

Safeguarding and Child Protection Policy 2026-2027

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Policy Aims & School Vision

The Inspired Philosophy

As part of the Inspired Group, we are also guided by the philosophy of the Inspired Group:

- *A child's education is the single most important consideration for any parent or carer.*
- *At Inspired, we believe that it is an individual's total educational experience that instils the knowledge, attitudes, beliefs, and values that they will carry with them for life.*
- *We believe that this set of knowledge, attitudes, beliefs, and values, instilled by education, will form the basis of how we approach the future.*

Inspired schools believe that these are the foundations on which we build and plan our lives. At King's InterHigh (KIH) and Academy21 (A21), we welcome students with varied plans, including attending university, or college, obtaining an apprenticeship, or going into the workplace. Being part of Inspired allows us to cater for our rich and varied student community through an inclusive and positive approach that maintains high expectations of all our students with their aspirations.

Our vision and aims

Both KIH and A21 welcome students with a variety of prior education experiences and with varied aims. This is fundamental to what we do - our vision is to be a flexible home for all students and so we seek to offer a curriculum and experience that allows students to pursue learning interests, fits around other priorities and gives them the structure needed to work towards their goals. We seek to create the conditions for this – a purposeful learning environment, the ability to focus and challenge oneself and a sense of safety and value for every child.

We have core aims that underpin this vision. They are to:

1. provide a **high-quality, positive, and inclusive learning experience and environment** that inspires all students to discover, develop and fulfil their potential and make outstanding progress in their learning whatever their starting point.
2. promote **desirable behaviour, a culture of mutual respect, and maximum engagement** in learning through our actions and wider culture.
3. **recognise the successes and development of each student**, be it social, emotional, academic, or otherwise, that develops self-esteem, and respect for self and others.

There are some broader themes to our vision that are worth detailing:

Participation: We believe educational success comes from students actively participating in learning through attending live classes or using lesson recordings and resources actively; submitting set work; engaging with their peers or just following feedback to improve. As a school we set conditions for our staff and students to be reflective on their efforts and act with integrity, building a culture of improvement and contribution to the community that ultimately makes everyone's impact on the world a positive one.

Holistic development: In a rapidly evolving digital world, we take seriously the holistic development of our students and aim to equip students with the tools and attitudes to navigate technology and global relationships positively. We have robust actions in place to keep the school free from more negative instances that might occur in other settings such as bullying or disruption.

Inclusivity and flexibility: We are inclusive, and we want every child, regardless of additional needs, to be the best version of themselves through the support of our flexible schooling and adaptive teaching.

Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related national guidance (UK). This includes the **Keeping Children Safe in Education 2026**, [KCSIE 2026](#) with specific consideration of Human Rights and Equality legislation as per the school's values. In line with [Working Together to Safeguard Children 2026](#), we define safeguarding as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Making sure 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

KIH and A21 take their responsibilities seriously, under section 175 of the Education Act 2002, normally followed by schools, to safeguard and promote the welfare of our students; and to work together with other agencies, where necessary, to ensure adequate arrangements within our school to identify, assess, and support those who are suffering harm. Our school adopts an 'it could happen here' attitude and we foster a culture of safeguarding across the school.

We recognise that all adults, including temporary staff and volunteers, have a full and active part to play in protecting our students from harm, and that the child's welfare is our paramount concern. We maintain a child-centred approach to safeguarding. We recognise that every child is unique and that safeguarding decisions should take account of the child's wishes, feelings, lived experiences, communication needs, age, understanding and individual circumstances. Wherever appropriate, children will be supported to participate in decisions affecting them. Wherever possible, we take a proactive approach to prevention and will act with urgency when responding to concerns.

All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of each individual student. This policy should be understood alongside school policies on related safeguarding issues.

Key Contacts – these are the main staff members who have oversight of safeguarding in the organisation

Catriona Olsen Executive Headteacher (KIH)	catriona.olsen@kingsinterhigh.co.uk
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The staff named above are also responsible for online safety at the school in conjunction with the school's IT Teams and Education Leadership Team.

***Please also see the 'Contact Trees' for each organisation of the order in which staff should be contacted, where necessary. Terminology**

- **Victim:** although not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way, we use this term in-policy to describe a child who may have been harmed

- **Perpetrator:** this terminology is used because it is widely understood; as above, we understand the need for careful use of language when speaking to parties involved in an allegation or investigation
- **Child on child abuse:** we recognise that a child is any young person from birth to the age of 18; the change from the former term, “peer-on-peer abuse”, acknowledges that it is not just children in the same peer group or age bracket that can be affected by this manner of harm

Purpose and Ethos

KIH and A21 are two independent communities under the Inspired Online Schools umbrella, and all staff in these communities have an essential role to play in making them safe and secure. Wherever the word “staff” is used, it covers all staff with access to our student-facing platforms, including support and self-employed staff/contractors, volunteers working with children and board members.

The schools recognise the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. Participation in our school may be the only stable and predictable element in their lives.

We will endeavour to support the welfare and safety of all students through:

- Maintaining students’ welfare as our paramount concern - to support students’ development in ways that will foster security, confidence and independence
- Ensuring the content of the curriculum includes social and emotional aspects of learning
- Ensuring that child protection is included in the curriculum to help students stay safe, recognise when they do not feel safe and identify who they might/can talk to
- Providing suitable support and guidance so that students have a range of appropriate adults to approach if they are in difficulty
- Promoting a positive, supportive, neutral and secure environment where students can develop a sense of being valued and heard as people in their own right
- Working with parents, carers or mentors to build an understanding of the school’s responsibility to ensure the welfare of all students, including the need for referral to other agencies in some situations
- Ensuring all staff can recognise the signs and symptoms of abuse, neglect and exploitation and are aware of the school’s procedures and lines of communication
- Monitoring students who have been identified as having welfare or protection concerns; keeping confidential records which are stored securely and shared appropriately with other professionals
- Effective and supportive liaison with mentors and/or other agencies, especially the police and Social Care, where required
- Ensuring all staff adhere to [‘Teaching online safety in school’](#) (Updated January 2023). This guidance from England’s Department for Education (DfE) outlines how schools can ensure their students understand how to stay safe and behave online as part of existing curriculum requirements. Our policies and practice for teaching students about online safety are in line with this guidance
- Ensuring young people over the age of 18 provide a clean DBS check before entering lessons
- Ensuring that our learning management platform is password protected and our virtual classrooms are set up with waiting rooms to ensure only verified students may enter. Students may be removed from a classroom for poor behaviour and are unable to re-join without the permission of their teacher
- All live lessons being recorded. Our recordings are normally available to students to review for two academic years while they remain enrolled in the school, facilitating revision of material. Our lesson recordings allow us to conduct quality assurance checks on the course delivery and serve as evidence, should any concerns about behaviour or safeguarding during lessons be raised. Recordings are only available to stakeholders who have their own login credentials.

- Encouragement of use of student webcams in lessons and meetings (All year groups at KIH, in Primary only at Academy 21), to help create a positive rapport and to ensure teachers can see their students regularly. If a teacher becomes concerned about anything they see, they have means of communicating individually with a student even in a group lesson using direct chat or a Q&A function and can follow up with an individual meeting with that student (at KIH). Concerns about A21 students are always followed up with mentors.
- Effective communication regarding any bullying or safeguarding incident, which occurs during a class. If this occurs, the recording will be passed to the Designated Safeguarding Lead. The recording may not be made available to students for academic purposes. Segments will be removed, if possible, prior to any posting of the recording. The original recording and/or transcript will be kept as part of the dossier of evidence on the incident.
- All our classrooms and meeting rooms are set up with the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead able to attend as 'live assistants'. This means that they can enter the room at any point to observe a segment of the lesson or support session. Senior leaders regularly visit live lessons to assure quality of provision.

A Safe School and Safe Staff

We take a robust approach to online safety, both to protect and educate our students in responsible use of technology, and to establish mechanisms which can identify, intervene and escalate any safeguarding incident. We ensure our staff and students are educated about five areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
- **contact:** being subjected to harmful online interaction with other users; or generative AI applications that stimulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying
- **design:** where the system itself may cause harm
- **commerce:** risks such as online gambling, inappropriate advertising, financial extortion, phishing and or financial scams i.e. sextortion

As a school, we ensure that all members of staff understand and fulfil their responsibilities to ensure that safeguarding and child protection remains a paramount priority. We will follow the following points to ensure this occurs:

- The school operates safer recruitment procedures by ensuring that there is at least one person on recruitment panels that has completed Safer Recruitment training
- The school has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have, had they not resigned. These are outlined in the Managing Allegations Against Staff Members policy
- Each school has a senior leader who is Designated Safeguarding Lead (DSL) with overall responsibility for all aspects of safeguarding and child protection. A DSL or appropriately trained deputy DSL will always be available during school operating hours and during activities involving children
- Each school has appropriate DSL cover arrangements in the provision of a confidential shared mailbox or communication channel
- All other staff have safeguarding training updated as appropriate
- Any weaknesses in child protection are identified and remedied immediately

- A member of the Senior Leadership team will be nominated to liaise with the relevant agencies on child protection issues and in the event of an allegation of abuse made against anyone in the senior management team
- Safeguarding policies and procedures are reviewed annually, and the safeguarding policy is available on the school website
- The Senior Leadership Team considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through PSHE classes and extra-curricular enrichment i.e. form time, assemblies and house meetings (at KIH)
- That enhanced DBS checks (or equivalent) are in place for all school staff members and volunteers
- The Executive Headteachers, Heads of Key Stage, Heads of A21 (all also DSLs), and any other staff involved in recruitment will complete safer recruitment training, to be renewed every 2 years
- All members of staff are provided with safeguarding awareness information during the onboarding process, including the safeguarding policy, all policies linked to safeguarding and the key people to contact
- All members of staff receive regular updates and training in e-safety and reporting concerns
- All staff are provided with child protection awareness information to maintain their understanding of the signs and indicators of abuse and are required to read Part 1 of Keeping Children Safe in Education 2026
- All members of the Inspired Education Group, including staff, agency staff and volunteers know how to respond to a student who discloses abuse, neglect and/or exploitation
- Staff must be aware that children may not be ready, or know how, to disclose abuse, neglect and exploitation - particularly if the child has SEND. Children with disabilities are 3 times more likely to be abused than their peers.
- All parents, carers and mentors are made aware of the responsibilities of staff members with regard to child protection procedures
- We will ensure that child protection concerns or allegations against adults working in the school are referred to the appropriate authorities, and any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS), or equivalent, for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, as per our Managing Allegations Against Staff policy
- Our procedures will be regularly reviewed and updated
- The name of the DSL will be clearly advertised for each school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse, neglect and exploitation.
- All new members of staff will be given a copy of our safeguarding policy and have access to its associated policies, with the DSLs' names clearly displayed, as part of the onboarding process
- The policy is available on the school website. Parents, carers and mentors are made aware of this policy and their entitlement to have a copy of it via the school website

Responsibilities

The DSLs at KIH and A21 have an overall responsibility for the day-to-day oversight of safeguarding and child protection

At KIH, these responsibilities include:

Referring a child or young person if there are concerns about possible abuse, to their local safeguarding team, and acting as a focal point for staff to discuss concerns. Referrals should be made in line with the local authority's procedures.

At Academy 21, these responsibilities include:

Ensuring that the assigned mentors from the commissioning setting are informed immediately about safeguarding concerns. Each A21 student must have an assigned child protection mentor at the setting where they are on roll. In most cases, this will be the DSL at the commissioning school or Local Authority. This is the person who is responsible for any appropriate referrals locally, as the student is on roll with that setting. As explained below, A21 DSL will make referrals as required. The A21 DSL will seek confirmation about what action has been taken by a school in relation to concerns raised, and a log of all concerns, actions and communications will be held securely on the individual student's My Concern log.

For students accessing A21, the commissioning school or Local Authority is ultimately responsible for the safeguarding of their student(s), including any provision they put in place. The commissioner must ensure effective supervision and monitoring is in place for the student(s) whilst they are accessing A21 content. Academy 21 provides multiple tools to support our commissioning settings to do this effectively, via the mentor portal. It is an expectation of commissioning settings to use this platform to monitor their students. Where there is an urgent safeguarding concern, the A21 DSL will make direct contact with the commissioner and seek to speak with the child protection mentor in the first instance. If this is not possible, the A21 DSL will contact all listed mentors. In the unlikely event the A21 DSL is unable to make contact due to mentors being unavailable, the DSL at A21 will assume responsibility for escalating the concern to the appropriate agencies, which may include emergency services, police, local children's services teams and parents/carers. Academy 21 will contact parents/carers as appropriate, to ensure student safety. The A21 DSL will then ensure full communication of actions taken is shared with the commissioner as soon as possible. The A21 DSL will require the commissioner to confirm by email that they have received the information and note any further actions they are taking. In such circumstances, the commissioning setting retains overall responsibility for ensuring the safety and welfare of their student(s), including any information-sharing with parents/carers.

Further responsibilities for both A21 and KIH DSLs:

Keeping electronic records of concerns about a child even if there is no need to make an immediate referral.

Ensuring that all such records are kept confidentially and securely and are separate from student records, until the young person's 25th birthday, and are shared with the young person's next school or college, where required.

Liaising with other agencies and professionals, where appropriate.

Ensuring that either they or the staff member attend case conferences or other multi-agency planning meetings and contribute to assessments (KIH) This is the commissioning setting's responsibility for students studying at A21, though where appropriate and requested, the A21 DSL will provide relevant information not already shared on the mentor portal in advance of such meetings.

Organising child protection information sessions, and updating full training every year, for all school staff. Refresher training will be completed each year during directed days

The welfare and safety of children are the responsibility of all staff in the school and **ANY** concern for a student's welfare **MUST** be reported to the DSL.

To protect confidentiality, safeguarding information about individual children is shared on a need-to-know basis only and thus, what may seem to be a minor issue to one staff member, may be highly significant to the bigger picture of risk.

Equality of Safeguarding Provision

Some students may be at an increased risk of abuse or face additional barriers which make them less likely to disclose abuse. KIH and A21 are committed to ensuring that all students receive equal protection, regardless of their circumstances or the barriers they face. We therefore give special consideration to a student who:

- is disabled or has specific additional needs
- has special educational needs
- is a young carer at home
- shows signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups

- frequently misses school or goes missing from care or from home
- is misusing drugs or alcohol
- is in a family circumstance presenting challenges, such as substance abuse, adult mental health problems or domestic abuse
- is showing early signs of abuse, neglect and/or exploitation
- is at risk of modern slavery, trafficking, FGM, sexual exploitation, forced marriage, or being radicalised.
- is or has previously been fostered or looked after
- is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality, for example children who identify as LGBTQ+, or a child who does not have English as a first language
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody, or is affected by parental offending; and/or
- is frequently missing/goes missing from education, home or care
- Is looked after or living in a residential setting

Safeguarding & Child Protection Procedures

KIH and A21 adhere to the KCSIE (2026) safeguarding procedures as far as possible for an online setting. The full KCSIE procedures document and additional guidance relating to specific safeguarding issues can be found on the Department for Education website ([DfE link](#)).

It is the responsibility of the DSL and Senior Leadership Team to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary with parents, carers and and/or mentors in most cases. On-going assessment of cases is reviewed weekly in a formal supervision meeting held between the DSLs and Executive Headteachers.

Responding to emergency situations:

In the event of a serious and urgent concern, staff members alert the DSL team immediately, and will take all actions deemed necessary to prioritise the welfare of the child or young person. This may include the need to make referrals to external agencies and services. To help with this decision they may choose to consult with a local authority safeguarding adviser. Advice may also be sought from the emergency services and/or local authority social workers where required. All actions taken and all communications between agencies are logged securely on My Concern, and cases are discussed in formal supervision meetings to ensure the DSL team have taken all necessary measures to prioritise the safety and welfare of the child or young person.

Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents, carers and mentors are made aware of these. Some concerns may need to be monitored over a period of time before a decision is made to refer to local authority social services and other external agencies.

In all but the most exceptional circumstances, parents, carers and mentors will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral to social services being necessary, parents, carers and mentors will be informed and consent to this will be sought, unless there is a valid reason not to do so. The role of the school in situations where there are child protection concerns is NOT to investigate, but to recognise and refer.

On occasion, staff may pass information about a child to the DSLs but remain anxious about action subsequently taken. Staff should feel able to clarify with the DSLs further progress, so that they can reassure themselves the child is safe, and their welfare is being considered. If following this process, the staff member remains concerned that appropriate action is not being taken, it is the responsibility of that staff member to seek further direct consultation from a different member of the Senior Leadership Team who will be able to discuss the concern and advise on appropriate action to be taken.

Parents, carers and mentors can obtain a copy of the school Safeguarding Policy and other related policies via the school website.

Recognition and Categories of Abuse

All staff in school should be aware of the definitions and signs and symptoms of abuse, neglect and exploitation. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

The most up to date definitions are found in Appendix 1 of this document. Staff need to remember that child abuse, neglect and exploitation can occur within all social groups regardless of religion, culture, social class or financial position. Children who have a disability are statistically subject to greater risk of abuse and are particularly vulnerable. It is also important to remember that those who abuse children can be of any age, gender, ethnic group or background and it is important not to allow personal preconceptions to prevent recognition or action taking place.

When identifying abuse, staff should be mindful of the need to consider the context of the culture, law and guidance of the relevant jurisdiction of the student. It is important to consider whether the student, their family and their society view the behaviour as unacceptable, as this will be a determining factor in whether the student experiences the behaviour as abusive. Where staff are unfamiliar with the expectations of behaviour in a particular jurisdiction, they are encouraged to report the behaviour in line with expectations of behaviour in the UK. KIH and A21 openly advocate for the rights of children in line with the UN Convention for the Rights of the Child.

Induction and Training

All school-based staff will be offered an appropriate level of safeguarding training. This will include internal school responsibilities, child protection processes, how to recognise and respond to signs and symptoms of concern and abuse, and safe working practices. All staff are required to read Part 1 of Keeping Children Safe in Education 2026. Training is organised by the DSLs in line with government guidance that currently requires this to be updated annually, to continue to provide staff with the relevant skills and knowledge to safeguard children effectively. Our teachers and leaders participate in a series of safeguarding training modules and events to ensure they are equipped with the necessary knowledge and skills to recognise safeguarding concerns.

The DSLs will ensure that all new staff are appropriately inducted as regards the school's internal safeguarding procedures and communication lines. This policy and all associated school policies will be provided to new members of the school team.

Record Keeping – MyConcern

Staff must record any wellbeing or welfare concern that they have about a child on the dedicated safeguarding platform, MyConcern. This should be completed without delay, and any information submitted will be sent to and accessed by the DSLs. Records must be completed as soon as possible after the incident/event. The date, time, details and staff member submitting the concern must be detailed when submitting the concern.

Why is recording important?

Staff have a duty to promote the wellbeing and safety of every child who attends our school. This is a whole-school task. Since staff have differing roles in our school, we observe students in a range of classes and activities throughout the school day. Students may show or tell us that something is wrong in a variety of ways. We all have an important role to play in helping to identify welfare concerns for students, and possible indicators of abuse or neglect at an early stage. For some students a 'one-off' serious incident or concern will come to your attention, and you will have no doubt that you must immediately record and report this. Most often, however, it is the accumulation of a number of small incidents, events or observations – the 'jigsaw' – that provide the evidence that a child is being harmed or in danger. It is vital, therefore, that any concern a member of our community has for a student's welfare, however small, is recorded and passed to DSLs, via MyConcern.

What is a welfare concern?

As a general rule, anything that you consider unusual or out of the ordinary for the student constitutes a concern. Mostly, these will arise in one or more of the following areas:

- the student's behaviour changes, or a particular behaviour is observed
- the student has a physical injury
- the student tells you something has happened to them (a disclosure)
- the student's physical presentation
- you receive information from or about a parent or carer

Why must staff members pass on their concerns in writing?

It is important that any person who has the concern gives a first-hand account of this so that there is a clear and accurate record of what has been seen, heard etc. A record written by the member of staff will ensure that there is no misinterpretation of the concern, or that it can be overlooked or forgotten. By keeping a standardised system of reporting concerns, the DSLs can handle these at the earliest opportunity.

How and what do staff members record?

Through the Teacher Hub or school managed bookmarks, staff members have the ability to submit concerns to our dedicated safeguarding platform, MyConcern. Staff will be asked to add the name of the student, the date, the time and the nature of the concern, providing as much detail as possible. The level of detail is highly important, particularly where a child discloses information to a member of staff. Where a child discloses information, a referral should be submitted as soon as possible so the details are clear in the reporting staff member's mind.

What happens to the record once it has been submitted?

One of the main purposes of recording is to make sure that the DSLs can respond properly to safeguarding concerns about students. They will take what action is necessary in response to concerns raised. Actions they will take will of course depend on how serious and urgent the concern is. These can range from a decision to monitor the student while attending lessons, to referring the issue to social services, so that they can undertake an assessment of the child's safety. The completed concern will be via MyConcern in a confidential and secure way, so that limited members of the school staff have access to this information. Staff should submit the concerns, via MyConcern, at the earliest opportunity.

Who will see the concerns raised? Will parents, carers and mentors see a student's record?

Information regarding a student's welfare will be shared on a strict 'need to know' basis.

Neither parent nor student has an automatic right of access to child protection records, and in most cases the actual record will not be shared with parents, carers and mentors. However, all staff should ensure that they write in a way that, if they were asked to release school records (perhaps by a court), the record is a fair and factual account of an incident or event. One of the most common responses by the DSLs, to concerns raised by staff for students, will be to share these with parents, carers and mentors, with the purpose of working with them to understand and address the issue of concern. The details of staff referrals therefore may be presented verbally to parents, carers and mentors. Sometimes the concern will be one of many. If the DSLs are worried that talking to parents, carers and mentors might create a risk to any staff member's safety they will not do this but will seek advice.

All safeguarding records will be forwarded to a child's subsequent school, where known, confidentially to the new DSL or Head of Key Stage. This will typically be done either by secure transfer between safeguarding record systems or by via encrypted email, in a password protected document (with passwords shared separately).

Low-Level Concerns

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the local authority

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

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

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

It is crucial that all low-level concerns about a member of staff are shared responsibly via MyConcern (so they are visible to the DSL and safeguarding team) and dealt with appropriately.

Ensuring concerns are dealt with effectively should also safeguard those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings relating to staff. Concerns about staff should be responded to in accordance with the Managing Allegations Against Staff Members policy (see section below).

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

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

School Counselling Service - Confidentiality Policy (KIH ONLY)

In order to provide a counselling service where our students feel safe to express themselves, it is necessary to offer a high level of confidentiality. This policy is designed to clarify the nature of that confidentiality and make clear the circumstances in which information brought to counselling may need to be shared with other parties.

Reference should be made to the Service Agreement signed prior to commencing counselling sessions at KIH.

Aims

- To set out the rights of our students to attend confidential counselling
- To make clear what the limits of confidentiality are
- To refer to legislation and case law (but may be different in devolved areas) that informs the policy
- To set out how information will be passed on under safeguarding procedures

Relevant Legislation

This policy is drawn up with regard to the following:

- Human Rights Act 1998 (Article 8) which affords young people the right to privacy
- The UN Convention on the Rights of the Child 1989
- The Children Act 1989
- The Education Act 2002

Child or Young Person's Right to Confidentiality

At KIH, the counselling service offered is paid and requires subscription to the service, almost always at the request of the parent/carer/mentor. However, under the 'Gillick Principle', parental consent for counselling is not required for a young person under the age of 16 who is considered Gillick competent. (The Gillick principle was established in 1985 when Lord Scarman ruled that ...parental right yields to the child's right to make his own decisions when he reaches a sufficient understanding and intelligence to be capable of making up his own mind on the matter requiring decision.) In addition, "promoting and maintaining the young person's entitlement to confidentiality could be seen to be consistent with the statutory duty 'to safeguard and promote the welfare of the child' under s.175 Education Act 2002." The policy document 'Every Child Matters' emphasises, 'the needs, interests and welfare of children' as well as the need to develop pastoral care for all children.

Limits to Confidentiality

To 'safeguard and promote the welfare of the child' also extends to protecting young people from harm. The school counsellor will follow procedures laid out in this policy, and associated school policies, and will refer a concern about a child to the DSLs - where there are strong grounds for thinking that a student might be at risk of significant harm to themselves, to others or at risk from others. The same will apply where they have concerns for the welfare of a third party.

It is recognised that at times this will be a difficult judgement which will require the counsellor to balance the promotion of the student's welfare and avoidance of harm against the student's autonomy and trust in the integrity of the counselling relationship.

Our school counsellor will seek guidance from the DSLs, whilst maintaining confidentiality, until a decision can be made about what is in the best interest of the student. This is particularly important in instances where the student does not consent to any breach in confidentiality. They will also pass on information, as required by law, in the event of a disclosure about acts of terrorism or serious crime or if required to do so by a court order.

Responsibilities of the Counsellor

The counsellor will keep all details of counselling sessions confidential. No other information will be shared without the consent of the young person, unless it is necessary under safeguarding procedures. They will explain to the students attending counselling that not all information shared can automatically be kept confidential, but that any information that it is necessary to pass on will be kept to an absolute minimum. Wherever possible they will gain the consent of the student before sharing any information. In the first instance the counsellor will discuss ethical issues around whether to break confidentiality in supervision.

Record Keeping and Recording

All notes from counselling sessions will be kept securely by the school counsellor in accordance with the General Data Protection Regulations (GDPR). If a student is signed up by a parent/carer/mentor of a student and the student refuses to attend or engage with the counselling session/s, the parent/carer/mentor will be informed by the DSLs. If a student aged 16 or above self-refers for counselling, the school has no obligation to inform the parents, carers and mentors if, the student falls under the 'Gillick Principle', because 'parental consent for counselling is not required for a young person under the age of 16 who is considered Gillick competent'. (Due to the nature of our school and the process of enrolments, it is likely that this will be a highly infrequent occurrence.)

Allegations Against Staff Members and Contractors

More detailed information can be found in the Managing Allegations Against Staff Members Policy.

KIH and A21 recognise that it is possible for staff and contractors to behave in a way that might cause harm to the students and takes seriously any allegation received. Such allegations should be referred immediately to the Executive Headteacher to decide the most appropriate course of action to be taken in respect of the student and staff member.

All school staff should take care not to place themselves in a vulnerable position with a child. All lessons and face-to-face interactions with students must be recorded and the recording will be stored via cloud storage on the video conferencing platform.

We understand that a student may make an allegation against a member of staff. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation, or aware of the information, will immediately inform the Executive Headteacher (or the CEO where an allegation is against the Executive Headteacher). If the allegation made to a member of staff concerns the Executive Headteacher, the person receiving the allegation will immediately inform the CEO who will consult as identified above, without notifying the Executive Headteacher first.

Suspension of the member of staff against whom an allegation has been made needs careful consideration, and the Executive Headteacher will seek the advice of the CEO, and any necessary external agencies or government bodies in making this decision, this includes informing the relevant LADO to seek advice and guidance.

In the event of an allegation against the Executive Headteacher, the decision to suspend will be made by the CEO with advice as above.

Children Absent and Missing in Education

Both KIH and A21 are committed to taking appropriate action in relation to a child who has unexplainable and/or persistent absences from education.

The KCSIE 2026 guidance from the UK Government has recently updated its definitions relating to this topic to discern between children who are absent from education and children who are missing from education.

Children absent from education is defined as those who are of a compulsory school age, are registered with a school setting, but do not attend for prolonged periods and/or repeat occasions. This relates to children who have unexplainable and/or persistent absences from education.

Children missing from education is defined as those who are of a compulsory school age but are either not registered at a school or else not receiving suitable education in place of a school setting.

At KIH, we take the following steps for children who would be considered to be missing from education:

- Follow our school's safeguarding policy in relation to recognising, responding to and supporting students who may be suffering harm
- Contact the child's parents or carers to establish the child's education status and investigate any concerns we have related to possible CME
- Discuss any concerns with the local authority or appropriate service, reporting these as appropriate in timely manner.

King's InterHigh recognises that a student whose access to learning has been restricted may, in some circumstances, be considered absent from education. Details of the school's safeguarding responsibilities and the expectations placed on parents during periods of account restriction are set out in Appendix 3.

At A21, we take the following steps for children who would be considered to be missing from education:

- Follow our school's safeguarding policy in relation to recognising, responding to and supporting students who may be suffering harm
- Ensuing client schools have up to date tracking information on a student's attendance in A21 lessons so lesson by lesson the physical school mentor can monitor attendance and fulfil their safeguarding duty.
- If we have concerns about a child at A21, we report these to the client school's designated mentor outlining our concerns and our actions up to that point. This may include where we have attendance related concerns about a student.
- If required, and the route via the student's registered school is not available, we would report concerns relating to a child directly to the relevant Local Authority.

Anti-Bullying Policy

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender-related bullying. We keep a record of known bullying incidents.

Racist Incidents

KIH and A21 acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

Prevention

We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. The school community will therefore:

- Work to establish and maintain an ethos where students feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with children e.g. through questionnaires, participation in anti-bullying week, asking children to report whether they have had positive/negative school experiences.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE, assemblies and house meetings (at KIH), opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. This will include anti-bullying work and e-safety. Also focused work in Year 6 (at KIH) to prepare for transition to the secondary school and learn how this differs from primary school.
- Ensure all KIH and A21 staff are aware of school guidance for the use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

Early Help

Any child may need early help, but there are children who more specific circumstances who are more likely to experience issues of safeguarding, and staff should be particularly vigilant to a potential need for early help. We work hard to ensure we have as much information about our students as possible to ensure we can monitor students who may be more vulnerable. Assessments and support provided through early help arrangements will, where possible include consideration of the child's wishes, feelings and lived experience.

- is disabled, has certain health conditions or specific additional needs;
- has special educational needs (whether they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of antisocial or criminal behaviour, including gang involvement
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance that presents challenges for the child, e.g. drug and alcohol misuse, adult mental health issues or domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse, such as Female Genital Mutilation (FGM) or Forced Marriage
- is privately fostered
- is persistently absent from education
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- is frequently missing/goes missing from education, home or care
- Is looked after or living in residential setting

Working with Other Agencies

KIH and A21 recognise and are committed to working with other professionals and agencies, where necessary, both to ensure students' needs are met and to protect them from harm. Where identified, we will work with students and families who may benefit from the intervention and support of external professionals.

Schools are not the investigating agency when there are child protection concerns, and the school will therefore pass all relevant cases to mentors (for A21 students) and the statutory agencies. We will contribute to the investigation and assessment processes, as required, and recognise a crucial part of this may be in supporting the student while these take place. If children do not require the support of statutory children's services, the DSL will support other agencies and professionals in carrying out inter agency assessments as appropriate.

KIH and A21 recognise the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Meetings around the Child/Family, where requested. The DSLs will work to establish strong and co-operative relationships with relevant professionals in other agencies.

Confidentiality and Information Sharing

We recognise that all matters relating to child protection are confidential. The DSLs will disclose any information about a student to other members of staff on a 'need to know' basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard our students. All staff must be aware that they cannot promise a student to keep secrets which might compromise the student's safety or wellbeing. Staff will, where appropriate, seek consent before sharing information. However, consent is not required where there is a lawful basis to share information for safeguarding purposes. Data protection legislation, including the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025, is not a barrier to sharing information where failure to do so may place a child at risk of harm. Decisions regarding information sharing will be made in line with the Information Sharing Advice for Practitioners and Working Together to Safeguard Children.

Curriculum and Staying Safe

We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

KIH and A21 will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

Systems have been established to support the empowerment of children to talk to a range of staff. Students at KIH and A21 will be listened to and heard, and their concerns will be taken seriously and acted upon, as appropriate.

Specific systems outside of expected day to day classroom interaction and support include:

- Anti-Bullying Policy
- [Childline Counsellor Chat](#)
- [CEOP](#) (Child Exploitation and Online Protection Centre)
- [Childline](#)
- [Childnet](#)
- [Internet Watch Foundation](#)
- Regular interaction and feedback with groups of students
- [Think U Know \(CEOP\)](#)
- [Virtual Global Taskforce](#)

E-Safety

It is recognised that the use of new technologies presents challenges and risks to children both inside and outside of school. KIH and A21 will work to ensure that e-safety is embedded in the curriculum and that students manage the associated risks effectively and will support parents, carers and mentors and the school community (including all members of staff) to become aware and alert to the needs of keeping children safe online. Updated information for parents, carers, mentors and students about keeping safe online is available on the school's Learning Management System, Canvas. Detailed information can be found in the school's e-Safety policy which can be found on the school's website.

Supervision and Support for Our Community

Any member of staff, student or other member of our school community, affected by issues arising from concerns for children's welfare or safety can seek support from the DSLs. Our school also has a designated Counsellor and SEN Services Wellbeing Lead who can support. Contact can be made by submitting a concern to MyConcern via the Teacher Hub. Students have different route to raise concerns – to their teachers/tutors, directly on email (the email address is available to all students), to school leaders. At Academy21, concerns can also be raised by students to their commissioning school or authority that retains the student on roll. The DSLs

can put to parents, carers, mentors and staff in touch with outside agencies for professional support if they so wish.

Complaints

The school has a Complaints Procedure available to parents, carers and mentors, students and staff who wish to report concerns. This document can be found on the school's website. All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in accordance with the school's procedures. Detailed information regarding allegations against staff can be found in the school's Managing Allegations Against Staff Members policy.

Safer Recruitment

KIH and A21 are committed to ensuring that all steps are taken to recruit staff, contractors and volunteers who are safe to work with our students and have their welfare and protection as the highest priority. The Executive Headteacher is responsible for ensuring that the school follows safer recruitment processes outlined within the school's Safer Recruitment procedures, including accurate maintenance of the Single Central Record; and an application, vetting and recruitment process which places safeguarding at its centre, regardless of staff or voluntary role.

Security

All staff have a responsibility for maintaining awareness of security surrounding the online platforms used by the school community, and for reporting concerns that may come to light. We operate within a whole-school community ethos and welcome comments from students, parents, carers and mentors and others about areas that may need improvement as well as what we are doing well.

Both staff and students are provided with their own login details and email address under the schools' domains. Students will require unique login details to access the school's learning management system. Staff require unique login details to access all school platforms. Passwords to these accounts should not be shared with anyone else and the member of staff or student should be the sole user of their account(s).

The school will not accept the behaviour of any individual (parents, mentors or other) that threatens school security or leads others (child or adult) to feel unsafe or intimidated. This is inclusive of interactions via the live classroom, via other school platforms, or on an external forum such as social media. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school platforms. The presence of 'unauthorised' users/guests and any suspicious activity may be reported to the police, particularly where a criminal offence has taken place. Abusive, intimidating or threatening behaviour from an individual (parents, mentors or other) may result in the termination of the contract between the school and family. This will be carried out at the discretion of the school.

Social Media

Instances do occur where students attempt to 'add' or send 'friend requests' to staff on social media. At KIH and A21, it is prohibited for staff to engage with students on social media platforms. Staff may accept 'friend requests' from students who were in Year 13, no less than 6 months after they have graduated from the school - this would be the January of the following year. This is a decision for the staff member to take. Staff must not accept 'friend requests' from students in any other year groups who leave the school.

Guest Speakers

On occasions, external guest speakers will be invited to address students. KIH and A21 welcome different insights and perspectives from guest speakers. Our external speakers are briefed in advance with regards to our expectations of what is suitable, and advised not to encourage any presentation or information that does not align with the School's British values, for example, forms of extremism or radicalisation. Where appropriate, the school will request that visiting speakers provide copies of materials they will use to the school in advance of the talk. Staff arranging such talks should speak with the Executive Headteacher and/or the DSL if they have any

reservations about the appropriateness of a speaker. A risk assessment may be drawn up, as appropriate, and while most speakers will be invited to speak in live sessions, speakers deemed high risk may be invited to speak in recorded sessions which can be reviewed before release.

International Safeguarding

With students in more than 100 countries around the world, all with variations in safeguarding laws and processes, it is a difficult landscape to navigate for KIH. Our safeguarding team has worked with the Foreign, Commonwealth and Development Office, and other international organisations to support safeguarding incidents in other countries. We can make it clear to families, from the outset, that our school values align with the UN Convention for the Rights of the Child, which does not support physical chastisement of children or any other forms of maltreatment.

As a school team, our main role is to report any concerns, however small, to our safeguarding team. The safeguarding team will take any concerns forward and report these to the relevant authorities where appropriate.

Contextual Safeguarding

There are many factors outside of school that can influence safeguarding incidents or behaviours. When looking into safeguarding incidents or behaviours, all staff – particularly the DSL – should consider the wider context. School staff are key in providing as much information as possible during the referral process, to allow assessment of any abuse to be in a holistic context, considering the safeguarding background of the child and all the available evidence.

Appendix 1 - Specific Safeguarding Issues

Staff must be aware of the following specific safeguarding issues. These issues are presented based on the legal and social context of the UK. For students outside the UK, we understand that there may be differences in approach in defining these safeguarding issues and in supporting students subject to them. We follow the UN Convention on the Rights of the Child to ensure our approach to each student is consistent with their legal and social framework.

Child-on-Child Abuse (previously referred to as peer-on-peer abuse)

Staff should be aware that children can abuse other children. All staff should understand that even if there are no reports in their schools or colleges, it does not mean it is not happening; it may be the case that it is just not being reported. It is essential that all staff understand that downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

Examples of child-on-child abuse include: all types of bullying, upskirting, abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’), consensual and non-consensual making or sharing of nudes and seminudes physical abuse, which may also involve an online element that facilitates, threatens and/or encourages physical abuse; and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment.

Our school’s safeguarding policy, behaviour policy and anti-bullying policy are in place to support us if these incidents occur.

Upskirting

Although much less likely to occur in an online school environment, our school recognises that upskirting is a criminal offence and we will take any allegations of such behaviour very seriously.

Upskirting typically involves taking a picture up or under a person’s clothing without them knowing. The picture is taken with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. When an allegation of upskirting is brought to our attention we will respond as we would for any other disclosure of potential abuse. We will follow the principles as set out in responding to reports of sexual violence and harassment and will take advice from the police and/or another relevant agency on how to progress any allegation of upskirting. Where any suspect for a case of upskirting is identified as being a pupil at our school we will initially be guided by police but will always seek to support that pupil in accordance with the principles set out in this policy.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse, including where they see, hear or experience its effects at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of these can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn. Both A21 and KIH are part of Operation Encompass, a national initiative where police have a statutory duty to notify a child’s education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. The designated safeguarding lead is responsible for leading on all safeguarding and child protection matters within an educational setting and are responsible to making safeguarding referrals to appropriate agencies.

Sexual Exploitation of Children

Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) which may be in exchange for something the victim needs or wants, and/or (b) which may be for the financial advantage of increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact. It can also occur with technology.

A significant number of children who are victims of exploitation go missing from home, care and education at some point. Some of the following signs may be indicators:

- children who have unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who have older girlfriends or boyfriends
- children who suffer from sexually transmitted infections
- children who suffer from changes in emotional wellbeing
- children who misuse drugs or alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

Child sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the DSL.

Child Criminal Exploitation (CCE)

KIH and A21 staff are aware that the criminal exploitation of children is a geographically widespread form of harm which:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- can be committed or facilitated by an organised network or gang, and victims may identify as part of this group.
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

Guidance about criminal exploitation of children is available in [Criminal Exploitation of Children and Vulnerable Adults](#). This guidance outlines what signs to look for in potential victims, and what to do about it. The document is a supplement to existing safeguarding policies, to help identify and protect those exploited through this criminal activity.

If a staff member develops concerns that a student is being drawn into criminal exploitation, this should be reported to the DSL who will, where appropriate, make referrals through the National Referral Mechanism in the UK, or an equivalent mechanism overseas.

Financially Motivated Exploitation and Sextortion

Staff should be aware that children may be targeted by individuals or organised groups seeking financial gain through coercion, threats, deception or blackmail. This may include online fraud, phishing, financial scams, cryptocurrency schemes or sextortion.

Sextortion is a form of child sexual abuse where an individual threatens to share sexual images or information about a child unless money, further images or other demands are met.

Any concerns relating to sextortion or financially motivated exploitation should be reported immediately to the DSL.

Serious Violence

All staff should be aware of signs which may indicate that children are involved with, or at risk from, serious violent crime. These may include, but are not limited to increased absence, significant changes in friendships or relationships with older individuals or groups, a 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 could also indicate that children have been approached by, or are involved with, individuals who could put the child at risk.

Risk factors which increase the likelihood of being involved in serious violence include being male, frequent absences, disrupted education (suspensions, permanent exclusions, time in alternative provision) experience of being maltreated as a child and being involved in offending.

Advice for schools and colleges is provided in the [Home Office Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

Mental Health

All staff should be aware that issues with mental health may indicate a child who is at risk or is suffering abuse, neglect or exploitation. Staff should observe and be aware of children's day-to-day behaviours to identify those who may be at risk or are experiencing mental health difficulties. However, diagnosis of mental health problems should only be made by trained professionals.

Staff must be aware of how a child's experience of abuse, neglect or other traumatic childhood experiences may impact negatively upon their mental health, behaviour and education. All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. Any mental health concerns that are also safeguarding concerns should be reported to the DSL by following the school's child protection policy.

If a child is struggling with their mental health, self-harming or is experiencing suicidal ideation there are likely to be potential warning signs which staff are well placed to recognise.

These could include:

- significant changes in behaviour
- , • ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention

Advice is available from the DfE on [Preventing and Tackling Bullying](#) and [Mental Health and Behaviour in Schools](#).

Gang Involvement and Criminal Activity

Staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime, either through participation in or as victims of gang violence. These may include:

- becoming withdrawn from family
- a change in friendships or relationships with older individuals or groups
- a sudden loss of interest in school – decline in attendance or academic achievement
- using new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason
- a sudden change in appearance, including dressing in a particular style or 'uniform'
- a new nickname
- signs of assault or unexplained injuries
- increased use of social networking sites
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs
- expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past
- expressing fear about entering certain areas or being concerned by the presence of unknown youths in their neighbourhood

Staff need to be able to identify the signs and indicators of these and share their concerns immediately with the DSL. The DSL will normally consult the child's parents, carers and mentors. If the child is based in the UK, the DSL will contact the Local Authority's Children's Social Care Service or police for the area in which the child is currently located. For children based overseas, an equivalent organisation may be sought.

Radicalisation

The UK Government defines radicalisation as the process of a person legitimising support for, or use of, terrorist violence. KIH and A21 recognises its duty to help prevent young people to be drawn into extremist viewpoints and radicalisation. In the UK, the Prevent Duty is the duty in the Counterterrorism and Security Act 2015 on specified authorities including schools to have due regard to the need to prevent people from becoming terrorists or supporting terrorism. There is no single way of identifying an individual who is likely to be susceptible to radicalisation, but there are number of early indicators of radicalisation or extremism, which may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views

- advocating violence towards others.

Members of staff who have concerns about a student will make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to the most appropriate course of action, which is likely to involve informing the parent, carer or mentor of the child. For students in the UK, the DSL may make a referral to the Channel programme, which is a programme that focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. For students overseas, an equivalent organisation may be identified.

The school will work more generally to ensure the fundamental British values of democracy, rule of law, mutual respect and tolerance are celebrated and not undermined. Non-emergency advice for staff is available via the DfE's helpline +44 (0)20 7340 7264 and by email at counter-extremism@education.gsi.gov.uk.

Honour-based Violence

So-called 'honour-based' violence encompasses crimes which have been committed to protect and defend the honour of the family and/or a community. These crimes should be dealt with as part of existing child safeguarding/protection structures, policies and procedures. The following practices are illegal in England:

Female Genital Mutilation

Honour based violence includes the physical act of Female Genital Mutilation (FGM). This is a form of child abuse and a method of violence against women and girls which is recognised by UNICEF as an internationally recognised human rights violation. More information on this can be found on the UNICEF website here. Members of staff have a mandatory duty to report suspected cases of FGM in England, Wales and Northern Ireland. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. DSLs will support members of staff throughout this process, and liaise with relevant agencies, commissioners and parents/carers (where appropriate).

Forced Marriage

A forced marriage is one entered into without the full and free consent of one 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. A lack of free and full consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Forcing a person into a marriage is a crime in the United Kingdom. School staff can also contact the Forced Marriage Unit, if they need advice or information: contact +44 (0)20 7008 0151 or email fmunit@fco.gov.uk.

Appendix 2 - Indicators of Harm

To ensure any relevant information is not missed, the following is a fuller complement of indicators of harm that a child may have but may not necessarily be apparent in an online setting given that students choose not to use their webcam and may not be seen or will only be seen from the shoulders upwards while on their webcam. For fullness of clarity, examples of harm in all settings, for all ages, are detailed below.

Physical Harm

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.

a. Indicators in the child

Bruising:

It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Bruising in or around the mouth
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, handprints or a hairbrush
- Linear bruising at any site, particularly on the buttocks, back or face
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks to the upper arms, forearms or leg
- Petechial haemorrhages (pinpoint blood spots under the skin.)
- Commonly associated with slapping, smothering/suffocation, strangling and squeezing

Fractures:

Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the carers being aware of the child's distress. If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement

Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick.

Skull fractures are uncommon in ordinary falls, i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously.

Mouth Injuries:

Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate.

Poisoning:

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self-harm even in young children.

Fabricated or Induced Illness:

Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer. Possible concerns are:

- Discrepancies between reported and observed medical conditions, such as the incidence of fits
- Attendance at various hospitals, in different geographical areas
- Development of feeding/eating disorders, as a result of unpleasant feeding interactions
- The child developing abnormal attitudes to their own health
- Non-organic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause
- Speech, language or motor developmental delays
- Dislike of close physical contact
- Attachment disorders
- Low self esteem
- Poor quality or no relationships with peers because social interactions are restricted
- Poor attendance at school and under-achievement

Bite Marks:

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more diffuse ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

Burns and Scalds:

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.

Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid.

Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

The following points are also worth remembering:

- A responsible adult checks the temperature of the bath before the child gets in
- A child is unlikely to sit down voluntarily in a hot bath and cannot accidentally scald its bottom without also scalding his or her feet

- A child getting into too hot water of his or her own accord will struggle to get out and there will be splash marks

Scars:

A large number of scars or scars of different sizes or ages, or on different parts of the body, or unusually shaped, may suggest abuse.

- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Fear of parents, carers and mentors being contacted and fear of returning home
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of medical help
- Aggression towards others
- Frequently absent from school
- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury

b. Indicators in the parent/carer

- May have injuries on themselves, that suggest domestic violence
- Not seeking medical help/unexplained delay in seeking treatment
- Reluctant to give information or mention previous injuries
- Absent without good reason when their child is presented for treatment
- Disinterested or undisturbed by accident or injury
- Aggressive towards child or others
- Unauthorised attempts to administer medication
- Tries to draw the child into their own illness
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault
- Parent/carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids
- Observed to be intensely involved with their children, never taking a much-needed break nor allowing anyone else to undertake their child's care
- May appear unusually concerned about the results of investigations which may indicate physical illness in the child
- Wider parenting difficulties may (or may not) be associated with this form of abuse
- Parent/carer has convictions for violent crimes

c. Indicators in the family/environment

- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents, carers and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

Emotional harm can include seeing or hearing the ill-treatment of another - this is particularly relevant in relation to the impact on children of all forms of domestic abuse. It may also involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it must be noted that it can occur alone.

a. Indicators in the child

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment •
Aggressive behaviour towards others
- Child scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' - difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Self-harm
- Fear of parents, carers and mentors being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Chronic running away
- Compulsive stealing
- Air of detachment – 'don't care' attitude
- Social isolation – does not join in and has few friends
- Depression, withdrawal

- Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention
- Low self-esteem, lack of confidence, fearful, distressed, anxious
- Poor peer relationships including withdrawn or isolated behaviour

b. Indicators in the parent/carer

- Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse
- Abnormal attachment to child e.g. overly anxious or disinterest in the child
- Scapegoats one child in the family
- Imposes inappropriate expectations on the child e.g. prevents the child's developmental exploration or learning, or normal social interaction through overprotection
- Wider parenting difficulties may (or may not) be associated with this form of abuse

c. Indicators in the family/environment

- Lack of support from family or social network
- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents, carers and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because 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 caregivers)
- ensure access to appropriate medical care or treatment

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

a. Indicators in the child

Physical representation:

- Failure to thrive or, in older children, short stature
- Underweight
- Frequent hunger
- Dirty, unkempt condition
- Inadequately clothed, clothing in a poor state of repair
- Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold
- Swollen limbs with sores that are slow to heal, usually associated with cold injury

- Abnormal voracious appetite
- Dry, sparse hair
- Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent •
Head lice / scabies/ diarrhoea
- Unmanaged / untreated health / medical conditions including poor dental health
- Frequent accidents or injuries
- Development:
 - General delay, especially speech and language delay
 - Inadequate social skills and poor socialization

Emotional/behavioural presentation:

- Attachment disorders
- Absence of normal social responsiveness
- Indiscriminate behaviour in relationships with adults
- Emotionally needy
- Compulsive stealing
- Constant tiredness
- Frequently absent or late at school
- Poor self esteem
- Destructive tendencies
- Thrives away from home environment
- Aggressive and impulsive behaviour
- Disturbed peer relationships
- Self-harming behaviour

b. Indicators in the parent/carer

- Dirty, unkempt presentation
- Inadequately clothed
- Inadequate social skills and poor socialisation
- Abnormal attachment to the child e.g. anxious
- Low self- esteem and lack of confidence
- Failure to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene
- Failure to meet the child's health and medical needs e.g. poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Wider parenting difficulties, may (or may not) be associated with this form of abuse

c. Indicators in the family/environment

- History of neglect in the family
- Family marginalised or isolated by the community
- Family has history of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents, carers and/or siblings of the family
- Family has a history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement
- Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
- Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating
- Lack of opportunities for student to play and learn

Sexual Abuse

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

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Upskirting would also be included in this category: Upskirting, which typically involves taking a picture under a person's clothing without them knowing to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (child on child abuse).

a. Indicators in the child

Physical presentation:

- Urinary infections, bleeding or soreness in the genital or anal areas
- Recurrent pain on passing urine or faeces
- Blood on underclothes
- Sexually transmitted infections
- Vaginal soreness or bleeding
- Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

Emotional/behavioural presentation:

- Makes a disclosure
- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- Self-harm - eating disorders, self-mutilation and suicide attempts

- Poor self-image, self-harm, self-hatred
- Reluctant to undress for PE
- Running away from home
- Poor attention / concentration (world of their own)
- Sudden changes in schoolwork habits, become truant
- Withdrawal, isolation or excessive worrying
- Inappropriate sexualised conduct
- Sexually exploited or indiscriminate choice of sexual partners
- Wetting or other regressive behaviours e.g. thumb sucking
- Draws sexually explicit pictures
- Depression

b. Indicators in the parent/carer

- Comments made by the parent/carer about the child
- Lack of sexual boundaries
- Wider parenting difficulties or vulnerabilities
- Grooming behaviour
- Parent is a sex offender

c. Indicators in the family/environment

- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents, carers and/or siblings of the family
- History of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement
- Family member is a sex offender

Child Protection Contact Tree

The following contacts should be contacted strictly in the order listed below:

King's InterHigh

- Bethan Shafiq & Kate Hurley – Designated Safeguarding Leads
- 1. Catriona Olsen – Executive Headteacher
- 2. Head of Key Stage DSLs
- 3. Jez Prior – Global Safeguarding Lead

Academy21

- Amy Husband - Executive Headteacher
 - a) if unavailable, Heads of Subject must immediately refer incidents to mentors
- Clare Semple – Deputy Headteacher
- Jez Prior – Global Safeguarding Lead

****Allegations against staff members: The Designated Safeguarding Lead and Executive Headteacher, or the CEO where the Executive Headteacher is the subject of the allegation should be informed if there is an allegation against a staff member. Where there is an allegation against the DSL, the Executive Headteacher should be informed without informing the DSL first. Where necessary, the Company will use an outside consultant to ensure impartiality.**

Finding UK Authority Contact Details

If you think a child or young person is at risk or being abused or neglected, contact the [children's social care team at their local council](#). If you do not know where they live, contact your local council's team, the [NSPCC](#) or the Police for advice.

Finding an Authority Helpline Outside the UK

[Child Helpline International](#) is a collective impact organization with 155 members from 133 countries and territories around the world.

They coordinate information, viewpoints, knowledge and data from our child helpline members, partners and external sources. This exceptional resource is used to support child protection systems globally, regionally and nationally, and to help our members advocate for the rights of children and amplify their voices.

Every year, child helplines around the world field more than 13 million individual calls and provide counselling services to almost 3 million children and young people.

Referrals for Overseas Students

In the first instance, we will endeavour to contact the relevant foreign embassy or High Commission of the country in question to identify the relevant local / district authority and, in turn, the children's services / safeguarding agency involved to discuss the case concerned. Initially, this involves utilising the [London Diplomatic List](#).

We recognise that laws and approaches in countries outside the UK may be different, so this must be considered prior to making a referral to the country in question. We must also consider any potential repercussions for the child or family on the basis of a referral. If we feel the consequences of a referral may negatively outweigh the reporting, the school may consider not to report the issue at that time and continue to monitor the student. Investigations and discussions around the laws of the country in question, along with the potential risk to the child, may be discussed as the school's safeguarding panel prior to a referral being made.

Appendix 3: Safeguarding Arrangements When Student Access is Restricted Due to Unpaid Fees *KIH only

Our Commitment to Student Welfare

At King's InterHigh, the welfare of every child remains our highest priority. A student's access to lessons and learning resources may be restricted if fees remain unpaid in accordance with the school's Terms and Conditions. However, while a student remains on roll, the school continues to have safeguarding responsibilities towards that child. This reflects our commitment to protecting students and promoting their welfare at all times.

What Happens if Access is Restricted?

If a student's account is restricted:

- The student will be unable to access live lessons, learning materials, and other school resources.
- The student remains on the school roll unless they are formally withdrawn.
- Parents or carers remain responsible for ensuring that their child receives suitable education and appropriate supervision during this period.
- The school may carry out welfare checks where appropriate to ensure the student is safe and receiving support.

The School's Safeguarding Role

Where a student is unable to access their education because of an account restriction, the safeguarding team may:

- Review any existing welfare, safeguarding or special educational needs information held by the school.
- Contact parents or carers to discuss the student's welfare and educational arrangements.
- Offer signposting to appropriate support services where needed.
- Work with relevant agencies where safeguarding concerns arise.

Parents' and Carers' Responsibilities

Parents and carers are responsible for:

- Maintaining communication with the school regarding outstanding fees and any difficulties affecting payment.
- Ensuring their child continues to receive suitable education if they are unable to access King's InterHigh lessons.
- Informing the school of any welfare concerns, changes in circumstances, or alternative educational arrangements.
- Responding to reasonable welfare enquiries made by the school.

Children Absent from Education

The school has safeguarding duties in relation to children who are not accessing education. In some circumstances, UK schools are expected to share information with local authorities where a compulsory school-aged child is not receiving suitable education or where there are concerns regarding a child's welfare.

For students who reside outside the UK, the school will consider local safeguarding requirements and may seek advice from relevant agencies where necessary.

Support Available

If your family is experiencing circumstances that may affect your child's safety, wellbeing or continued education, we encourage you to contact the school as early as possible so that appropriate support can be considered.

Safeguarding Team: safeguarding@kingsinterhigh.co.uk

Key Principle

The restriction of access for financial reasons does not remove the school's commitment to safeguarding children while they remain enrolled. We will continue to act in the best interests of the child and take appropriate action where we have concerns about a student's welfare or educational provision.