- Ensuring online safety is recognised as part of the school's safeguarding responsibilities and that a coordinated approach is implemented.
- Establishing a procedure for reporting online safety incidents and inappropriate internet use, both by pupils and staff, and ensuring all members of the school community understand this procedure.
- Understanding the filtering and monitoring processes in place at the school.
- Organising engagement with parents to keep them up to date with current online safety issues and how the school is keeping pupils safe.
- Ensuring that all safeguarding training given to staff includes an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring systems at the school.
- Maintaining detailed, secure and accurate written records of reported online safety concerns as well as the decisions and whether or not referrals have been made.
- Understanding the purpose of record keeping.
- Monitoring online safety incidents to identify trends and any gaps in the school's provision and using this data to update the school's procedures.
- Reporting to the Management Committee about online safety on a termly basis.

Network technicians will be responsible for:

- Providing technical support in the development and implementation of the school's online safety policies and procedures.
- Implementing appropriate security measures as directed by the headteacher.
- Ensuring that the school's filtering and monitoring systems are updated as appropriate.

All staff members will be responsible for:

- Taking responsibility for the security of ICT systems and electronic data they use or have access to.
- Modelling good online behaviours.
- Maintaining a professional level of conduct in their personal use of technology.
- Having an awareness of online safety issues.
- Ensuring they are familiar with, and understand, the indicators that pupils may be unsafe online.
- Reporting concerns in line with the school's reporting procedure.
- Where relevant to their role, ensuring online safety is embedded in their teaching of the curriculum.

Managing online safety

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues affecting young people, particularly owing to the rise of social media and the increased prevalence of children using the internet.
The headteacher has overall responsibility for the school's approach to online safety, with support from a DSL, DDSL and DSLO where appropriate, and will ensure that there are strong processes in place to handle any concerns about pupils' safety online. A DSL, DDSL and DSLO should liaise with the police or children's social care services for support responding to harmful online sexual behaviour.

The importance of online safety is integrated across all school operations in the following ways:

- Staff and the Management Committee receive regular training
- Staff receive regular email updates regarding online safety information and any changes to online safety guidance or legislation
- Online safety is integrated into learning throughout the curriculum
- School website page is regularly updated .

The victim of online harmful sexual behaviour may ask for no one to be told about the abuse. The A DSL, DDSL and DSLO will consider whether sharing details of the abuse would put the victim in a more harmful position, or whether it is necessary in order to protect them from further harm. Ultimately the DSL, DDSL and DSLO will balance the victim's wishes against their duty to protect the victim and other young people. The DSL, DDSL and DSLO and other appropriate staff members will meet with the victim's parents to discuss the safeguarding measures that are being put in place to support their child and how the report will progress. Confidentiality will not be promised, and information may be still shared lawfully, for example, if the DSL decides that there is a legal basis under UK GDPR such as the public task basis whereby it is in the public interest to share the information. If the decision is made to report abuse to children's social care or the police against the victim's wishes, this must be handled extremely carefully – the reasons for sharing the information should be explained to the victim and appropriate specialised support should be offered.

Concerns regarding a staff member's online behaviour are reported to the headteacher, who decides on the best course of action in line with the relevant policies. If the concern is about the headteacher, it is reported to the chair of Management Committee

Cyberbullying

Cyberbullying can include, but is not limited to, the following:

- Threatening, intimidating or upsetting text messages
- Threatening or embarrassing pictures and video clips sent via mobile phone cameras
- Silent or abusive phone calls or using the victim's phone to harass others, to make them think the victim is responsible
- Threatening or bullying emails, possibly sent using a pseudonym or someone else's name
- Unpleasant messages sent via instant messaging
- Unpleasant or defamatory information posted to blogs, personal websites and social networking sites, e.g., Facebook
- Abuse between young people in intimate relationships online i.e., teenage relationship abuse
- Discriminatory bullying online i.e., homophobia, racism, misogyny/misandry.

Cyberbullying against pupils or staff is not tolerated under any circumstances.

Child-on-child abuse (including harassment and violence)

All staff will be aware of the indicators of abuse, neglect and exploitation and understand where the risk of such harms can occur online. Staff will understand that child-on-child abuse can occur both in and outside of school, off and online, and that pupils may be less likely to report concerning online behaviour.
Staff will be alert to harmful online sexual behaviour, including sexual harassment, sexual violence, coercive or controlling behaviour, misogynistic or misandrist messages, the non-consensual sharing of self-generated intimate images and/or videos, including those generated or altered using AI (e.g. deepfakes), and the sharing of abusive images or pornography with people who do not want to receive such content.

- The school will maintain a zero-tolerance approach to sexually harassing or abusive behaviour and will not dismiss such behaviour as 'banter', 'just having a laugh' or harmless. Staff will understand that allowing such behaviour to continue can normalise abuse and discourage reporting.
- The school will respond to all concerns regarding online child-on-child abuse, regardless of whether the incident took place on school premises, outside school or using school-owned or personal equipment. Concerns will be reported to the DSL/DDSL/DSLO and managed in line with the Child Protection and Safeguarding Policy.

- Where nudes or semi-nudes involving children are reported, the school will follow the Child Protection and Safeguarding Policy and relevant DfE/UKCIS guidance. Staff will not promise confidentiality and will ensure that the child is supported and not unnecessarily criminalised.

Grooming and exploitation

Grooming is defined as the situation whereby an adult builds a relationship, trust and emotional connection with a child with the intention of manipulating, exploiting and/or abusing them.
Staff will be aware that grooming often takes place online and that pupils who are being groomed are commonly unlikely to report this behaviour for many reasons, e.g., the pupil may have been manipulated into feeling a strong bond with their groomer and may have feelings of loyalty, admiration, or love, as well as fear, distress and confusion.
Due to the fact pupils are less likely to report grooming than other online offences, it is particularly important that staff understand the indicators of this type of abuse. The DSL and DDSL will ensure that online safety training covers online abuse, the importance of looking for signs of grooming, and what the signs of online grooming are, including:

- Being secretive about how they are spending their time online.
- Having an older boyfriend or girlfriend, usually one that does not attend the school and whom their close friends have not met.
- Having money or new possessions, e.g., clothes and technological devices, that they cannot or will not explain.

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Although CSE often involves physical sexual abuse or violence, online elements may be prevalent, e.g., sexual coercion and encouraging children to behave in sexually inappropriate ways through the internet. In some cases, a pupil may be groomed online to become involved in a wider network of exploitation, e.g., the production of child pornography or forced child prostitution and sexual trafficking.
CCE is a form of exploitation in which children are forced or manipulated into committing crimes for the benefit of their abuser, e.g., drug transporting, shoplifting and serious violence. While these crimes often take place in person, it is increasingly common for children to be groomed and manipulated into participating through the internet.

Radicalisation
Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. This process can occur through direct recruitment, e.g., individuals in extremist groups identifying, targeting and contacting young people with the intention of involving them in terrorist activity, or by exposure to violent ideological propaganda. Children who are targets for radicalisation are likely to be groomed by extremists online to the extent that they believe the extremist has their best interests at heart, making them more likely to adopt the same radical ideology.
Staff members will be aware of the factors which can place certain pupils at increased vulnerability to radicalisation, as outlined in the Prevent Policy. Staff will be expected to exercise vigilance towards any pupils displaying indicators that they have been, or are being, radicalised.
Where staff have a concern about a pupil relating to radicalisation, they will report this to the DSL without delay, who will handle the situation in line with the Prevent Policy.

Mental health

Staff will be aware that online activity both in and outside of school can have a substantial impact on a pupil's mental state, both positively and negatively. The DSL and DDSL will ensure that training is available to help ensure that staff members understand popular social media sites and terminology, the ways in which social media and the internet in general can impact mental health, and the indicators that a pupil is suffering from challenges in their mental health.

Online hoaxes and harmful online challenges

For the purposes of this policy, an **"online hoax"** is defined as a deliberate lie designed to seem truthful, normally one that is intended to scaremonger or to distress individuals who come across it, spread on online social media platforms.
For the purposes of this policy, **"harmful online challenges"** refers to challenges that are targeted at young people and generally involve users recording themselves participating in an online challenge, distributing the video through social media channels and daring others to do the same. Although many online challenges are harmless, an online challenge becomes harmful when it could potentially put the participant at risk of harm, either directly as a result of partaking in the challenge itself or indirectly as a result of the distribution of the video online – the latter will usually depend on the age of the pupil and the way in which they are depicted in the video.
Where staff suspect there may be a harmful online challenge or online hoax circulating amongst pupils in the school, they will report this to the DSL immediately.
The headteacher will conduct a case-by-case assessment for any harmful online content brought to their attention, establishing the scale and nature of the possible risk to pupils, and whether the risk is one that is localised to the school or the local area, or whether it extends more widely across the country. Where the harmful content is prevalent mainly in the local area, the headteacher will consult with the LA about whether quick local action can prevent the hoax or challenge from spreading more widely.

Prior to deciding how to respond to a harmful online challenge or hoax, the headteacher will decide whether each proposed response is:

- In line with any advice received from a known, reliable source, e.g., the UK Safer Internet Centre, when fact-checking the risk of online challenges or hoaxes.
- Careful to avoid needlessly scaring or distressing pupils.
- Not inadvertently encouraging pupils to view the hoax or challenge where they would not have otherwise come across it, e.g., where content is explained to younger pupils but is almost exclusively being shared amongst older pupils.
- Proportional to the actual or perceived risk.
- Helpful to the pupils who are, or are perceived to be, at risk.
- Appropriate for the relevant pupils' age and developmental stage.
- Supportive

Where the headteacher's assessment finds an online challenge to be putting pupils at risk of harm, they will ensure that the challenge is directly addressed to the relevant pupils, e.g., those within a particular age range that is directly affected or individual pupils at risk where appropriate.

The headteacher will only implement a school-wide approach to highlighting potential harms of a hoax or challenge when the risk of needlessly increasing pupils' exposure to the risk is considered and mitigated as far as possible.

Cyber-crime

Cyber-crime is criminal activity committed using computers and/or the internet. There are two key categories of cyber-crime:

- **Cyber-enabled** – these crimes can be carried out offline; however, are made easier and can be conducted at higher scales and speeds online, e.g., fraud, purchasing and selling of illegal drugs, and sexual abuse and exploitation.
- **Cyber-dependent** – these crimes can only be carried out online or by using a computer, e.g., making, supplying or obtaining malware, illegal hacking, and 'booting', which means overwhelming a network, computer or website with internet traffic to render it unavailable.

The school will factor into its approach to online safety the risk that pupils with a particular affinity or skill in technology may become involved, whether deliberately or inadvertently, in cyber-crime.

The headteacher will ensure that pupils are taught, throughout the curriculum, how to use technology safely, responsibly and lawfully.

The school is committed to robust cyber awareness for pupils and staff to ensure that they understand the basics of cyber security and protecting themselves from cybercrime.

The school will implement its cyber security strategy in line with the DfE's 'Cyber security standards for schools and colleges and the Cyber Security Policy.

Online safety training for staff

Training will include recognition of AI-generated or digitally altered harmful imagery, deepfakes, online grooming and exploitation, harmful online communities, misogynistic or violent online content, cybercrime, misinformation and disinformation, and routes for reporting concerns.

All staff will understand that pupils are at risk of abuse and other harms by peers and adults online as well as in person, and that harm may take place concurrently through online and offline channels.

All staff will be required to complete the school's annual safeguarding/online safety training and relevant updates during the year.

The DSL and DDSL will ensure that all safeguarding training given to staff includes online safety, including how the internet and digital technologies can facilitate abuse and exploitation, emerging AI-related safeguarding risks, and the expectations, roles and responsibilities relating to filtering and monitoring systems.

Online safety and the curriculum

Online safety is embedded throughout the curriculum in all subjects and is particularly addressed through Relationships, Sex and Health Education, Social, Physical, Intellectual, Creative and Emotional education, Personal, Social, Health and Economic Education, and Computing.

- The school will implement the revised Relationships Education, RSE and Health Education statutory guidance from 1 September 2026, including age- and stage-appropriate teaching about online harms.
- Pupils will be taught about online harms including sharing images, the prevalence and harms of deepfakes, pornography, misogynistic and violent online content, misinformation and disinformation, and when and where to seek help.
- Pupils will be taught the underpinning knowledge and behaviours that enable them to navigate the online world safely and confidently, regardless of the device, platform or app they use. This includes evaluating online information, recognising persuasion and manipulation, understanding acceptable and unacceptable behaviour, identifying risks, protecting personal information, understanding the consequences of sharing material, and knowing how and when to seek support.

Teaching will be age- and developmentally appropriate and will take account of pupils with SEND and other vulnerabilities.

The curriculum will be reviewed in response to emerging risks and relevant incidents.

The DSL will be involved in the development of the online safety curriculum. Pupils will be consulted where appropriate because of their knowledge of the websites, platforms and behaviours used by them and their peers.

Use of technology in the classroom
A wide range of technology will be used during lessons, including the following:

- Computers
- Laptops
- Tablets
- Intranet
- Email

- Cameras

Prior to using any websites, tools, apps or other online platforms in the classroom, or recommending that pupils use these platforms at home, the class teacher will review and evaluate the resource. Class teachers will ensure that any internet-derived materials are used in line with copyright law.
Pupils will be supervised when using online materials during lesson time – this supervision is suitable to their age and ability.

Use of smart technology and mobile phones
The school recognises that smart technology can have educational benefits but also presents safeguarding, behaviour and wellbeing risks.
The school will operate as a mobile phone-free environment by default, in accordance with the DfE statutory guidance 'Mobile phones in schools'. The school's Behaviour Policy/mobile phone arrangements will set out the practical rules, exceptions, reasonable adjustments and consequences for non-compliance.
The prohibition applies throughout the school day, including lessons, the time between lessons, breaktimes and lunchtime, unless an agreed exception applies.

- The same approach will apply to other smart technology with similar functionality where the school determines that it presents equivalent risks.
- Pupils will be taught about the risks associated with mobile phones and smart technology, including distraction, bullying, harmful content, image-sharing and privacy risks.
- Inappropriate use may include sexual harassment, bullying, trolling or intimidation; sharing nudes or semi-nudes, including AI-generated or altered imagery; viewing or sharing pornography or other harmful content; and recording or distributing material without consent.

Staff will use smart technology and personal devices in line with the Staff ICT Policy and Staff Code of Conduct.

The school will keep its arrangements under review as devices, platforms, apps, AI tools and associated threats develop.

The school will consider the 4Cs (content, contact, conduct and commerce) when educating pupils about online risk and when responding to incidents.

Use of AI

As AI tools become increasingly common in education and the workplace, the school recognises that they are a valuable tool for saving time, generating ideas and supporting teaching and administration. However, they must always be used safely, responsibly and with professional judgement.
Pupils are not allowed access to AI platforms at all in school and staff have been issued with guidance on how to use AI safely

The final responsibility for anything produced using AI remains with the member of staff using it.

AI can be used for:

- Generating ideas for lessons, activities, starters, quizzes and revision tasks
- Creating lesson plans and teaching resources
- Adapting resources for different levels or abilities
- Generating examples, questions, scenarios or explanations to support teaching
- Helping to draft routine communications, such as letters or general information for parents and carers
- Supporting administrative tasks, such as creating templates, checklists or timetables
- Proofreading, improving the clarity of or restructuring text that you have written
- Generating ideas for displays, assemblies and enrichment activities.
- Supporting professional development, research and brainstorming

AI must NOT be used to:

- Enter confidential, sensitive or personally identifiable information about pupils, families or staff into an AI tool
- Enter any information about safeguarding concerns, SEND, medical needs, behaviour incidents, attendance, child protection matters or other sensitive pupil information into AI tools
- Make decisions about pupils, including decisions relating to safeguarding, behaviour, SEND, assessment, progress or support
- Replace professional judgement or the teacher–pupil relationship
- Produce or send communications containing inaccurate or unverified information
- Generate reports, assessments or professional judgements about pupils without the staff member checking and taking responsibility for the content
- Use AI-generated content without checking it for accuracy, bias, appropriateness and suitability for our pupils
- Upload copyrighted or confidential school materials to AI tools where we do not have permission to do so
- Use AI to create work that is presented as entirely our own when disclosure or acknowledgement is required
- Use AI in a way that breaches examination, coursework or assessment regulations

Educating parents and carers

The school will work in partnership with parents and carers to help pupils stay safe online at school and at home. Parents and carers will be provided with information about the school's approach to online safety and their role in protecting children.

Parents and carers will be made aware of risks including child sexual abuse and grooming; radicalisation and extremist content; sharing nudes or semi-nudes; AI-generated or altered sexual imagery and deepfakes; cyberbullying; pornography; harmful online communities and content; misinformation and disinformation; and online exploitation.

- Parents and carers will be informed about ways to reduce risks at home, including parental controls, age-appropriate settings, privacy settings, device security and having regular conversations about online activity.
- The school will signpost parents and carers to current DfE and other trusted guidance, including the government's online safety and mobile phone resources.
- Parental awareness will be raised through twilight training sessions, newsletters, online resources, individual advice and guidance conversations and targeted communication following significant incidents or emerging risks.

Filtering and monitoring online activity

The Management Committee has overall strategic responsibility for ensuring that appropriate filtering and monitoring systems are in place and that their effectiveness is reviewed at least once every academic year.

A named member of the senior leadership team, the DSL and relevant IT support will have clearly defined operational responsibilities for filtering and monitoring, with the responsible governor receiving appropriate assurance.

Compass School uses Smoothwall for filtering and monitoring. The school will ensure that filtering and monitoring are appropriate to pupils' age, risk profile, SEND/EAL needs, technology use and curriculum requirements, and that they do not unreasonably restrict teaching and learning.

The annual review will consider all school-managed internet-connected devices and relevant locations, including devices used off-site, BYOD arrangements where applicable, user-group profiles, safe-search arrangements, AI and generative-AI use, technical limitations and recent safeguarding incidents.
The school will keep a written record of the annual review and of routine checks, including when checks took place, who completed them, what was tested and any actions arising.

Monitoring arrangements will include regular review of monitoring reports, with weekly monitoring reports as a minimum and immediate escalation of high-risk safeguarding, malicious or technical incidents.
Requests to change filtering will be directed to the headteacher. The Network technician and DSL will complete a risk assessment before significant changes, and changes will be recorded.

All users will be informed about filtering and monitoring and why it is in place. Concerns identified through monitoring will be reported to the DSL and managed under the Child Protection and Safeguarding Policy.

Where illegal material is accessed, the school will follow the Child Protection and Safeguarding Policy and report to the appropriate agency, as required.

ICT technicians will undertake routine checks, with frequency determined by the school's risk assessment, and will work with the DSL/DDSL to investigate alerts and incidents.

Network security

Technical security features, such as anti-virus software, will be kept up-to-date and managed by Network technician. Firewalls will be switched on at all times. Network technician will review the firewalls on a weekly basis to ensure they are running correctly, and to carry out any required updates.

Staff and pupils will be advised not to download unapproved software or open unfamiliar email attachments and will be expected to report all malware and virus attacks to Network technician.
Users will be required to lock access to devices and systems when they are not in use.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils, and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Compass School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Compass School will treat any use of AI to access harmful content or bully pupils in line with this policy and our artificial intelligence] policy.
Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE).

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL, DDSL or DSLO will normally do this in the event of suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the Safeguarding Triage team

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL, DDSL or DSLO will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities, or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation, and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally 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 that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

Any abuse involving pupils with SEND will require close liaison the SENCO. The school consider extra pastoral support and attention for these children and ensure any appropriate support for communication is in place. Microsoft Word - SEND Policy 2026-2027.docx

11. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused, or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

12. Young carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

The DSL, DDSL and DSLO and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL, DDSL and DSLO will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare, and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL, DDSL and DSLO has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher Dawn King who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL, DDSL and DSLO to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

15. Pupils who are lesbian, gay, or bisexual

The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying.

Any concerns should be reported to Safeguarding Triage

16. Pupils who are questioning their gender

16.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers, or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.
When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

16.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL, DDSL and DSLO will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.3 Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

- The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

16.4 Rules on single-sex spaces

Pupils are not allowed into toilets, changing rooms, showers or designated for the opposite biological sex, with no exceptions.

16.5 Rules on single-sex sports

The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff

17.2 Other complaints

Any complaint regarding procedure and practice or the actions or decisions of individuals within Compass School should be addressed initially to the Deputy Headteacher. If further action is required, then the Headteacher and finally the Management Committee will also be informed.

17.3 Whistleblowing

Compass School has adopted the Southampton City Council Whistleblowing (Duty to Act) Policy
Whistleblowing (Duty to Act) Policy

18. Training

18.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation, or neglect.

This training will be regularly updated and will:

- Be integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles, and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins, and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

18.2 The DSL, DDSL and DSLO

The safeguarding triage team will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

18.3 Management Committee

All Management Committee members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of Management Committee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

18.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

18.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

19. Monitoring arrangements

This policy will be reviewed annually, reviewed annually and following significant legislative or safeguarding guidance changes

21. Links with other policies

This policy links to the following policies and procedures:

- Establishing Positive Behaviour for Learning (PBfL)
- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- AI
- Relationships and sex education
- First aid
- Curriculum
- Privacy notices
- Remote learning position statement
- Cyber Security
- Whistleblowing
- SEN
- Safer recruitment

Appendix 1: types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

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

- Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: Low Level concerns

Compass School is committed to creating and maintaining a culture of openness, trust, accountability, and transparency in which all concerns about adults working in or on behalf of the school are shared responsibly, recorded appropriately, and dealt with promptly.

Our school recognises its statutory and moral duty to safeguard and promote the welfare of pupils and understands that staff play a vital role in meeting these responsibilities.

This policy recognises the heightened vulnerability of pupils within our setting and the importance of maintaining clear professional boundaries at all times

Statement of Intent:
This policy forms part of Compass School's safeguarding framework and should be read alongside:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Behaviour Policy
- Whistleblowing Policy
- Online Safety Policy
- Keeping Children Safe in Education (KCSIE)

This policy applies to:

- All teaching and support staff
- Agency and supply staff
- Volunteers
- Management Committee members
- Contractors
- Pupils on placement
- Visitors working regularly within the setting

Purpose of the Policy
The purpose of this policy is to:

- Ensure all staff understand what a low-level concern is
- Promote a culture in which all concerns about adults are shared responsibly with the right person, without fear of victimisation, and they are recorded and dealt with appropriately
- Encourage early identification of concerning, problematic, or inappropriate behaviour
- Protect pupils from harm and to minimise the risk of abuse occurring.
- Protect staff from misunderstandings or false allegations
- Ensure concerns are responded to consistently, proportionately, and fairly
- Identify patterns of behaviour that may require escalation
- Support safer working practices
- To ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the school.
- To help create an environment where staff are comfortable to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Definition of a Low Level Concern
Keeping Children Safe in Education' defines a low level concern as:

"any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and/or
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer LADO"

Avoiding low level concerning behaviour

Behaviour defined as a 'low level concern' can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

Our school ensures that staff are clear about what appropriate behaviour is through their induction and regular reinforcement of documents such as:

- Staff Code of Conduct
- Safeguarding and Child Protection policies and regular training
- Teachers' Standards (for teaching staff)

Examples of Low-Level Concerns

Examples may include, but are not limited to:

- Being over-familiar with pupils
- Having favourites
- Inappropriate joking or language
- Using personal devices contrary to policy
- Contacting pupils through unauthorised social media or messaging platforms
- One-to-one situations behind closed doors without justification
- Inappropriate physical contact
- Failing to maintain professional boundaries
- Sharing personal information with pupils
- Giving gifts without authorisation
- Transporting pupils without approval
- Inappropriate use of restraint language or tone
- Humiliating or belittling pupils
- Swearing at pupils
- Failing to follow safeguarding procedures
- Breaching confidentiality
- Inappropriate behaviour off-site or online
- Engaging in confrontational or intimidating behaviour
- Poor judgement during incidents involving dysregulated pupils

Staff must understand that our pupils may have experienced trauma, adverse childhood experiences (ACEs), exploitation, abuse, or attachment difficulties. Professional boundaries must therefore remain exceptionally clear and consistent.

A concern may be raised through:

- Observation
- Disclosure by a pupil
- Complaint by a parent/carer
- Concern raised by another staff member
- Self-reporting
- Online activity
- Social media behaviour
- Behaviour outside work

Reporting a Low Level Concern

- Low level concerns about a member of staff should be reported to the Headteacher. If the concern is about the Headteacher this should be reported to the Chair of the Management Committee. If the

concern is about the Business Manager this will need to be reported to the Headteacher directly by telephone or email.
- Low level concerns about supply staff, contractors and local authority visiting staff should also be reported to the Headteacher who will then follow up with their employers.
- Where staff are unsure whether a concern meets the threshold, they must still report it.
- Failure to report concerns may itself be treated as a disciplinary matter

Dealing with a low level concern

- Where a concern is raised about the practice or behaviour of a member of staff, this information must be passed to the Headteacher.
- The Headteacher must then make an assessment to determine if the matter is a 'low level concern' or an 'allegation' and follow one of the following routes.
- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low level concerns that the school feel they can deal with internally will be dealt with via the school's usual processes.
- The school will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

Self-Reporting

Staff are encouraged to self-report where:
- They believe their conduct may have been misunderstood
- They may have breached professional boundaries
- A situation may give rise to concern or allegation
- They have made an error of judgement
- Self-reporting demonstrates professionalism and safeguarding awareness and will be considered positively.

Responding to a Low-Level Concern

The Headteacher will:
- Review the information received
- Clarify details where necessary
- Consider context and proportionality
- Speak with relevant individuals where appropriate

The Headteacher will determine whether:
- The concern is a low-level concern
- The concern should be escalated
- The concern meets the harm threshold
- Seek advice from the LADO where uncertainty exists
- Record actions and outcomes

Recording a low level concern

All low level concerns should be formally recorded by a member of staff when they are made aware of them. The record is completed using a Microsoft form https://forms.cloud.microsoft/e/J3ksh4e3wD which is accessed by the Head teacher

The record should include:

Details of the concern,
- The context in which the concern arose,
- The outcome of the investigation and any action taken, and

- The name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible).

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff on CPOMS StaffSafe. All records must be kept in line with data protection principles, and should be retained on the employee's personnel file in accordance with the school retention schedule. Please refer to the Headteacher to obtain a copy of your School's retention schedule if required.

Reviewing a low level concern

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Business Manager in discussion with the Headteacher will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

The school will take advice, where appropriate, from their HR provider in respect of low level concerns.
The school will also review appropriate policies and training, or other wider cultural issues in the school, to see whether anything needs to be done to minimise the risk of similar behaviour happening again.

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles and should be retained on the employee's personnel file in accordance with the school retention schedule. Please refer to the Headteacher to obtain a copy of your School's retention schedule if required.

Low level concerns will not be included in a reference unless they relate to issues which would normally be included in a reference (e.g. misconduct or poor performance). Low level concerns which relate solely to safeguarding will not be included in a reference, unless referred to the LADO.

A low level concern (or group or pattern of concerns) which has met the harm threshold and has therefore been referred to the LADO may be included in a reference depending on the circumstances.

Appendix 3: specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education (KCSIE) 2026), in particular part 1 – you'll need to adapt it to reflect your context and any locally agreed procedures.
Part 1 also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery, and cybercrime. If you wish to cover these in the policy, consider including:
An explanation of what the issue is and how your school approaches it (e.g., any preventative measures in place, training you provide for staff)
What staff should be aware of and actions they should take
How your school works with external agencies, where relevant

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on part 1 of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the Safeguarding triage. The DSL, DDSL or DSLO will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with Safeguarding Triage. The DSL, DDSL or DSLO will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens, and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- 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
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSL, DDSL or DSLO will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL, DDSL and DSLO will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL, DDSL and DSLO will also make a referral to local authority children's social care. Where children are living independently from their parent/carers (e.g., if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL, DDSL and DSLO will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting, or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems

- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this the Safeguarding Triage team

The DSL, DDSL or DSLO will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fcdo.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence
- Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- Terrorism is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, DDSL and DSLO, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with Safeguarding Triage

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures

Harmful sexual behaviour, sexual violence, and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment, and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras, and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with, or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation
- Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male

- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to Safeguarding Triage

The DSL, DDSL and DSLO will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns, and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Appendix 4: Safeguarding Information for Visitors, Volunteers and Supply Staff

Welcome to Compass School

At Compass School we are committed to safeguarding and promoting the welfare of every child and young person. We hope this guide provides useful information to help you understand your responsibilities while visiting our school.

Everyone who works in or visits Compass School has a responsibility to help keep our pupils safe.

Please read this information carefully before your visit and keep it available for reference.

If you are worried about the safety or wellbeing of a child or young person, **you must report your concern immediately.**

Our Commitment to Safeguarding

Our safeguarding policy applies to all staff, governors, volunteers, contractors, and visitors.

Our safeguarding procedures are designed to:

- Ensure safe recruitment practices for staff and volunteers.
- Raise awareness of safeguarding and help pupils develop the knowledge and skills to keep themselves safe.
- Identify, respond to and report concerns or suspected abuse or neglect.
- Support pupils in accordance with safeguarding procedures.
- Provide a safe, secure, and supportive environment where pupils can learn and thrive.

Our safeguarding policies are available on our website: **www.compass-school.co.uk**

Safeguarding Team

Please familiarise yourself with our safeguarding team.

Designated Safeguarding Lead (DSL)

Debbie McKenzie
Headteacher
Debbie.McKenzie@compass-school.net

Deputy Designated Safeguarding Lead (DDSL)

Sally Howells
Assistant Headteacher
sally.howells@compass-school.net

Designated Safeguarding Lead Officers (DSLOs)

- Luisa Whittick
- Lacey Weeks
- Lisa Lewry
- Gemma Allan
- Chris Alston
- Dawn King

Reception can contact a member of the safeguarding team at any time during your visit.

Reporting a Safeguarding Concern

If you have a safeguarding concern during your visit:

- Report it immediately to a DSL, DDSL or DSLO.
- Reception staff can contact a member of the safeguarding team if required.
- You may be asked to provide a brief factual written account of your concern.

Compass School follows Local Authority safeguarding procedures and works in partnership with Children's Services and other agencies where appropriate

If a Child Makes a Disclosure

If a pupil chooses to speak to you:

- Stay calm and listen carefully.
- Take what they say seriously.
- Do not promise confidentiality or agree to keep secrets.
- Explain that you must share the information with staff who can help keep them safe.
- Do not ask leading questions or investigate further.
- Reassure the pupil they have done the right thing by telling you.
- Report the concern immediately.

Do not wait until the end of your visit. All safeguarding concerns must be reported before leaving the school site

Professional Conduct

Visitors are expected to:

- Maintain appropriate professional boundaries with pupils at all times.
- Wear their visitor badge so it is clearly visible throughout their visit.
- Follow all instructions given by school staff.
- Avoid being alone with a pupil unless authorised by a member of staff.
- Respect pupils' dignity, privacy, and wellbeing.
- Never exchange personal contact details or connect with pupils through social media.
- Report any safeguarding concerns or low-level concerns immediately.
- Challenge or report anyone on site who is not wearing appropriate identification.

These expectations reflect the principles of **Keeping Children Safe in Education (KCSIE)** and help maintain a safe environment for everyone

Photography, Mobile Phones and Wearable Technology

To safeguard pupils and staff:

- Photography is not permitted unless prior permission has been granted.
- Video recording and audio recording are prohibited unless authorised.
- Mobile phones should only be used in designated areas and never to photograph or record pupils.
- Smart glasses, body-worn cameras, smart watches with recording capability and any other wearable recording devices must not be used on the school site unless specifically authorised by the Headteacher or Senior Leadership Team.

Any unauthorised recording may result in visitors being asked to leave the site

Allergy Awareness (Benedict's Law)

Compass School is committed to maintaining an allergy-aware environment in line with current best practice and the principles of Benedict's Law.

Lockdown Procedure

On very rare occasions it may be necessary to implement a lockdown to protect pupils, staff, and visitors.

Examples include:

- Security incidents
- Serious weather

- Chemical incidents nearby
- Unauthorised persons attempting to access the site

If a lockdown is initiated:

- Remain calm.
- Follow staff instructions immediately.
- Stay with the supervising member of staff until informed it is safe to move.

Fire Evacuation

If the fire alarm sounds:

- Leave the building immediately using the nearest safe exit.
- Proceed to the designated assembly point.
- Report to a member of staff so your presence can be accounted for.
- Any pupils accompanying you should immediately join Compass School staff.

Visitor Requirements

All visitors must:

- Sign in and out using InVentry
- Wear their visitor badge at all times.
- Follow safeguarding and health and safety procedures.
- Remain accompanied where required.

Visitors who do not hold the appropriate enhanced DBS clearance must remain accompanied by a member of staff throughout their visit.

Regular visitors may be permitted unaccompanied access once appropriate safeguarding checks have been completed

Contractors

Preferred contractors:

- Sign in and out using InVentry
- Confirm DBS status where appropriate.

Contractors working during the school day will normally be supervised unless safeguarding checks and risk assessments determine otherwise.

Unknown or irregular contractors must:

- Provide photographic identification.
- Provide DBS evidence where appropriate.
- Remain supervised throughout their visit.

The Site Manager will authorise any unfamiliar contractor before work commences.

Equality, Inclusion and Respect

Compass School is committed to equality, diversity, and inclusion.

We expect all visitors to:

- Treat everyone with dignity and respect.
- Respect protected characteristics.
- Model positive behaviour and language.
- Avoid behaviour that may be discriminatory, intimidating, offensive or harassing.
- Report any concerns they witness.

Safeguarding is everyone's responsibility. Thank you for helping us keep our pupils safe