Bowden House School & Bowden Primary School

Safeguarding & the Protection of Children Policy

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To be agreed by the schools' governing body and minuted at its meeting.
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Statement of intent

Bowden House School & Bowden Primary School are committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students/pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- ensuring that members of the Governing Body, the Headteacher, Head of School and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL
- teaching students/pupils how to keep safe and recognise behaviour that is unacceptable
- identifying and making provision for any student/pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children
- Ensuring that the Headteacher, Head of School and any new staff are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL is for Bowden House School, Neil Wells, Headteacher. In the absence of the DSL, child protection matters will be dealt with by the Deputy DSLs, Miranda Wells, Rob Hopkins, Stacey Wall, Victoria Bastock and Lindsey Haworth. For Bowden Primary School, Alexandra Tytgat, Head of School, is the DSL and the Deputy DSL is Jack Newling

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial Intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child Criminal Exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child Sexual Exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data Protection Officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated Safeguarding Lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, Health and Care Plan	A funded intervention plan which coordinates the educational, health and care needs for students/pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the student/pupil.

ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female Genital Mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' Abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping Children Safe in Education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local Authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after Children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi Academy Trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously Looked After Children	Children who were looked after by a local authority and ceased to be looked after as a result of adoption, a special guardianship order or a child arrangements order, including qualifying children adopted from state

		care outside England and Wales. Care leavers are a distinct group.
PSHE	Personal, Social and Education	A non-statutory subject in which students/pupils learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
RSHE	Relationships, Sex and Health Education	A compulsory subject from Year 7 for all students/pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior Leadership Team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

Definitions

The terms **"children"** and **"child"** refer to anyone under the age of 18.

For the purposes of this policy, **"Safeguarding and the Protection of Children"** is defined as:

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

For the purposes of this policy, **"consent"** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a student/pupil's dignity, make them feel intimidated, degraded or humiliated and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance and sexualised name-calling
- sexual “jokes” and taunting

physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.

Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:

- the consensual and non-consensual sharing of nude and semi-nude images and/or videos
- sharing unwanted explicit content
- upskirting
- sexualised online bullying
- unwanted sexual comments and messages, including on social media
- sexual exploitation, coercion, and threats.

For the purposes of this policy, **“upskirting”** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including students/pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the “consensual and non-consensual sharing of nude and semi-nude images and/or videos”, colloquially known as “sexting”, and collectively called “youth-produced sexual imagery” is defined as the creation of sexually explicit content by a person under the age of 18 that is shared with another person under the age of 18. This definition does not cover persons under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

“Deep fakes” and “deep nudes” refer to digitally manipulated and AI-generated nudes and semi-nudes. For the purposes of this policy, “indecent imagery” is defined as an image which meets one or more of the following criteria:

• Nude or semi-nude sexual posing

• A child touching themselves in a sexual way

• Any sexual activity involving a child

• Someone hurting a child sexually

• Sexual activity that involves animals

Indecent images also include indecent “pseudo-images,” which are images that have been created or manipulated using computer software and/or AI.

1. **Legal framework**

Bowden House School and Bowden Primary School have regard to current safeguarding legislation and statutory guidance, including Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.

Legislation

- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data (Use and Access) Act 2025
- Data Protection Act 2018
- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. This applies to Bowden primary only
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- School Attendance (Pupil Registration) (England) Regulations 2024

Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2026) 'Working Together to Safeguard Children 2026'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Keeping children safe in education 2026'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2025) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
  Home Office and DfE (2026) 'Operation Encompass: statutory guidance'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2024) 'Working together to improve school attendance'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'
- DfE (2025) 'Filtering and monitoring standards for schools and colleges
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'

This policy operates in conjunction with the following school policies:

- Behaviour & Behaviour Management
- Anti-bullying – Feeling Safe & Happy in School
- Safer Recruitment & Selection
- Procedures for Managing Allegations of Abuse Against Staff Working in Children's, School and Family Settings, (LBTH)
- Child Protection Procedures for Staff Working in Children's, School and Family Settings, (LBTH)
- Policy Statement on the Recruitment of ex-offenders
- Disclosure & Barring Service checks
- Absconding Procedures including RMFHC protocols and procedures
- ICT Acceptable Use (staff)
- Safe, Acceptable & Effective Use of the Internet for staff and students/pupils
- Code of Conduct
- Complaints (students/pupils)
- Complaints (others)
- Bullying & Harassment – staff
- Child-on-child Abuse
- Exclusions Guidance for Parents
- Whistleblowing
- Whistleblowing for Students
- Privacy & Confidentiality
- Physical Activity
- Drug Education
- Sex & Relationships
- Mental Health & Behaviour in Schools
- Health & Safety
- Fire Safety & Evacuation
- First Aid & Medicine Administration
- Risk Assessments
- Compatibility Assessment
- Barred Teachers' List
- Single Central Record

- Disaster Plan
- Data Protection
- Data Retention
- Live on-line
- E-safety
- Attendance & Absence
- LAC
- Prevent Duty & Preventing Violent Behaviour & Violent Extremism in Tower Hamlets
- Child Sexual Exploitation (CSE) (incorporated in this Policy)
- Remote Learning Protocols
- Visitors Policy & Leaflet

2. **Roles and responsibilities**

All staff of Bowden House School & Bowden Primary School have a responsibility to:

- consider, at all times, what is in the best interests of the student/pupil
- maintain an attitude of 'it could happen here' where safeguarding is concerned
- provide a safe environment in which students/pupils can learn
- be prepared to identify students/pupils who may benefit from early help
- be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction
- be aware of the role and identity of the DSL and deputy DSLs
- undertake safeguarding training, including online safety training, (which amongst other things, includes an understanding of and the expectations and responsibilities relating to, filtering and monitoring) - this will be regularly updated
- receive and understand child protection and safeguarding (including online safety) updates, e.g., via email, as required and at least annually
- be aware of the local early help process and understand their role in it
- be aware of, and understand, the process for making referrals to CSCS.
- make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child
- support social workers in making decisions about individual children, in collaboration with the DSL
- be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected
- be aware that a student/pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.

Staff should recognise that a child may experience prejudice-based harm and may not disclose it directly. Any concern should be shared promptly with the DSL.

- promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- avoid victim-blaming attitudes and challenge it in a professional way if it occurs.

- maintain appropriate levels of confidentiality when dealing with individual cases
- reassure victims that they are being taken seriously, that they will be supported and that they will be kept safe
- speak to the DSL or DSLs if they are unsure about how to handle safeguarding matters
- be aware of safeguarding issues that can put students/pupils at risk of harm
- be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education and sharing indecent images, and other signs that students/pupils may be at risk of harm.

Staff should recognise that safeguarding risks can overlap, including mental health concerns, domestic abuse, criminal and sexual exploitation, child-on-child abuse, serious violence, and harmful online content. Mental health concerns may themselves develop into a safeguarding issue. Staff will follow the school's procedures for unauthorised absence and raise safeguarding concerns with the DSL.

The Headteacher and the Education Team of Bowden House School & the Head of School and Education Team of Bowden Primary School accepts their responsibility to:

- safeguard students/pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'
- personally report any cases to the Police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible

The Head of Student Welfare & the Student & Family Co-ordinator at Bowden House School and the SEMH Practitioner together with all other members of the non-teaching teams accept their responsibility to:

- safeguard their students/pupils' wellbeing at all times as part of their professional duties

The Governing Body of Bowden House School and Bowden Primary School will discharge its duty to:

- take strategic leadership responsibility for the school's safeguarding arrangements
- ensure that the school complies with its duties under the above child protection and safeguarding legislation
- guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times
- guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Ensure the use of reasonable force and restrictive interventions is in place and that appropriate cyber security arrangements protect pupils and school systems.
- confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures
- understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the school's policies and procedures
- comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.

- ensure that all staff who work directly with children read Part One of Keeping Children Safe in Education 2026 in full
- ensure that all other staff, including staff who do not work directly with children, also read Part One of Keeping Children Safe in Education 2026 in full; the overview is supplementary and does not replace Part One
- ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children. At Bowden House School and Bowden Primary School, all staff are kept up-to-date on any changes in safeguarding policies & procedures via e-mail and regular training
- ensure that there are members of the SLT are appointed as DSLs: the Headteacher of Bowden House School and the Head of School Bowden Primary are the appointed DSLs
- ensure that there are appointed Deputy DSLs for both schools: Bowden House School has 5 Deputy DSLs and Bowden Primary has 1 Deputy DSL. They are aware that it is their duty to provide support to the DSL and are trained to the same standard as the DSL
- ensure that Bowden House School & Bowden Primary School have a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- where there is a safeguarding concern, all staff will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide and will share the information on a need-to-know basis
- Bowden House School & Bowden Primary School have systems in place for students/pupils to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible
- ensure that all staff will have due regard to relevant data protection principles that allow them to share and withhold personal information
- ensure that a member of the Governing Body is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headteacher or another Governor. The Chair of Governors for Bowden House School is the nominated Safeguarding Link Governor
- guarantee that there are effective and appropriate policies and procedures in place
- ensure all relevant persons are aware of the school's local safeguarding arrangements, including the Governing Body itself, the SLT and DSLs. Both schools have a flowchart detailing the points of contact in the event of a safeguarding issue
- ensure that the senior leader responsible for filtering and monitoring, supported by the DSL and technical staff, reviews the effectiveness of these systems at least once each academic year, records the findings and acts on identified risks.
- make sure that students/pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum. All students/pupils have a leaflet detailing what to do they have safeguarding concerns. Safeguarding and keeping safe is also heavily promoted in RSHE lessons and less formally at Bowden House School with the Care Team

- adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required. All staff in both schools are subject to Enhanced Disclosure & Barring checks; verified references and accounts for gaps in employment
- ensure that staff are appropriately trained to support students/pupils to be themselves at school, e.g., if they are LGBTQ+. This is covered within the curriculum in RSHE classes and any discrimination, challenged by all staff
- ensure the school has clear systems and processes in place for identifying possible mental health problems in students/pupils, including clear routes to escalate concerns and clear referral and accountability systems. Bowden House School has a full-time Highly Specialist CAMHS Practitioner who supports the students in this area
- make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required but at least annually.
- certify that there are procedures in place to handle allegations against staff. Both schools adopt the LBTH procedures
- confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned
- guarantee that there are procedures in place to handle students/pupils' allegations against other students/pupils. Both schools share a Child-on-child Abuse Policy and Complaint Procedures
- ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students/pupils and staff. All staff have to sign a Code of Conduct and students/pupils' behaviour procedures are covered in the schools' Behaviour & Behaviour Management Policy
- ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse
- guarantee that there are systems in place for students/pupils to express their views and give feedback. Each student at Bowden House School has a Mentor and they have daily contact to share any concerns. Bowden House School has an active Student Council
- establish an early help procedure and ensure all staff understand the procedure and their role in it
- appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- ensure that Pupil Premium and Pupil Premium Plus supports the LAC. Both schools share a Speech & Language Therapist paid for via Pupil Premium
- make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements. Bowden House School and Bowden Primary School supports students/pupils with SEN. They are all vulnerable and details on contacts, etc are known by all staff
- put in place appropriate safeguarding responses for students/pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse, neglect

or exploitation, and prevent the risk of their disappearance in future. Both schools have an Absconding Procedure including RMFHC protocols and procedures

- put in place appropriate safeguarding responses for students/pupils who become absent from education, particularly on repeated occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation and prevent the risk of their disappearance in future
- ensure that all members of the Governing Body have been subject to an enhanced DBS check. All Governors are subject to Enhanced DBS checks
- create a culture where staff are confident to challenge senior leaders over any safeguarding concerns. Both schools have a Whistleblowing Policy which informs staff on how to proceed if they have safeguarding concerns relating to colleagues, including the SLT
- In addition to the Governing Body's statutory duty to review safeguarding arrangements annually, the school may choose to commission an **independent safeguarding audit** once per year as a matter of best practice.
- Any recommendations arising from the audit will be considered by the Governing Body and, where appropriate, incorporated into the school's safeguarding improvement plan.

The Headteacher has a duty to:

- ensure that the policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff
- provide staff with the appropriate policies and information upon induction. There is a robust Induction Programme including Safeguarding Awareness training for every member of staff. Any new or up-dated policies are circulated via e-mail

The DSL, the Headteacher of Bowden House School and the DSL, Head of School, Bowden Primary, have a duty to and do undertake to:

- take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place
- provide advice and support to other staff on child welfare, safeguarding and child protection matters
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- contribute to the assessment of children and/or support other staff to do so
- during term time, be available during school hours for staff to discuss any safeguarding concerns.
- arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- will agree named deputy cover when absent, including term-time and out-of-hours arrangements for the residential setting, and ensure all staff know whom to contact.

Refer cases:

- to CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS

  - to the Channel programme where radicalisation concerns arise and support staff who make referrals to the Channel programme
  - to the DBS where a person is dismissed or has left due to harm or risk of harm, to a child
  - to the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the deputy DSL(s) to ensure effective safeguarding outcomes
- liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff
- liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety
- liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the Highly Specialist CAMHS Practitioner where safeguarding concerns are linked to mental health
- promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances. All staff at both schools engage actively with parents/carers and are skilled in identifying safeguarding concerns
- ensure that child protection information is only accessed by those who need to do so
- ensure that information on any student/pupil of a child protection nature is included in their file if they transfer to a new school and/or LA, and consider any additional information that should be shared
- ensure the child protection file will be sent securely to the new school or college as soon as possible: within five days of an in-year transfer or within the first five days of a new term. The file will be separate from the main pupil file; the DSL will obtain confirmation of receipt and consider whether safeguarding information should be shared in advance.
- ensure each member of staff has access to and understands the school's Safeguarding & the Protection of Children Policy and procedures – this is discussed during the staff induction process
- work with the Governing Body to ensure the school's Safeguarding & the Protection of Children Policy is reviewed annually, and the procedures are updated and reviewed regularly. Up-dated Policy is presented to the Governing Body and all staff on an annual basis
- ensure the school's Safeguarding & the Protection of Children Policy is available publicly. The policy is available to parents/carers and members of the public on the school's website
- undergo training and update this training at least every two years.
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to students/pupils and taking account of their wishes and feelings; this includes understanding the difficulties students/pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication

- support and advise staff and help them feel confident on welfare, safeguarding and child protection matters specifically, to ensure that staff are supported during the referrals processes and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support
- understand the importance of information sharing, including within school, with other schools and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR
- keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping. All safeguarding concerns in both schools are recorded on BehaviourWatch and checked on a daily basis
- keep child protection records accurate and up to date, recording concerns, decisions, reasons, referrals and outcomes and checking that agreed actions have been completed

The Designated Teacher has a responsibility for promoting the educational achievement of LAC and previously LAC (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

3. **Multi-agency working**

Bowden House School and Bowden Primary School contribute to multi-agency working as part of their statutory duty. Both schools are aware of and follow the local safeguarding arrangements.

Both schools will engage in local safeguarding arrangements and cooperate with the safeguarding partners in accordance with the published arrangements.

The schools will work with CSCS, the police, health services and other services to protect the welfare of its students/pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

Where a child may benefit from Family Help, the DSL will follow the relevant local multi-agency assessment and referral route, work with the family and partner agencies as appropriate, and review whether statutory assessment is needed.

The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

Information sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students/pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student/pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students/pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

The school will have clear processes for sharing information internally and with children's social care, safeguarding partners and other practitioners when required. Staff will share relevant information promptly and securely, documenting the decision and rationale; data protection law does not prevent proportionate sharing to protect a child.

4. **Early Help**

Early Help means providing support as soon as a problem emerges, at any point in a child's life. Any student/pupil may benefit from early help but in particular, staff will be alert to the potential need for early help for students/pupils who:

- have SEND, regardless of whether they have a statutory EHC plan
- have mental health needs
- are young carers
- show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are frequently missing or going missing from care or from home
- are at risk of modern slavery, trafficking, or sexual or criminal exploitation
- are at risk of being radicalised or exploited
- have family members in custody or are affected by parental offending
- are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
- misuse drugs or alcohol.
- are at risk of HBA, such as FGM or forced marriage
- are privately fostered
- are persistently absent from education, including persistent absences for part of the school day
- show early signs of abuse and/or neglect in other ways.

The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from early help, for example, if they are:

- bereaved.

- viewing problematic or inappropriate online content or developing inappropriate relationships online.
- have recently returned home to their family from care.
- missing education, or are persistently absent from school, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL. The DSL (Headteacher) will take the lead where early help is appropriate with support from the DSLs. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required. Bowden House School and Bowden Primary follow the Early Help procedures for LBTH.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

5. **Abuse, neglect and exploitation**

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities,

such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff are aware that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another; therefore, staff are vigilant and always raise concerns with the DSL or other members of the SLT. All staff, especially the DSL and deputy DSL(s), are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that students/pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff are aware of the appropriate action to take following a student/pupil being identified as at potential risk of abuse and in all cases, will speak to the DSL if they are unsure.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying and the sharing of indecent images. All staff will also recognise that abuse or neglect of a child may occur not only through the infliction of harm, but also through a failure to act to prevent harm. Harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others. Particular attention will be paid to the effects of **domestic abuse** on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences.

6. **Child-on-child abuse**

For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Safeguarding & the Protection of Children Policy and the Child-on-child Abuse Policy.

All staff will be aware that child-on-child abuse can occur between students/pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

Staff will challenge misogyny and misandry, including harmful online influences, and will discuss concerns about a child's exposure to this content with the DSL.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as “banter” or “part of growing up”.

Child-on-child abuse can be manifested in many different ways, including:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying
- abuse in intimate personal relationships between peers
- physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse
- sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence
- sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Child-on-child abuse may include discriminatory behaviour and prejudice-based harassment, including harmful behaviour connected with race, sex, disability, religion or sexual orientation.
- causing someone to engage in sexual activity without consent
- the consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- upskirting.
- initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the school’s policies and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff are made aware of the heightened vulnerability of students/pupils with SEND, who, evidence suggests, are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the students/pupil’s SEND and will always explore indicators further.

All staff are also aware of the heightened vulnerability of LGBTQ+ students/pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, students/pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ students/pupils. The school’s response to sexual violence and sexual harassment between students/pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

Students/pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Students/pupils will also be reassured that they will be taken seriously, be supported, and kept safe. All students/pupils have a leaflet on child-on-child abuse.

The school recognises that some pupils are particularly vulnerable and at increased risk of child-on-child abuse. Evidence suggests that children with SEND or certain health conditions are around three times more likely to be abused by their peers, may face additional safeguarding challenges, and may be more prone to group isolation or bullying (including

prejudice-based bullying). The school will consider providing extra pastoral support for those children.

All pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. Particular consideration will be given to pupils who are more vulnerable to being bullied, those who are looked after, and those living in unsupportive home situations.

The DSL will ensure that all incidents of child-on-child abuse are appropriately assessed, including cases of image-based abuse, to confirm whether the alleged perpetrator is under the age of 18 or an adult posing as a child. Where there is any indication that an adult may be involved, the DSL will immediately make a referral to the relevant safeguarding partners and the police.

The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-Bullying Policy and Exclusion Policies, where relevant.

7. **Domestic abuse**

For the purposes of this policy and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g., the person's child) where both are aged 16 or over and are personally connected. **"Abusive behaviour"** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **"Personally connected"** includes people who:

- are, have been or have agreed to be married to each other
- are, have been or have agreed to be in a civil partnership with each other
- are, or have been, in an intimate personal relationship with each other
- each have, or had, a parental relationship towards the same child
- are relatives.

Both schools recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff are aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Operation Encompass notifications about domestic abuse will be received securely by the DSL or trained key adult, recorded and used to plan timely support. Staff will assess any further safeguarding need and make referrals where appropriate; a notification does not replace the usual safeguarding and referral procedures.

8. **Homelessness**

The DSL and Deputy DSL(s) will be aware of the contact details and referral routes into the Local Housing Authority with the support of the Student & Family Co-ordinator at Bowden House and the SEMH Practitioner at Bowden Primary so that concerns over homelessness can be raised as early as possible. There is also likely to be involvement with Social Workers.

Indicators that a family may be at risk of homelessness include:

- household debt
- rent arrears
- domestic abuse
- anti-social behaviour
- any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

9. **Sexual relationships between students**

Bowden House School is a therapeutic residential setting for vulnerable students with social, emotional and mental health needs. While we understand that students may form emotional bonds with one another, we are clear that **sexual relationships between students while at school or in the residential setting are not appropriate**.

Through our PSHE and RSHE curriculum and the day-to-day guidance of staff, we teach students about **healthy, respectful, age-appropriate relationships**, the concept of **consent**, and their rights and responsibilities.

If a sexual relationship or inappropriate behaviour of a sexual nature between students becomes known to staff, we will take a **safeguarding-led and trauma-informed approach**, which may include:

- A risk assessment to determine the safety and wellbeing of those involved and any actions necessary
- Engagement with the **Designated Safeguarding Lead (DSL)**
- Involvement of the **Headteacher, Head of Residential**, keyworkers, CAMHS or therapeutic team
- Discussion with **families/carers and relevant professionals**
- Consideration of any **legal implications** (e.g. age of consent, sexual offences)
- Delivery of targeted support or intervention (e.g. education, supervision, support for recovery)

All incidents will be managed with sensitivity, in accordance with the **Safeguarding & Child Protection Policy**, and where necessary, referred to **Children’s Social Care** or the **police**

10. **Online safety and personal electronic devices**

Bowden House and Bowden Primary Schools will adhere to the ICT Acceptable Use Policy at all times.

As part of a broad and balanced curriculum, all students/pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- student/pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- the procedure to follow when they have a concern regarding a student/pupil's online activity.

Both schools will ensure that appropriate filtering and monitoring systems are in place on school devices and school networks to prevent students/pupils accessing inappropriate material. In line with statutory guidance, Bowden House and Bowden Primary Schools will ensure that their systems **meet the DfE's filtering and monitoring standards**. The schools will also ensure that the use of filtering and monitoring does not cause "over blocking", which may lead to unreasonable restrictions as to what students/pupils can be taught online. Bowden House School meets the filtering and monitoring standards via firewalls monitored by East Sussex ICT Service, and daily Smoothwall monitoring, which is accessed by the Headteacher and the Deputy Headteacher.

The senior leader with responsibility for filtering and monitoring, with the DSL and IT support, will review the approach and its effectiveness at least annually and report findings to the Governing Body.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the ICT Acceptable Use Policy.

Communicating with parents/carers

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for school.

Reviewing online safety

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras by staff and students/pupils is closely monitored by the school, in accordance with the Staff ICT Policy.

The school's approach is to maintain a mobile phone-free school day by default. The Headteacher will determine and document any individual exceptions, including where necessary for a pupil's medical condition or SEND, and staff will follow the applicable mobile device and online safety procedures.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the students/pupils' social workers, carers or adoptive parents/carers to assess the needs and risks associated with the students/pupils.

Staff will report any concerns about students/pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Staff training in online safety

As part of safeguarding training, all staff will receive guidance on the four categories of online risk, as outlined in *Keeping Children Safe in Education (KCSIE)*:

- **Content** – exposure to illegal, inappropriate, or harmful material, including but not limited to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, and conspiracy theories.
- **Contact** – harmful online interaction with other users, including grooming, exploitation, peer pressure, commercial advertising, and impersonation by adults posing as children.
- **Conduct** – online behaviours that may increase the likelihood of harm or result in actual harm, such as creating, sending or receiving explicit images, the distribution of explicit material, and online bullying.
- **Commerce** – risks associated with online commerce, including online gambling, inappropriate advertising, phishing attempts, and financial scams. Any concerns that pupils or staff may be at risk from such harms will be reported through appropriate safeguarding channels.

For incidents involving nude or semi-nude images or videos, including AI-generated images, see section 32.

11. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

12. Children missing or absent from education

A child missing from school may be at risk of abuse, neglect or exploitation. Staff will follow the school's absence and missing-child procedures immediately, make reasonable enquiries, inform the DSL and work with the relevant local authority in accordance with the current attendance and children-missing-education guidance.

Admissions register

Students/pupils are placed on the admissions register at the beginning of the first day that is agreed by the school or when the school has been notified that the student/pupil will first be attending. All students/pupils are referred via the SEN Department of the referring LAs.

The schools keep their admissions register up-to-date and accurate at all times. Two emergency contact details will be held for each student/pupil where possible. Staff will monitor students/pupils who do not attend the school on the agreed date and will notify the AWA of the placing authority at the earliest opportunity.

If a parent/carer notifies either of the schools that their child will live at a different address, the school will record the following information on the admissions register:

- the full name of the parent/carer with whom the student/pupil will live
- the new address
- the date from when the student/pupil will live at that address

If a parent/carer notifies the school that their child will be attending a different school because they are moving or have moved to another LA, the following information will be recorded on the admissions register:

- the name of the new school
- the date on which the student/pupil first attended or is due to attend, that school

Where a student/pupil moves to a new school, the school will use a secure internet system to securely transfer student/pupils' data.

The next section is for information only as all placements are made in conjunction with referring LAs and any changes of school placement are negotiated with the relevant LAs.

The school will remove a pupil from the admission register only where a ground in regulation 9 of the School Attendance (Pupil Registration) (England) Regulations 2024 applies, and will make the required notifications to the local authority. The school will not remove a pupil because they are refusing school or because the school considers that it cannot meet their needs. Any proposed change to the placement of a pupil with an EHC plan will be discussed with the responsible local authority before action is taken.

The school will work with the LA to establish methods of making returns for student/pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents/carers, e.g., where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

13. Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent/carer or anyone with legal responsibility for the child. Child abduction can be committed by parents/carers and other relatives, other people known to the victim and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with students/pupils.

Students/pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

14. Students/pupils potentially at greater risk of harm

Both schools recognise that some groups of students/pupils can face additional safeguarding challenges, both online and offline and understand that further barriers may exist when determining abuse and neglect in these groups of students/pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below

Students/pupils who need social workers

Students/pupils may need social workers due to safeguarding or welfare needs. These needs can leave them vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a student/pupil has a social worker in order to make decisions in the best interests of their safety, welfare and educational outcomes.

Where a student/pupil needs a social worker, this will inform decisions about safeguarding, e.g., responding to unauthorised absence and promoting welfare, e.g., considering the provision pastoral or academic support.

Home-educated children (for information)

Parent/carers may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

The school will notify the local authority of deletions from the admission register in accordance with the School Attendance (Pupil Registration) (England) Regulations 2024 and the applicable duties relating to pupils with EHC plans.

Where a parent/carer has expressed their intention to remove a student/pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parents/carers, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable and/or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously looked-after

children (PLAC) may also remain vulnerable after leaving care. Care leavers are a distinct group and may need ongoing support.

The Governing Body will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked After legal status, i.e., whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order
- Contact arrangements with parents/carers or those with parental/carer responsibilities.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the student/pupil

The DSL will be provided with the necessary details of students/pupils' social workers and the VSH and for PLAC, personal advisers

Students/pupils with SEND

When managing safeguarding in relation to students/pupils with SEND, staff will be aware of the following:

- certain indicators of abuse, such as behaviour, mood and injury, may relate to the student/pupil's disability without further exploration. However, it should never be assumed that a student/pupil's indicators relate only to their disability
- students/pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs.
- communication barriers may exist, as well as difficulties in overcoming these barriers. Staff will also consider communication needs, dependence on adults for care, intimate care needs and possible isolation. These factors can make it harder for a child to understand or report abuse. The school will offer accessible routes to disclose concerns and appropriate pastoral support.

When reporting concerns or making referrals for students/pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a student/pupil with SEND, the DSL will liaise with the school's SENCO, as well as the student/pupil's parents where appropriate, to ensure that their needs are met effectively.

Young carers. Staff will recognise that caring responsibilities can affect attendance, learning, behaviour and wellbeing. The DSL will identify support needs early and liaise with the family and relevant services where appropriate.

Pupils with medical conditions. An incident concerning the management of a medical condition, including an allergy, does not automatically require a safeguarding referral. The DSL will consider a referral if the incident raises concern that the pupil is at increased risk of neglect, abuse or exploitation, including where essential information or medication has repeatedly not been provided.

Pupils who are lesbian, gay or bisexual and pupils questioning their gender

The fact that a student/pupil may be LGBTQ+ is not in itself an inherent risk factor for harm. However, staff will be aware that LGBTQ+ students/pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a student/pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as students/pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these students/pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these students/pupils and provide a safe space for them to speak out and share any concerns they have. At Bowden House School, all students have a mentor and a keyworker with whom they can share any concerns, etc.

Pupils questioning their gender

Where a pupil questions their gender or requests support relating to social transition, the DSL will lead a careful, individual assessment. The school will not initiate social transition. It will consider the pupil's welfare, the impact on other pupils, relevant professional advice and equality duties, and will involve parents or carers as a matter of priority unless doing so would increase safeguarding risk. Any decision, including arrangements for facilities and sport, will follow Keeping Children Safe in Education 2026 and be recorded and reviewed.

The school will maintain the single-sex toilets, changing rooms and residential accommodation required by Keeping Children Safe in Education 2026. Pupils will not use facilities designated for the opposite biological sex. Where needed, the DSL and school leaders will consider a suitable private alternative that protects the safety, comfort, privacy and dignity of everyone affected. Where a single-sex sport is required for safety, the school will follow the statutory guidance. Any individual arrangement will be documented and reviewed.

Students/pupils requiring mental health support

Bowden House and Bowden Primary are schools for students/pupils with Social, Emotional and Mental Health difficulties.

Staff recognise that mental health concerns can be a sign that a pupil has experienced, or is at risk of, abuse, neglect or exploitation. Staff will discuss concerns with the DSL and follow the school's Mental Health and Behaviour procedures.

15. Alternative Provision

The school will remain responsible for a student/pupil's welfare during their time at an alternative provider. When placing a student/pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. This situation is highly unlikely with both schools

Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

16.Work experience

When a student attends work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Work experience is difficult to secure for the students of Bowden House School but if this is possible, some students would be supported by a staff member in attendance. The school will also consider volunteering opportunities for students to gain experience of the world of work but the same principles of safeguarding will apply.

17.Concerns about students/pupils

If a member of staff has any concern about a student/pupil's welfare, they will act on them immediately by speaking to the DSLs or Deputy DSL(s). All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined on the Safeguarding Flowchart at the end of this policy and posted around the schools.

Where the DSL is not available to discuss the concern, staff members will contact the Deputy DSL(s) with the matter. If a referral is made about a student/pupil by anyone other than the DSL in the relevant school, they must be informed as soon as possible.

Both schools work closely with the Local Safeguarding Children Partnerships & LADO in East Sussex, the maintaining authority, (LBTH) and/or the placing LA who assist in deciding what action is required. The DSL monitors a referral if they do not receive information from the LSCP regarding what action is necessary for the student/pupil, the DSL will always act in the best interest of the student/pupil to ensure that their concerns have been addressed and that the situation improves for the student/pupil and that they are in a place of safety.

If early help is appropriate, the case will be kept under constant review. If the student/pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded on BehaviourWatch by the DSL or Deputy DSL.

If a student/pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a student/pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the student/pupil's wishes are always taken into account and that there are systems available for student/pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the student/pupil feels they are being listened to and believed.

An inter-agency assessment will be undertaken where a student/pupil and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the student/pupil and family require in preventing needs escalating to a point where intervention would be needed.

18.Managing referrals

The reporting and referral process is detailed on the Safeguarding Flowcharts for both schools.

All staff members, in particular the DSLs and the Deputy DSLs, are aware of the arrangements in place for managing referrals. They will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL, the Student & Family Co-ordinator, Bowden House and the SEMH Practitioner, at Bowden Primary will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students/pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings and to obtain help and support as necessary.

Where a student/pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other students/pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the student/pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as Early Help and therapeutic support.

At all stages of the reporting and referral process, the student/pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents/carers will only take place where this would not put the student/pupil or others at potential risk of harm. The school will work closely with parents/carers to ensure that the student/pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure that either school does not jeopardise any criminal proceedings and to obtain help and support as necessary.

19.Concerns about staff and safeguarding practices

Any concerns regarding the safeguarding practices at the school will be raised with the Leadership Team and the necessary whistleblowing procedures will be followed, as outlined in the school's Whistleblowing Policy. If a staff member feels unable to raise an issue with the Leadership Team, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

20.Safeguarding concerns and allegations of abuse against staff

All allegations against staff, will be managed in line with the LBTH Procedures for Managing Allegations of Abuse Against Staff Working in Children's, Schools and Family Settings – accessible to all staff on the One School (M): Whole School Policies site. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

This procedure includes concerns or allegations about trainee teachers, supply teachers, volunteers and contractors. Staff should report these promptly to the Headteacher; concerns about the Headteacher should go to the Chair of Governors, or to the LADO where there is a conflict of interest.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the above procedures document. Allegations that meet the harms threshold include instances where staff have:

- behaved in a way that has harmed a student/pupil or may have harmed a student/pupil
- committed or possibly committed a criminal offence against or related to a student/child
- behaved towards a student/pupil in a way that indicates they may pose a risk of harm to children

behaved or may have behaved, in a way that indicates they may not be suitable to work with children.

21.Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- in exchange for something the victim needs or wants
- for the financial advantage or other advantage of the perpetrator or facilitator
- through violence or the threat of violence

Specific forms of CCE can include:

- being forced or manipulated into transporting drugs or money through county lines
- working in cannabis factories
- shoplifting or pickpocketing
- committing vehicle crime
- committing or threatening to commit, serious violence to others.

The school recognises that student/pupils involved in CCE are victims themselves, regardless of whether they have committed crimes and even if the criminal activity appears consensual. The school also recognises that students/pupils of any gender are at risk of CCE.

School staff are aware of the indicators that a student/pupil is the victim of CCE, including:

- appearing with unexplained gifts, money or new possessions
- associating with other children involved in exploitation
- suffering from changes in emotional wellbeing
- misusing drugs or alcohol
- going missing for periods of time or regularly coming home late
- regularly missing school or education or not taking part.

County lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff are aware of the specific indicators that a student/pupil may be involved in county lines, including:

- going missing and subsequently being found in areas away from their home
- having been the victim or perpetrator of serious violence, e.g. knife crime
- receiving requests for drugs via a phone line
- moving drugs
- handing over and collecting money for drugs
- being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- being found in accommodation they have no connection with or a hotel room where there is drug activity
- owing a 'debt bond' to their exploiters
- having their bank account used to facilitate drug dealing.

Staff will be made aware of student/pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a student/pupil may be vulnerable to or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

22.Cyber-crime

For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- unauthorised access to computers, known as 'hacking'
- Denial of Service attacks, known as 'booting'
- making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring students/pupils to the National Crime Agency's Cyber Choices programme.

23.Child sexual exploitation (CSE)

For the purposes of this policy, **"child sexual exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- in exchange for something the victim needs or wants
- for the financial advantage, increased status or other advantage of the perpetrator or facilitator
- through violence or the threat of violence

The schools recognises that CSE can occur over time or be a one-off occurrence and may happen without the student/pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school recognises that CSE can affect any student/pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes students/pupils aged 16 and above who can legally consent to sexual activity. The schools also recognise that students/pupils may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a student/pupil is the victim of CSE, including:

- appearing with unexplained gifts, money or new possessions
- associating with other children involved in exploitation
- suffering from changes in emotional wellbeing
- misusing drugs or alcohol
- going missing for periods of time or regularly coming home late
- regularly missing school or education or not taking part
- having older boyfriends or girlfriends
- suffering from sexually transmitted infections.
- displaying sexual behaviours beyond expected sexual development

Where CSE or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

24.Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a student/pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

25.FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

The staff at both schools are alert to the possibility of a family member/neighbour or friend of one of the students/pupils being at risk of FGM or already having suffered FGM. If staff are worried such information shared with them about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The schools' procedures relating to managing cases of FGM and protecting students/pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by a student/pupil at Bowden House or Bowden Primary who may know of a possible victim of FGM under the age of 18. School staff failing to report such cases may face disciplinary action. Unless a member of staff has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators of FGM. While some individual indicators may not indicate risk, the presence of two or more indicators could signal a risk and information may be shared by one of the students of Bowden House School if they have sisters/relatives/neighbours who could be at risk. Staff should act in the event they are made aware or suspect FGM has or could be committed.

Indicators that a female under the age of 18 may be at heightened risk of undergoing FGM include:

- the socio-economic position of the family and their level of integration into UK society
- the female coming from a community known to adopt FGM
- any girl with a mother or sister who has been subjected to FGM

Indicators that FGM may take place soon include:

- when a female family elder is visiting from a country of origin
- a girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'
- known discussion about a girl, or her family member, going on a long holiday to her country of origin or another country where FGM is prevalent.

If staff in either schools become aware of the possibility of FGM having been undertaken or likely to happen, they should share this with the DSL immediately.

FGM is included in the definition of **"'honour-based' abuse (HBA)"**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such.

26. Forced marriage

Bowden House School only - for the purposes of this policy, a **"forced marriage"** is defined as a marriage that is 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 the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g., due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

All staff will be alert to the indicators that a student/pupil is at risk of, or has undergone, forced marriage, including but not limited to, the student/pupil:

- becoming anxious, depressed and emotionally withdrawn with low self-esteem
- showing signs of mental health disorders and behaviours such as self-harm or anorexia
- displaying a sudden decline in their educational performance, aspirations or motivation
- regularly being absent from school
- displaying a decline in punctuality
- an obvious family history of older siblings leaving education early and marrying early.

Staff who have any concerns regarding a student who may have undergone, is currently undergoing or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. Information on the above could be shared by the students.

27.Radicalisation

For the purposes of this policy, **"extremism"** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

Protecting students/pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of students/pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in students/pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify students/pupils who may be at risk of

radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents/carers and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the students/pupil's parents/carers, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Prevent Duty Policy.

28. Students/pupils with family members in prison

Students/pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

29. Students/pupils required to give evidence in court

Students/pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils at Bowden Primary School will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Students at Bowden House School will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

30. Mental health

All staff at Bowden House and Bowden Primary are aware that mental health problems can, in some cases, be an indicator that a student/pupil has suffered or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done in conjunction with the local GP and/ the school's Highly Specialist CAMHS Practitioner who is based at Bowden House who offers support to Bowden Primary and the

SEMH Practitioner. Staff are skilled in identifying students/pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff are aware of how students/pupils' experiences can impact on their mental health, behaviour and education.

Staff who have a mental health concern about a student/pupil that is also a safeguarding concern will act in line with this policy and speak to the DSLs or Deputy DSL(s).

The school will access a range of advice from the Highly Specialist CAMHS Practitioner to help them identify students/pupils in need of mental health support, including working with families/carers and external agencies.

Only an appropriately trained professional should diagnose a mental health condition. Staff will notice changes in mood, behaviour, attendance and presentation; raise concerns with the DSL; and seek immediate help from children's social care and/or the police if a child is at immediate risk.

31. Serious violence

Through training, all staff will be made aware of the indicators which may signal a student/pupil is at risk from or is involved with, serious violent crime. These indicators include but are not limited to:

- increased absence from school
- a change in friendships
- relationships with older individuals or groups
- a significant decline in academic performance
- signs of self-harm
- a significant change in wellbeing
- signs of assault
- unexplained injuries
- unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a student/pupil's vulnerability to becoming involved in serious violence. These risk factors include but are not limited to:

- being male
- having been frequently absent from school
- having been permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery.

Staff members who suspect a student/pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to their DSL.

Concerns about a pupil's involvement in serious violence will be recorded and shared promptly with the DSL. The DSL will assess immediate safety, consider support and referral to children's social care or police, and work with partner agencies.

32. Sharing nude and semi-nude images, including AI-generated images

Bowden House School and Bowden Primary School treat every incident involving the making or sharing of nude or semi-nude images or videos, including AI-generated images, as a safeguarding concern.

Safeguarding training will include child sexual development and understand the difference between sexual behaviour that is considered normal and expected for the age of the student/pupil and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sexting in the school community, including understanding motivations, assessing risks posed to students/pupils depicted in the images, and how and when to report instances of sexting.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that students/pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incident of sexting that involves indecent images of a student/pupil, they will refer this to the DSL as soon as possible. Where a student/pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- refrain from viewing, copy, printing, sharing, storing or saving the imagery
- tell the DSL immediately if they accidentally view an indecent image and seek support
- explain to the student/pupil that the incident will need to be reported
- respond positively to the student/pupil without blaming or shaming anyone involved and reassuring them that they can receive support from the DSL
- report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of students/pupils, including where there is an adult involved, where there is an intent to harm the student/pupil depicted or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of students/pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

For there to be a good and clear reason to view imagery, the DSL would need to be satisfied that this action is:

- the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts, e.g., the contents of the imagery, from the students/pupil(s) involved.
- necessary to report it to a website, app or suitable reporting agency to have the image taken down or to support the student/pupil or their parent in making a report

- unavoidable because the student/pupil has presented the image directly to a staff member or the image has been found on a school device or your school's network.

Where it is necessary to view the imagery, e.g., if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- never copy, print, share, store or save them as this is illegal – if this has already happened, contact the local police for advice and to explain the circumstances
- discuss the decision with the Headteacher/Head of School or a member of the SLT
- make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team (Student & Family Co-ordinator, Bowden House or the SEMH Practitioner, Bowden Primary) with delegated authority from the Headteacher or a member of the Leadership Team
- make sure viewing takes place with another member of staff present in the room, ideally the Headteacher/Head of School or a member of the SLT. This staff member does not need to view the images
- wherever possible, make sure viewing takes place on the school premises, ideally in the Headteacher/Head of School's office or a member of the SLT's office
- make sure, wherever possible, that they are viewed by a staff member of the same sex as the student/pupil in the images
- record how and why the decision was made to view the imagery on BehaviourWatch including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.

Where the incident is categorised as 'aggravated', the situation will be managed in line with the school's Child-on-child Abuse Policy. Where the incident is categorised as 'experimental', the students/pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL escalates the incident to CSCS. Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

33. Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents/carers. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the students/pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a student/pupil, staff members will not promise the student/pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects students/pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents/carers of the students/pupils involved. Discussions with parents/carers will not take place where they could potentially put a student/pupil at risk of harm. Discussion with the victim's parents/carers will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents/carers will have regards to the arrangements that will impact their child, such as moving classes or groups, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary. Therapeutic support will also be available to any student/pupil affected by any safeguarding concerns.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a student/pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the student/pupil's new provider, that will allow the new provider to support the student/pupil and arrange appropriate support for their arrival.

On transfer, the DSL will securely send the separate child protection file within the timescales stated under Roles and responsibilities, confirm receipt, and provide a clear summary of current concerns and support needs.

34. Safer Recruitment

The school's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An Enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- are responsible on a daily basis for the care or supervision of children
- regularly work in the school at times when children are on the premises
- regularly come into contact with children under 18 years of age.

Before a person, including a volunteer, works in regulated activity with children, the school will obtain the appropriate enhanced DBS check with children's barred list information in line with KCSIE 2026. Where applicable, the school will complete the separate barred list check and permitted risk assessment before the DBS certificate is received. An unchecked person must not undertake regulated activity.

From September 2026 the supervision exemption no longer removes an activity from the definition of regulated activity. The school will reassess affected volunteer roles and obtain the required checks before work in regulated activity begins.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The Governing Body will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK. At Bowden House and Bowden Primary, this will be included in the SCR check within the Standard 3 Inspection and reported to Governors. All short-listed candidates will be informed that their social media activity could be checked.

Safer recruitment arrangements will cover trainee teachers, volunteers, contractors and agency staff, including written confirmation of checks by the responsible organisation where appropriate. The separate Safer Recruitment Policy will set out the applicable checks and exceptions in detail.

The appropriate DBS and suitability checks are carried out for all Governors.

Staff suitability

This section applies to Bowden Primary School staff whose roles fall within the childcare disqualification requirements.

Bowden Primary School provides education and care for pupils under the age of eight. The SBM, Bowden House School, checks that staff in roles covered by the childcare disqualification requirements are not disqualified under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- have certain orders or other restrictions placed upon them
- have committed certain offences

The school will obtain suitability information from staff whose roles fall within the childcare disqualification requirements, in line with its safer recruitment procedures. A disqualified

person will not be permitted to continue in a covered role unless Ofsted grants a waiver. The school will provide support with this process.

Ongoing suitability

Following appointment, there will be regular DBS checks for all staff to ensure they remain safe to work with children and therefore prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The school will refer a person to the DBS when the legal referral criteria are met, including where the person has been removed from regulated activity because they harmed a child or pose a risk of harm, or would have been removed had they left. Redeployment out of regulated activity can amount to removal. Suspension pending investigation does not, by itself, trigger the duty to refer; the school will assess the criteria and may refer where appropriate.

35. Single Central Record (SCR)

The school keeps an SCR which records all staff who work at the school.

The following information is recorded on the SCR:

- an identity check
- a barred list check
- an Enhanced DBS check
- a prohibition from teaching check
- a check of professional qualifications, where required
- a check to determine the individual's right to work in the UK
- additional checks for those who have lived or worked outside of the UK

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

36. Use of the school premises for non-school activities

Bowden House School allows a local football team access to the football pitches, etc on Saturdays during the football season as students of the school are not on-site.

37. Training

All staff of Bowden House and Bowden Primary undertake Safeguarding Awareness training within the Induction Programme and further on-line safeguarding training within the first six weeks of their employment and thereafter annually.

The induction training will cover:

- the Safeguarding & the Protection of Children Policy
- the Child-on-child Abuse Policy and procedures

- the Staff Code of Conduct; Confidentiality Agreement; ICT Acceptable Use Agreement
- the Whistleblowing Policy
- Part one of 'Keeping Children Safe in Education' (KCSIE)
- details on Positive Handling training
- appropriate safeguarding and child protection training including on-line safety training – which amongst other things includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring
- information about the role and identity of the DSL and Deputy DSL(s).

All staff members will also receive regular safeguarding and child protection updates as required but at least annually following the publishing of KCSIE. Training will cover, at a minimum:

- the issues surrounding sexual violence and sexual harassment
- contextual safeguarding
- how to keep LAC safe
- updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSLs and Deputy DSL(s) will undergo child protection and safeguarding training and update this training at least every two years. The DSL and Deputy DSL(s) will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- the assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements
- how LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required
- the importance of providing information and support to CSCS
- the lasting impact that adversity and trauma can have
- to be alert to the specific needs of children in need, students/pupils with SEND and/or relevant health conditions and young carers
- the importance of internal and external information sharing
- the Prevent Duty
- the risks associated with online safety, including the additional risks faced online by students/pupils with SEND.

38. Monitoring and review

This policy is reviewed at least annually by the **DSL and the Headteacher**. The policy will also be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any **lessons learnt**.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

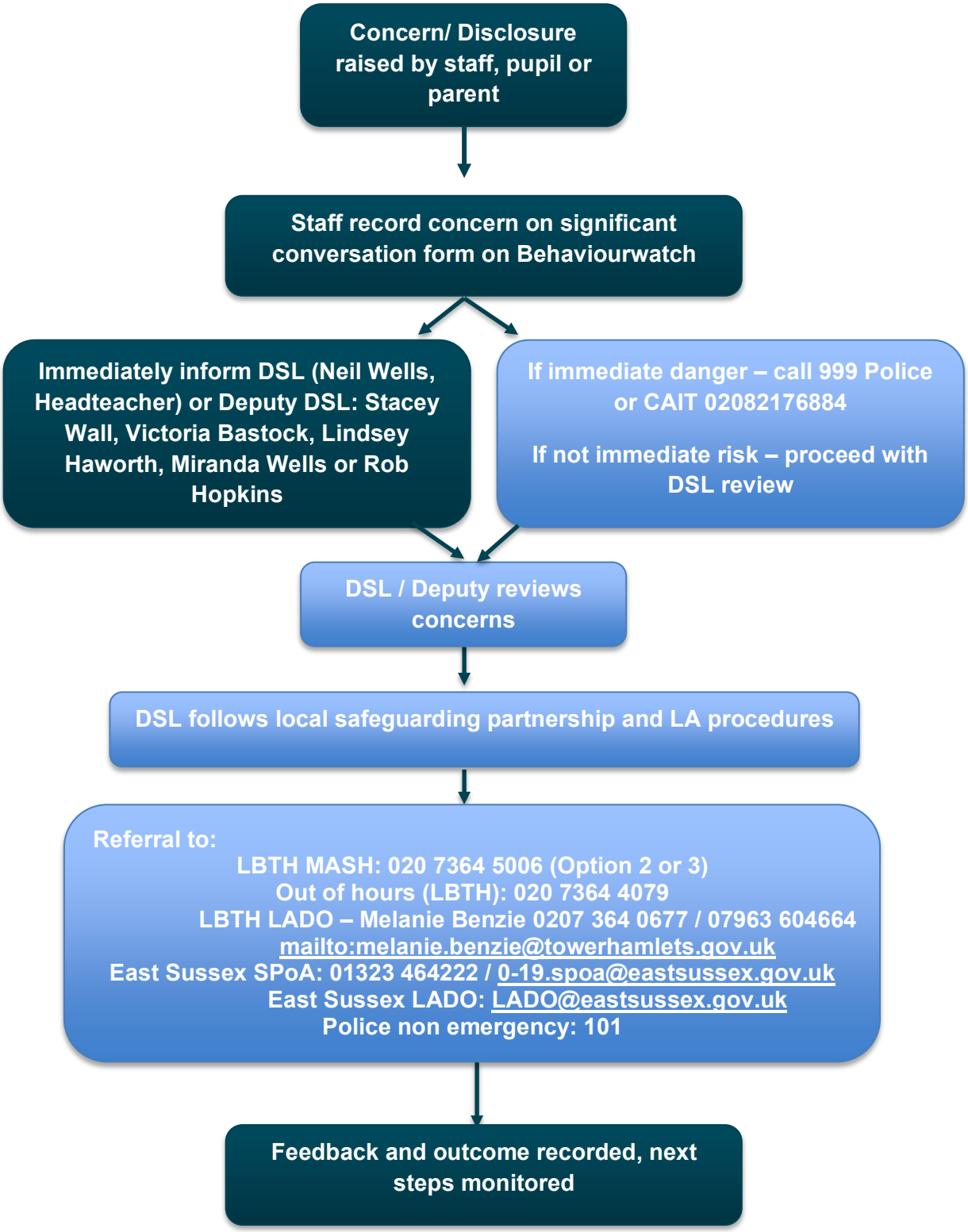
The next scheduled review date for this policy is Autumn Term 2027. This policy is to be read with reference to Keeping Children Safe in Education (KCSIE), 2026.

In addition:

- Following any **child protection incident**, the school will:
    - Review its safeguarding procedures.
    - Promptly report the findings to the Governing Body.
    - Involve the LADO in the review where an incident concerns a member of staff, to determine any improvements needed.
- If any **concerns are raised by the LADO or Ofsted** regarding safeguarding issues, the school will:
    - Ensure the DSL conducts an investigation as a priority and complies with any deadlines given.
    - Ensure the Chair of Governors reports to the LADO or Ofsted on the findings and sets out the actions to be taken.
    - Comply as soon as possible with any recommendations from the LADO or Ofsted.

Safeguarding & Protection of Children Flowcharts

Bowden House School



Bowden House Primary School

