

Each day, discovery.



ELTHAM COLLEGE

**7a Safeguarding Policy (including
Child Protection)**

Last reviewed: November 2025



Version Control Information

Reason For Amendment	Name	Date	Main changes
Annual Review	Designated Safeguarding Lead	August 2016	Streamlining of information. Revised to account changes to KCSIE September 2016. Formatting changes.
Annual Review	Ann Massey Designated Safeguarding Lead	August 2017	Formatting changes, addition of mechanisms to train staff, updating of contact details
Update	Ann Massey	February 2018	Removal of conditional tenses and paragraph references to KCSIE 2016 added
Annual review	Ann Massey	July 2018	Updated to reflect KCSIE 2018 and Working Together to Safeguard Children 2018
Annual review	Ann Massey	August 2019	Updated to reflect KCSIE 2019
Annual review	Ann Massey	July 2020	Updated to reflect KCSIE 2020
ISI advice	Ann Massey	April 2021	Updated to reflect KCSIE update Jan 2021 (Post EU Exit)
Annual review	Ann Massey	August 2021	Updated to reflect KCSIE 2021 and Sexual violence and sexual harassment between children in schools and colleges 2021
Update	Ann Massey	January 2022	Updated to reflect changes in personnel
Annual review	Ann Massey	August 2022	Updated to reflect KCSIE 2022
Update	Ann Massey	November 2022	Updated to reflect KCSIE paragraph insertion and subsequent change in numbering
Update	Ann Massey	July 2023	Updated to reflect KCSIE 2023
Update	Ann Massey	July 2024 October 2024	Updated to reflect KCSIE 2024 and Working Together to Safeguard Children 2023



		January 2025	Added an additional DDSL to the Junior School team Edited reference in section 7 to 2024
Annual Review	Melinda Pokorny	August 2025	Updated to reflect KCSIE 2025 Changes to safeguarding personnel in the Senior School
Update	Melinda Pokorny	November 2025	Addition of minor points of information and clarification on: Introduction, Private fostering, Attendance, CSE, Online safety, Concerns raised about a child, LADO contact details, Information sharing. Added: Links to SEND policy, domestic abuse act, operation encompass. Section on Private Fostering Section on out of school providers. Key duties of DSL
Update	Andrew Taylor	November 2025	Minor corrections to staff contact details
Update	Andrew Taylor	January 2026	Change of Safeguarding Governor

Other Related Documents

- Keeping children safe in education (KSCIE) (September 2025);
- Working together to safeguard children (December 2023)
- Working together to improve school attendance (August 2024)
- Online Bullying and Online Safety Policy;
- Staff Code of Conduct;
- Anti-Bullying Strategy.
- Recruitment Policy and Procedure
- Recruit teachers from overseas September 2020 (updated February 2021)
- Relationships and Sexual Health Education (RSHE) Policy
- Low Level Concerns Policy
- Modern Slavery Statutory Guidance



- Mental Health and behaviour in schools 2018
- Whistleblowing policy

1 Introduction

This policy has been drawn up in accordance with advice from and reference to Bromley Safeguarding Children Partnership (BSCP). It draws upon duties conferred by: Independent School Standards Regulations (ISSRs, 2014); Keeping Children Safe in Education (KCSIE, 2025 [Keeping children safe in education 2025](#)); Working Together to Safeguard Children (2023), Prevent Duty Guidance for England and Wales (2015, updated April 2021) and Safeguarding children and young people (Charity Commission Policy Paper 2014); Education and Training (Welfare of Children) Act 2021.

Safeguarding is defined as the action that is taken to promote the welfare of children under our care and enable the best outcomes. This includes:

- protecting children from maltreatment (including abuse, neglect and exploitation), inside or outside the home, including online
- preventing impairment of mental and physical health or development
- ensuring children grow in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes
- providing help and support to meet the needs of children as soon as problems emerge (KCSIE, Part 1).

Eltham College gives primacy to its safeguarding responsibilities and works to create an environment where students, parents and staff feel able to raise concerns and staff feel supported in their safeguarding role. We do this by promoting the welfare, health (including mental and emotional health) and safety of our students and operating a child-centred approach: all actions consider what is in the best interest of the child. This includes upholding processes which seek to ensure the suitability of our staff (as outlined in our safer recruitment policy), regular training for all staff, and clear protocols for action, as set out below.



2 Responsibilities

Senior School Designated Safeguarding Lead (DSL):

Melinda Pokorny (Assistant Head-Safeguarding) mmp@eltham-college.org.uk

Emergency Safeguarding Contact No: **07423554575**

Senior School Safeguarding Team:

Mr Sami Michael (Deputy Head Pastoral & DDSL) sfm@eltham-college.org.uk

Mrs Nicola Bilsby (Assistant Head- Wellbeing and EDI & DDSL) njb@eltham-college.org.uk

Mrs Corisande Scott-Blount (Asst Head-Head of Sixth Form & DDSL) csb@eltham-college.org.uk

Mrs Lucy Clough-James (Asst Head-Head of Middle School & DDSL) lvc@eltham-college.org.uk

Mr James Chesterton (Asst Head-Head of Lower School & DDSL) jpc@eltham-college.org.uk

Junior School Designated Safeguarding Lead: Mr Andrew Taylor (Deputy Head) ant@eltham-college.org.uk

Emergency Safeguarding Contact No: **07738280750**

Junior School Deputy Designated Safeguarding Leads: Mrs Nicki Chamberlain (Head of Years 3&4) nxc@eltham-college.org.uk;

Mr Iain Wearmouth (Head of Year 5&6) icw@eltham-college.org.uk

Eltham College Governor with responsibility for safeguarding: Tim Meunier (tmgov@eltham-college.org.uk)

Safeguarding and promoting the welfare of children is everyone's responsibility. The school trains all staff, regardless of their role, to be vigilant and watchful for, and aware of the signs of abuse and neglect. Staff are alert to changes in children's behaviour and will always speak to the DSL or Deputy DSL immediately if they have any safeguarding concerns about a student. Staff maintain an attitude of 'it could happen here'. The DSL or deputy can always be contacted in person, by phone or email as detailed above. Staff will not assume that someone else has reported the concern and will share information that might be critical in keeping children safe. All staff have a right to refer their concerns to social services or the police as outlined in this policy and in KCSIE 2025. The DSL or DDSL is likely to have a complete



safeguarding picture and be the most appropriate person to advise on safeguarding concerns. In the very exceptional case that a DSL or DDSL is not available, this would not delay appropriate action being taken and staff would speak to a member of the senior leadership team and/or take advice from children's social care (KCSIE 2025).

All staff are expected to abide by the School's Code of Conduct and maintain public trust in the teaching profession (Teachers' Standards, 2011 updated July 2021). Staff understand the systems which support safeguarding as detailed in this policy, the Behaviour Policy, the staff code of conduct, the response to children who go missing from education and the role of the DSL

The DSL is the first point of contact for external agencies pursuing Child Protection investigations and she co-ordinates the School's representation at conferences and Team Around the Child/Family (TAC/TAF) meetings. Where referrals are not made by the DSL, the DSL will be informed of the referral as soon as possible.

Eltham College's Governor with responsibility for safeguarding is Tim Meunier. He can be contacted via email: tmgov@eltham-college.org.uk.

Jim Gamble is the Independent Chairperson of the Bromley Safeguarding Children Partnership (BSCP). The BSCP can be contacted on 020 8461 7816. The three safeguarding partners are:

- Metropolitan Police (South BCU), represented by the Borough commander
- Bromley Clinical Commissioning Group, represented by the Managing Director
- Bromley Council (Children's Services), represented by the Director of Children's Social Care

Bromley Children and Families Hub can be contacted on 020 8461 7373/ 7379 or by email candfhub@bromley.gov.uk during office hours. The 'out of hours' emergency contact number for Bromley is **0300 303 8671**.

Senior Local Authority Education Welfare Officers are Sophia Obee and Kim Brown. They can be contacted as follows:

Sophia Email: sophia.obee@bromley.gov.uk

Sophie Phone: 020 8461 7272

Kim Email: kim.brown@bromley.gov.uk

Kim Phone: 020 8313 4159

The Bromley Threshold of Need guidance is linked here: [ThresholdsOfNeed2021-11_Part01](#)

3 Recognising signs and forms of abuse, neglect and exploitation

Abuse is a form of maltreatment of a child (KCSIE 2025, part 1, paragraph 24) by inflicting harm or failing to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. Abuse includes serious physical and sexual assaults, as well as cases where the standard of care does not adequately support the child's health or development. Abuse can take place wholly online or technology can be used to facilitate offline abuse. Abuse, neglect or exploitation can occur in a family or an institutional or community setting. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others. Children can be abused by an adult or adults or by another child or children.

Staff are aware that abuse, neglect and exploitation are rarely stand-alone events that can be covered by one definition or label. All staff understand that they have a responsibility to provide a safe environment



in which children can learn and maintain an attitude of ‘it could happen here’. **Staff will always act in the best interests of the child.**

Staff understand the importance of **contextual safeguarding**. They are alert to the fact that safeguarding incidents or behaviours can be associated with factors outside of school and consider whether children are at risk of familial abuse. The Domestic Abuse Act 2021 [Domestic Abuse Act 2021](#) recognises child as victims of domestic abuse in their own right if they see, hear or experience domestic abuse and its effects. Staff also understand that children can be at risk of abuse or exploitation in situations outside their families. Staff are aware that children can be vulnerable to multiple harms, including but not limited to sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse) criminal exploitation, serious youth violence county lines and radicalisation.

Working Together to Safeguard Children (2023) and KCSIE (2025) set out definitions and examples of the four broad categories of abuse. All staff are trained to recognise the forms and signs of abuse. These include:

Type of abuse	Risk indicators
<p>Physical abuse</p> <p>Physical abuse, as defined in KCSIE, 2025, Part 1, paragraph 25 may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness in a child.</p>	<p>NB these are not proof that abuse has taken place, but are potential signs of abuse</p> <ul style="list-style-type: none">• Bruising that cannot be accounted for by participated in games, play or as a result of a child’s normal activity;• Finger/teeth marks;• Burns and scalds with clear outlines, or of uniform depth over a large area, small round burns or splash marks above a main scald;• Spiral, chip or rib fractures or multiple fractures;• Multiple injuries;• Aggression;• Usual behaviour, obsessive;• Jumpy, easily startled;• Regularly saying they feel unwell;• Vague or changing explanations for injuries; accounts that are not compatible with the injury;• Delay in seeking treatment or failure to attend medical appointments.



Emotional abuse

Emotional abuse, as defined in KCSIE, 2025 Part 1, paragraph 26, is the persistent emotional ill treatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Imposing developmentally inappropriate expectations;
- Causing children to feel frightened or in danger - e.g. witnessing domestic violence;
- Exploitation or corruption of children.
- Some level of emotional abuse is involved in most types of ill treatment of children, though emotional abuse may occur alone.

- Development delay, either physically, emotionally or intellectually;
- Over-acting to mistakes;
- Sudden speech disorder;
- Fear of new situations;
- Lack of concentration;
- Wild imagination;
- Inappropriate emotional responses to stressful situations;
- Extremes of passivity or aggression;
- Drug or alcohol or solvent abuse;
- Eating disorders/self-harm;
- Compulsive stealing;
- Fear of parents being contacted;
- Suicidal thoughts;
- Stomach/headache;
- Seeking attention;
- Bullying;
- Truancy;
- Blaming themselves for family problems;
- Loner/withdrawn;
- No affection;
- Inability to form relationships or avoiding doing things with other children;
- Depression or anxiety;
- Disparity between attainment and inability;
- Behaving much younger than their age or behaving like an adult;
- Believing they are bad, evil or possessed.



Sexual abuse

Sexual abuse, as defined in KCSIE, 2025, Part 1, paragraph 27 involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. This includes penetrative (for example rape or oral sex) and non-penetrative acts (such as masturbation, kissing or rubbing) It may also include non-contact activities, such as involving children in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.

- Sexually precocious behaviour or promiscuity;
- Sexualised drawings, writing, play;
- Sudden poor performance at school or regression;
- Poor concentration;
- Use of drugs and/alcohol;
- Poor self-esteem. Self-image;
- Stomach/headache;
- Suicidal or self-harm;
- Confusion of affection with sexual behaviour;
- Sexual abuse/sexual bullying of other children;
- Eating disorders or sleep disturbance;
- Being withdrawn or depressed;
- Fear of new situations;
- Unexplained sums of money or gifts;
- Associating with unknown adults or other sexually exploited children;
- Reduction in interaction with family and friends;
- Older boyfriend/girlfriend;
- Using sexual language that is beyond expected knowledge for age;
- Obsessed with sexual matters;
- Fearful of undressing;
- Failure to attend school;
- Going missing from home or regularly coming home late.



<p>Neglect</p> <p>Neglect, as defined in KCSIE, 2025, Part 1 paragraph 28 involves the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health and development.</p> <p>This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child’s basic emotional needs.</p>	<ul style="list-style-type: none">• Hunger/tired/underweight and small for chronological age;• Delays in language and communication;• Cold, mottled skin;• Dirty/smelly/unkept/dry sparse hair;• Inappropriate footwear/clothes;• Swollen limbs with sores which are slow to heal;• Untreated medical problems;• Stealing, scrounging or scavenging – food, money, clothing;• Diarrhoea caused by tension, poor diet, poor hygiene;• Unresponsive relationships with adults;• Lack of parental involvement;• Maintaining a frozen position for unnaturally long time;• Destructive tendencies;• Late to school/ attendance issues;• Depressed/ anxious /low self-esteem;• Attention seeking/withdrawn;• No peer relationship/ lonely;• Running away.
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The School recognises that it plays a significant part in the prevention of harm by providing students with clear lines of communication with trusted adults. To this end details of individuals that students and staff can contact are signposted across the school and an anonymous online reporting system, Whisper and a Suggestions Box are available to staff and students. All staff recognise that children may not feel ready or know how to tell someone they are being abused. Staff maintain a professional curiosity and share any concerns with the DSL, either in person, by telephone or via CPOMS. The School also has due regard to other safeguarding risks, in particular:

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Staff are aware that this can be committed by parents and family members, by people known but not related to the victim and by strangers.

Community safety incidents in the vicinity of the school can raise concerns amongst parents and children, for example people loitering nearby. Students are given practical advice about how to keep safe and this is repeated at regular intervals.

Children and the court system or with family members in prison

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The DSL will work with the HM Courts and Tribunal Service to ensure support is in place for children in the court system. Families may need to make arrangements via the family courts for custody rights following separation. Staff are aware of the stress that these circumstances can generate for children and appropriate support is offered.



200,000 children in England and Wales have a parent sent to prison each year. Staff are aware that these children are at risk of poor outcomes and support is put into place to mitigate the effect of this.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (KCSIE Para 340-343).

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Children with SEN or Disabilities

Additional barriers can exist when recognising abuse and neglect in this group of children. This can include: (a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; (b) children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and (c) communication barriers and difficulties in overcoming these. Staff are aware that children with SEND are more prone to peer group isolation and the pastoral structure provides additional support for individuals as necessary. Eltham College's Learning Support Policy can be found here [Learning Support Policy .pdf](#).

Children who are absent/missing from education (CME)

A child who is absent from education, particularly repeatedly, is a potential indicator of safeguarding concerns. These may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation or involvement in county lines and/ or gangs. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or forced marriage. Early intervention is a priority to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.



Staff will alert the school office team and the pastoral team if a child is missing. The Deputy Head, Head of Section and Head of Year will be alerted. In the absence of these individuals, the school nurse will be alerted and school procedures will be followed. All students are added to the admissions register on the entry into the school and registered at least twice daily (8:35am and 2:05pm). We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when students are not in school. The Admissions office will notify the relevant local authority of any student (of the compulsory school age) who leaves the school.

The school's Attendance Policy should be referenced for any CME concerns.

The DSL will work with the local authority where school absences indicate a safeguarding concern (Working together to improve school attendance, 2024 [Working together to improve school attendance - GOV.UK](#), KCSIE 2025).

Child Sexual Exploitation

Staff are aware that Child Sexual Exploitation and Child Criminal Exploitation both occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (KCSIE 2025). Staff are alert to the key indicators of children being sexually exploited. These can include:

- Going missing for periods of time or regularly coming home late;
- Regularly missing school or education or not taking part in education;
- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Having an older boyfriend/girlfriend;
- Suffering from sexually transmitted infections;
- Mood swings or changes in emotional wellbeing;
- Drug and alcohol misuse; and
- Displaying inappropriate sexualised behaviour.

Staff are aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such and that there may be underlying vulnerabilities that increase the risk of CSE.

Child Criminal Exploitation, County Lines and Modern Slavery

Staff are aware that county lines is a geographically widespread form of harm whereby drug networks and gangs exploit young people to carry drugs and money from urban to suburban and rural areas, market towns and seaside resorts. This can happen locally as well as across the UK. This can affect all types of children, can be exploitation even if it appears to be consensual and is typified by a power imbalance. Staff are aware that the experience of girls who are criminally exploited can be very different to that of boys. Both boys and girls who are criminally exploited may be at higher risk of sexual exploitation. Staff are alert to the fact that children are increasingly being targeted and recruited into county lines through social media and that the signs of involvement in county lines are similar to those of other forms of abuse. Any possible CCE case will be shared with the DSL or DDSs with a view to referring to appropriate agencies following the referral procedures. See KCSIE (2025) pages 151 and 152 which includes relevant indicators of harm.



Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Any possible case of Modern Slavery will be reported to the DSL or DDSs who will follow the procedures outlined in [Modern Slavery: Statutory Guidance for England and Wales](#) for referral to the National Referral Mechanism.

Domestic abuse and homelessness

The Domestic Abuse Act 2021 introduced the first definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse (<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>) Staff are aware that exposure to domestic abuse can have a serious and long lasting emotional and psychological impact upon children. The School participates in Operation Encompass ([Home : Operation Encompass](#)) and the DSL takes appropriate steps to support young people who have been victims of domestic abuse. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is referred to as teenage relationship abuse. Any concerns that staff have about domestic abuse are reported to the DSL or DDSs who will have a full safeguarding picture and refer to children's social care as appropriate. Domestic abuse can be an indicator that a child is at risk of homelessness. The DSL and DDSs are alert to the risks that homelessness presents to a child and external support from Local Authority Housing and children's social care are simultaneously sought where appropriate.

Mental Health

The school actively supports and promotes positive mental health. Its approach comprises of:

Prevention: creating an environment that is safe and calm and a culture in which positive mental health is valued. Students are taught resilience to help them manage the stress of life effectively. Parents are supported to ensure that their actions contribute positively to this.

Identification: staff and students are made aware of the signs that mental health can be deteriorating and are encouraged to speak openly about this and know where to seek support. Staff and students understand the importance of identifying problems early. Staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are aware that adverse childhood experiences can affect behaviour and are trained to be alert to the signs of this and share their concerns. They understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence, and adulthood.

Staff understand that only an appropriately trained professional should attempt to make a diagnosis of a mental health problem, but they are well placed to observe children day to day and identify those children whose behaviour suggests that they might be experiencing or developing a mental health problem. If staff have a concern about a child's mental health that is also a safeguarding concern, they will speak immediately with the DSL or DDSs (KCSIE 2025, paragraph 45) and appropriate action will be taken by the DSL or DDSs. All other mental health concerns are logged onto CPOMS and closely monitored by the pastoral teams.

Early help: when mental health problems are identified, students are supporting in accessing appropriate interventions, including support from specialists at school. Students can contact the school counsellor directly by email or during the lunchtime drop in at the Foxbury Centre. The impact of these interventions



are closely monitored by the pastoral and safeguarding teams. Where a mental health problem could be considered to amount to a disability, the DSL or DDSLs will ensure that reasonable adjustments are made that meet the individual's needs. The DSL and DDSLs work closely with specialists to ensure that cases are escalated externally where appropriate.

Access to external specialist support: referring to and working effectively with external agencies to provide swift access to specialist treatment and monitoring the impact of interventions.

Female Genital Mutilation (FGM) and Honour Based Violence

Information and advice can be found at: <http://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

FGM is illegal in the UK and is a form of violence against women and girls. Staff are alert to the possibility of a girl or woman being at risk of FGM, or having already undergone FGM. There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. There is a ***mandatory reporting duty for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out on a girl under 18.***

Forced marriage is illegal and will be reported to the police.

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. All forms of HBV are /abuse and will be handled and escalated as such.

If staff have a concern they will (in discussion with the DSL) instigate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. More detail can be found in the document Mandatory Reporting of Female Genital Mutilation – procedural information:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

Child-on-child abuse

The School has a strong commitment to its Anti-bullying (Child-on-child abuse) Strategy and will consider all coercive acts and child-on-child abuse from a safeguarding perspective. All staff are alert to the risk of child-on-child abuse (including online) and understand their role in preventing, identifying and responding to it. It can take many forms including, but not limited to:

- Bullying
- Physical abuse
- Verbal abuse
- Online bullying, including the sending of nudes (youth produced sexual images, including AI generative material)
- Relationship abuse, including domestic abuse and abuse in intimate personal relationships between peers
- Sexual violence
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand alone or may be part of a broader pattern of abuse



- Upskirting (taking a picture under a person's clothing without their knowledge with the intention of viewing their genitals or buttocks to obtain sexual gratification, causing the victim humiliation, distress or alarm)
- Child sexual exploitation
- Initiation/ hazing type violence and rituals

All child-on-child abuse is unacceptable and is taken seriously and all staff dealing with incidents of child on child abuse are mindful of the School's Anti-bullying Strategy and KCSIE 2025 paragraph 157. We do not tolerate this or pass it off as 'banter', 'just having a laugh' or 'part of growing up'. All staff are aware that even if there are no reports of child on child abuse it does not mean it is not happening. All behaviour incidents are logged centrally onto CPOMS. This can help to identify behavioural trends that may be emerging across a cohort of students, at a particular time of day or location, including online. The DSL is alerted to all reports of or concerns about child-on-child abuse. In the event of a disclosure about child-on-child abuse, all children involved, whether perpetrator or victim, are treated as being 'at risk'. Clear reporting systems are in place for students to report child-on-child abuse, including an anonymous, online reporting system, Whisper, a Suggestions Box and signposting to a range of adults that students can talk to. Students are regularly reminded about these reporting systems.

Allegations of child-on-child abuse will be investigated in accordance with the Anti-bullying (child-on-child abuse) strategy. CPOMS is used to record actions and outcomes. The DSL closely monitors this. Staff are aware that child-on-child abuse is often gendered with girls more likely to be the victims and boys more likely to be the perpetrators, but all genders are affected. Students with SEND are more prone to peer group isolation than other children and staff are vigilant for this and offer support accordingly. Such abuse rarely operates in isolation and can be indicators of other safeguarding issues. All incidents of child-on-child abuse will be dealt with in a safeguarding context. Where there is cause to suspect that a child is suffering, or is likely to suffer, significant harm, a bullying incident will be addressed as a child protection concern under the Children Act 1989 [The Children Act 1989 guidance and regulations](#). The DSL or DDSL will have the full safeguarding picture and will take the necessary steps to refer to children's social services and other external agencies, if appropriate.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school's behaviour policy. As a school, we will minimise the risk of allegations against other students by providing a developmentally appropriate Well-being curriculum and through other forums in school such as chapel, whole school, section and house assemblies. The curriculum and these additional mechanisms develop students' understanding of acceptable behaviour and keeping themselves safe (including online). Clear systems are in place for all students to raise concerns with staff, knowing that they will be listened to, believed and valued. Staff engage in targeted work and support for students identified as being a potential risk to other students.

We will always ascertain the views and feelings of all children and adopt a victim led approach where possible. We acknowledge that children who are affected by abuse or neglect may demonstrate their distress through their words, actions, behaviour, demeanour, school work or other children. In all cases, we have a responsibility to ensure that we support children who are bullied and make appropriate provision for their needs. The nature and level of support will depend on the individual circumstances and the level of need. These can include a quiet word from a teacher who knows the child well, asking the pastoral team to provide support, providing formal counselling, engaging with parents, referring to local authority children's services, completing a CAF (common assessment framework) or referring to Child and Adolescent Mental Health (CAMHS) services or the school counsellor. It is also important to consider the motivations behind bullying behaviour and whether it reveals any concerns for the safety of



the perpetrator. When this is the case, the children engaging in bullying may need support themselves. Low-level disruption and the use of offensive language can have a significant impact on its target. Early intervention can help to set clear expectations of the behaviour that is and is not acceptable and help stop negative behaviours escalating. This is also true of the use of language which is detrimental to groups such as those with SEND, race, religion, disability, nationality or LGBTQ+.

Bullying which occurs outside the school premises

School staff members have the power to discipline students for misbehaving outside the school premises. Sections 90 and 91 of the Education and Inspections Act 2006 [DEPARTMENT FOR EDUCATION ADVICE:](#) state that a school's disciplinary powers can be used to address pupils' conduct when they are not on school premises and are not under the lawful control or charge of a member of school staff, but only if it would be reasonable for the school to regulate students' behaviour in those circumstances. This may include bullying incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre. Where bullying outside school is reported to school staff, it will be investigated and acted on. The Head will also consider whether it is appropriate to notify the police or the Bromley Safer Schools Officer of the action taken against a student. If the misbehaviour could be criminal or poses a serious threat to a member of the public, the police will always be informed. While school staff members have the power to discipline students for bullying that occurs outside school, they can only impose the disciplinary sanction and implement that sanction on the school premises or when the pupil is under the lawful control of school staff, for instance on a school trip. However, our main aim is not to start our response to bullying at the point at which a child has been bullied. We endeavour to address issues between students which may provoke conflict in the first instance as detailed above and, through involving the entire school community including parents with whom we communicate about such issues through parent seminars and online and regular updates. Our Prefects and Anti-bullying ambassadors are also trained in recognising the signs of safeguarding issues, including recognising the signs of bullying, and know to pass on any concerns to senior staff. They are a great source of support and early intervention.

Child on child sexual violence and sexual harassment

All staff understand the importance of adopting an attitude of 'it could happen here' and especially so when considering child-on-child abuse and child-on-child sexual violence and sexual harassment.

Sexual harassment defined as 'unwanted conduct of a sexual nature' (KCSIE, 2025, paragraph 456). It is likely to violate a child's dignity, make them feel degraded or humiliated. It can include behaviours such as telling sexual stories, making lewd comments or sexual remarks, or physical acts such as bra strap pulling, lifting up skirts, grabbing bottoms, genitalia or breasts. (When interpreting whether this behaviour crosses the line into sexual violence, the DSL will consider the experience of the victim). Sexual harassment can also take place online and may include the non-consensual sharing of sexual images and videos, AI generated material, unwanted sexual comments and messages and sexual coercion and threats.

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 [Guidance on part 2 of the Sexual Offences Act 2003 \(accessible version\) - GOV.UK](#) and includes rape, assault by penetration and sexual assault as detailed in KCSIE 2025, paragraph 455. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16. Sexual intercourse without consent is rape.

Children's sexual behaviour exists on a wide continuum. Addressing harmful sexual behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Harmful sexual behaviour can occur online and/or face to face and can also occur simultaneously between the two. Harmful sexual behaviour is considered in a child protection context. A range of



reporting mechanisms are available for students to report their concerns about harmful sexual behaviour, including anonymous online reporting and clear signposting to a range of individuals who can offer support. However, staff recognise that the absence of reported concerns does not mean that harmful sexual behaviour is not happening and are always vigilant for indicators of this.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Any report of sexual violence or harassment will be taken seriously. Victims will be reassured that this is the case and that they will be supported and kept safe. Staff maintain an attitude of 'it could happen here' and all concerns, including those outside of school are responded to. Staff are aware that it is more likely that girls will be the victims of sexual harassment and violence and boys will be the perpetrators. In the event of a report of sexual violence or harassment (online or offline), all victims are reassured that they are being taken seriously, that they are being supported and kept safe. No promise of confidentiality will be made. The person to whom the child discloses will recognise that the child has placed them in a position of trust and will listen carefully in a non-judgemental fashion, reflect back and use the child's language, will be clear about boundaries, will not ask leading questions and explain that they will pass this information onto the DSL. A written account of the disclosure will be recorded on CPOMS. This will record the facts as the child presents them. The DSL will make an immediate risk assessment, considering how best to support and protect the victim and the alleged perpetrator and all other children, and respond according to the steps outlined in Part 5 KCSIE 2025.

Risk assessments will be recorded and kept under review on a case-by-case basis and the DSL will consider:

- Where possible, the wishes of the victim in terms of how they want to proceed
- The nature of the alleged incident
- The ages of the children involved
- The development stages of the children involved
- Any power imbalance between the children
- Is the incident a one-off, or a sustained pattern of abuse
- Are there ongoing risks to the victim, other children, school or college staff
- Contextual safeguarding issues

In line with KCSIE 2025, reports will be

1. Managed internally
2. Managed with Early Help
3. Referred to children's social care
4. Reported to the police in parallel to children's social care

The DSL will take responsibility to ensure that the ongoing response to the victim and the alleged perpetrator will be in accordance with KCSIE 2025. Immediate consideration will be given as to how best to support and protect the victim and alleged perpetrator(s) (and any other children involved or impacted). In the event of a report of rape or assault by penetration, whilst the DSL is liaising with the police and social care, the alleged perpetrator(s) will be removed from any classes they share with the victim and consideration will be given as to how they can be kept apart on the premises and on transport to and from school if applicable. These actions are in the best interests of all involved and will not be perceived to be a judgement on the guilt of the alleged perpetrators. For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator will be considered by the DSL



whose actions will be determined on a case-by-case basis, considering the wishes of the victim, the nature of the allegations and the protection of all children in the school. It may be appropriate to take disciplinary action against the alleged perpetrator(s) alongside providing appropriate support. The disciplinary response will be proportionate and decided on a case-by-case basis in consultation with the Headmaster and in accordance with KCSIE 2025. Students can be signposted to the Lucy Faithfull Foundation, a confidential service for young people worried about sexual thoughts or behaviour [Home - Shore](#).

Online safety and sharing of nudes (consensual and non-consensual)

Children are at risk of abuse online and can also abuse their peers online. Staff understand that for children there is no separation between their online and offline life. All staff are aware of the breadth of risks posed by technology for student safeguarding and wellbeing.

The four key categories of risk are as follows:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

The School adopts a holistic approach to educating students and train staff about the potential dangers of the internet and balancing this with the benefits it can offer. Appropriate filtering and monitoring of behaviours is used to limit childrens' exposure to the four key categories of online harms and there is a clear policy regarding the use of mobile phones. The DSL has lead responsibility for Filtering and Monitoring Standards and works closely with the Director of IT to ensure best practice. We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures. Regular reviewing of our filtering and monitoring procedures take place to ensure that they are effective in preventing access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All Staff undertake annual cybersecurity training, as well as training to understand the risks of poor filtering and monitoring, and know how to share their concerns.

Other relevant policies include the Behaviour Policy, the Anti-Bullying (child-on-child abuse) Policy and Online Safety Policy.

Clear procedures are in place for dealing with cases of sharing nudes and students are taught that this is unacceptable, illegal (and when non-consensual abusive) through forums such as form time discussions, the Wellbeing programme and assemblies. Advice from the UKCCIS in responding to the sharing of nudes is followed [Overview of Sexting Guidance.pdf](#).



Generative Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative AI tools. Eltham College recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real. Staff are aware of the increase in this behaviour among children. We treat any use of AI to access harmful content or to harm others in line with this policy and our anti-bullying and behaviour policies.

The sharing of AI-generated indecent images will be dealt with in line with our procedures relating to an indecent image of any sort.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

Other relevant policies include the Behaviour Policy, the Anti-Bullying (child-on-child abuse) Policy and Online Safety Policy.

Cybercrime is criminal activity using computers and/or the internet. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cybercrime. If there are concerns about this, the DSL will consider a referral into the Cyber Choices programme.

The Prevent Duty

'Radicalisation' refers to the process by which a person comes to support terrorism and forms of extremism.

'Extremism' is defined as vocal or active opposition of fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremist, calls for the death of members of our armed forces, whether in this country or overseas.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

All staff are trained to understand their duty under Prevent to be aware of the risk of children being drawn into terrorism, and to challenge extremist ideas. Staff are trained to recognise early indicators and are watchful for any student showing signs of radicalisation or extremism including:

- Changes in behaviour;
- Possessions of extremist material;
- Expression of extremist views;
- Unhealthy level of fixation or obsession with religious or political views/issues;
- Socialising with people known to have extremist views.

Staff who notice these signs or have any related concerns will inform the DSL. This is in keeping with professional responsibility for the child's welfare and legal requirements set out in the Counter-Terrorism & Security Act 2015 [Counter-Terrorism and Security Act - GOV.UK](https://www.gov.uk/government/legislation/counter-terrorism-and-security-act-2015). The Designated Safeguarding Lead will share concerns with the local Prevent team, who will support the school, either by escalating the matter



or providing guidance. This may include making a referral to the Channel programme, where the student's engagement is entirely voluntary at all stages.

When accessing the internet at school appropriate filters are in place to keep children safe from terrorist and extremist material. The School actively promotes British values through its Well-being programme, form time discussions and assemblies.

The DfE has a dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and email counter.extremism@education.gov.uk

4 Procedure for Staff Dealing with Concerns about Children

All staff are alert to identifying children who would benefit from **early help**. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can also prevent further problems arising, for example, if it is provided as part of a support plan where a child has returned home to their family from care.

Any child may benefit from early help. All staff are particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is frequently missing/goes missing from care or home
- is misusing drugs or alcohol
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care

5 Action if concern is raised about a child

If a member of staff has any concerns about a child s/he will discuss these with the DSL or a Deputy DSL immediately. The DSL or a Deputy will always be available and staff can use the mobile phone numbers provided if the DSL is not physically on site. The DSL (or Deputy if appropriate) will ask the member of staff to provide a written account via CPOMS. The DSL/ DDSL will decide on the relevant course of action, in consultation with the relevant MASH team if applicable.

If it is considered appropriate to offer early help to the child and his/her family, or if the child is considered to be a Child in Need, the School will work in conjunction with Bromley Children's Project (or local borough alternative) to support the child and family, including contributing to a CAF assessment, enabling access to the school counsellor and any other reasonable supportive measure. A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

The actions taken by the DSL and any discussions undertaken at each step of this process will be recorded. The situation will be kept under close review as it is recognised that a child's needs are not static.

At Eltham College we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as



facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

6 Action if the child is a child in need, who has suffered, or is at risk of significant harm, or a child who is in immediate danger

If a child is considered to be in immediate danger or is at risk of harm, this is a matter of child protection (section 47, Children Act 1989). The member of staff who identifies this risk should report it to the DSL and the DSL will make a referral to Children's Social Care and/ or the police within 24 hours.

There is a duty on all staff to persist with referrals directly to children's social care if they feel that appropriate action is not being taken. However, all staff are expected to raise concerns with the DSL in the first instance and inform her if they make a referral directly. If confronted with a possible case of abuse that a child has chosen to disclose to a member of staff, all staff will listen and be supportive. They will refrain from asking leading questions and will write up the details of the disclosure verbatim as far as possible. These notes are signed and dated and given to the DSL. All staff are issued with a credit card sized reminder of what to do if a child discloses information to them (see Appendix B).

There is no requirement for parental consent for a referral to the local Safeguarding Partnership if a child is considered to be at risk of significant harm.

7 Procedure for dealing with concerns or allegations against adults

All staff are required to be vigilant and communicate any concerns they have about any adult's suitability to work with children.

When handling allegations, the School will always follow Part 4 of KCSIE 2025 and guidance from the local Safeguarding Partnership. There are two levels of allegation/concern:

1. Allegations that may meet the harms threshold
2. Allegations/concerns that do not meet the harms threshold (low level concerns).

When an allegation is made, in accordance with KCSIE 2025, paragraph 364, two aspects will be considered:

1. Looking after the welfare of the child
2. Investigating and supporting the person subject to the allegation

Allegations that may meet the harms threshold

Responsibility for appropriate action lies with the Headmaster. This procedure would be used in all cases in which it is alleged that a teacher or supply teacher, other member of staff or volunteer, or contractor has:

- Behaved in a way that has harmed a child or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and / or;
- Behaved towards a child or children in a way that indicates s/he may pose a risk of harm to children; and /or.
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children (KCSIE 2025, paragraph 359)



Behaviour that may have happened outside of school that might make an individual unsuitable to work with children is known as a transferable risk.

If an allegation is made against **a member of staff, or a volunteer**, the matter will be reported to the Headmaster immediately. The Headmaster will usually discuss the allegation with the DSL (unless the allegation is against the DSL) who will inform the Local Authority Designated Officer (LADO) at the earliest stage and within one working day. The school will act upon LADO advice. **Bromley LADO is Gemma Taylor (email: LADO@bromley.gov.uk phone: 020 8461 7775).**

If an allegation is made against a supply teacher, the Headmaster (or DSL acting on his behalf) will immediately contact both the agency concerned and the LADO. The school will support any investigation that is required and will act upon LADO advice.

If the allegation is against **the Headmaster**, the member of staff must inform the Chairman of Governors directly, or in his absence, the LADO. The Headmaster should not be informed at this stage. The Chair of Governors, Peter Doyle, can be contacted via the Clerk to Governors.

Should historical allegations of child abuse be made against **a teacher who is no longer teaching**, the School will, in accordance with KCSIE, advise the individual to report the matter to the police.

Allegations against **a teacher who is no longer working at the School** will also be referred to the designated officer(s) at the local authority where the member of staff is currently working.

Where an adult makes an allegation of historical abuse, they will be advised by the headmaster or DSL to report the allegation to the police. Where a child makes a non-recent allegation, the Headmaster or DSL will report this to the LADO in line with BSCP procedures for dealing with non-recent allegations. The LADO will co-ordinate with children's social care and the police. (KCSIE, 2025 paragraph 426).

Staff can refer concerns directly to the Local Authority without having discussed them with the Headmaster or DSL but should take the earliest opportunity to brief the DSL on the situation, in order to ensure clarity of communication channels for the Local Authority Designated Officer (LADO).

If an allegation is made against a member of school staff, the quick resolution of that allegation will be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays will be eradicated and the Headteacher will inform the accused person about an allegation as soon as possible after consulting with the designated officer(s), as outlined in KCSIE 2025, paragraph 392. The School will not undertake their own investigation of allegations without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations.

The Headmaster will consider to what extent the Disciplinary Policy and Procedure should be invoked with special regard to the section on suspension. The Chairman of Governors will be informed at this stage.

Suspension will be considered if there is cause to suspect a child is at risk of significant harm or the case is so serious that it might be grounds for dismissal. Appropriate weight will be given to the advice of the police and social services before the headmaster makes the decision to suspend. KCSIE 2025, paragraphs 386-390 will be followed.



If the LADO has advised that the matter should be dealt with by the school, then the school disciplinary procedures will be followed.

During the process parents/carers of a child/ren involved will be:

- Informed of the allegation (providing this does not impede the enquiry, disciplinary or investigative processes);
- Kept informed of progress and helped to understand processes;
- Made aware of the need to maintain confidentiality (KCSIE, 2025 paragraph 393)

The accused person will be:

- Treated fairly and honestly;
- Kept informed of progress by a named representative;
- Given appropriate support during the case;
- Kept informed about workplace developments if suspended;
- Advised to contact the union or professional association at the outset.

Every effort will be made to maintain confidentiality and guard against publicity while an allegation is being investigated/considered.

If there is to be no criminal investigation/prosecution, then the school will consider what further action is required. This may involve formal disciplinary action in line with the school's procedures.

Disciplinary action may result in options ranging from no further action to summary dismissal or not using the person's services in future.

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, the LADO will discuss with the employer whether a referral to the DfE's barred list is required and also whether a referral to a professional body is required. (See below).

If the allegations prove to be unfounded the matter will be referred to Children's social care. If there is concern that the allegation may have been deliberately invented, or malicious, the police will be informed.

Every effort will be made to reach a conclusion in all cases and settlement agreements must not be used i.e. where a person agrees to resign with no disciplinary action and an agreed future reference. Accurate and detailed records will be kept. A comprehensive summary of the allegations, follow up and resolution, decisions reached and actions taken will be kept on the individual's confidential file and given to the individual. It will be kept until the person reaches normal retirement age or for 10 years if longer.

It is the responsibility of the school to inform parents of other students at the school; this information should be kept to a minimum. The anonymity of the student should be maintained at all times.

If a member of staff is dismissed or resigns because he or she is considered unsuitable to work with children, this will be reported to the DBS (Disclosure and Barring Service) and TRA within one month of any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children leaving the school. Information and forms for referrals to DBS may be found at <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>. Information about referrals to TRA can be found at <https://www.gov.uk/government/publications/teacher-misconduct-referral-form>.

Low level concerns



The term low level concern does not mean that it is insignificant (KCSIE, 2025, paragraph 430). It means that it **does not meet the harms threshold as detailed in KCSIE 2025**, paragraph 359. Examples of low level concerns could include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone contrary to the school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language.

Low level concerns should be reported to the DSL who will respond in accordance with the Low Level Concerns Policy. Low level concerns about the DSL should be reported to the Headmaster.

The school's Low Level Concerns Policy should be read in conjunction with the school's staff code of conduct. This creates a culture of openness, trust and transparency in which the school's expectations for behaviour are lived, monitored and reinforced by all staff.

8 Whistleblowing

If, having reported an incident and having discussed it with the Designated Safeguarding Lead and the Headmaster, a member of staff feels that inappropriate or insufficient action has been taken in this case, the LADO will be informed immediately. There are also clear guidelines in the Staff Handbook about procedures for Whistleblowing and a separate Whistleblowing Policy, for staff to refer to if appropriate. This includes details of the NSPCC whistleblowing helpline: 0800 028 0285/0808 800 5000 and email: help@nspcc.org.uk.

9 Staff Recruitment

Eltham College operates safe recruitment procedures, including enhanced DBS and barred list checks in accordance with KCSIE (2025) [Check a teacher's record - GOV.UK](#). Appropriate checks are made on all individuals, including those who have lived or worked outside the UK in accordance with KCSIE 2025 and in line with DfE guidance. DBS checks are also made on staff working on the school site and on any other adults involved in school activities including trips and expeditions or other voluntary activities, in accordance with statutory regulations and our internal procedures. Volunteers have a clear job description or equivalent and are given basic child protection training. Full details can be found in the Recruitment Policy and Procedure.

Staff are advised during their induction and through the Code of Conduct (available in the staff handbook) to be aware of protecting themselves against allegations of abuse, by avoiding meetings in closed rooms on their own, and inappropriate use of physical contact or force, safe use of social media, not using personal mobile phones, giving lifts in cars amongst others. Staff also refer to the Acceptable use of IT and email policy.



10 Out of School Providers

At Eltham College we ensure that out of school providers meet guidance: [After-school clubs, community activities and tuition: safeguarding guidance for providers](#) (DfE, September 2023). Whilst the provider is responsible for their own safeguarding and child protection policies and procedures, the school may refer any concerns they have about the provider to the local authority.

11 Training, Sharing Information and Review

Training for staff is provided regularly, and at least annually, on a number of specific safeguarding issues including: Part 1 of KCSIE and Annex B, this policy and the staff code of conduct, mental health, online bullying, sexting (using the latest Government guideline: Sexting in schools and colleges: responding to incidents and safeguarding young people, which has been published by the UK Council for Child Internet Safety), drugs, radicalisation and the Prevent strategy, forced marriage, child-on-child abuse, sexual harassment and female genital mutilation (FGM).

Mechanisms to support staff in their understanding of KCSIE include a programme of training that includes outside speakers, online courses and quizzes and in house training provided by the DSL and regular updates in staff briefings and meetings. Additional detail on the training offered to new staff and some of the mechanisms used to keep training up to date for all staff is provided in the appendices.

The School recognises the need for good levels of communication between all members of staff to ensure that the procedures for safeguarding children will be followed. Information must be shared between professionals in order to promote children's well-being and protect individuals from harm. The School shares information in accordance with the Data Protection Act 2018 and the GDPR, the guidance set out in Chapter 1 of Working Together to Safeguard Children (2023) and in Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers.

'The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.'

The DSL or DDSL will train those students in a position of responsibility, for example prefects in basic safeguarding procedures and ensure that they understand that their role is to listen, not to investigate and not to keep 'secrets' but to refer to the DSL.

Any deficiencies or weaknesses in child protection arrangements are remedied without delay.

The Governors undertake an annual review of the school's child protection policy and procedures and of the efficiency with which they have been implemented.



APPENDIX 1 Induction in Child Protection and Ongoing Training

Introduction

Every new member of staff is required to undertake training in safeguarding and child protection. These are delivered either as online training from Educare, a reputable training provider, or sessions are organised by the Designated Safeguarding Lead. Every effort will be made to complete these before the end of your first week at the school. All new employees of our catering provider and all Governors are also required to complete such training.

The only adults who work or visit the school who are exempted from this requirement are:

- Night-time cleaners, whose hours of work mean that they do not have contact with students;
- Occasional visitors, including occasional lecturers and contractors, who sign in and are given a security badges by our Receptionist, and who are escorted throughout their visit;
- Contractors working on a designated site that is physically separated from the rest of the school, who are required to sign in and out at their site office and who wear security badges at all times;
- Contractors working during the school holidays.

Designated Safeguarding Lead

Eltham College's Senior School Designated Safeguarding Lead and Eltham College Junior School Designated Safeguarding Lead (who is also deputy head pastoral at the Junior School). Both (alongside DDSLs) have been fully trained for the demands of this role and regularly attend courses with other child support agencies to ensure that they remain conversant with best practice, and that our policies and procedures are current and follow best practice. They receive training at least every two years and maintain close links with the local Safeguarding Partnerships for Bromley and neighbouring boroughs. They liaise regularly with the Governor concerned with Child Protection. Key duties of the DSL can be found in KCSIE pages 171-177.

What is the reason for the training?

Child protection is always our top priority.

Every member of staff needs to be confident that he or she understands his or her role in:

- Keeping children safe;
- Promoting the welfare of students;
- Promoting equal opportunities and inclusion;
- Preventing bullying and harassment.

Everyone is required to take part in the training, no matter what their previous background or level of expertise. All members of staff formally receive the Staff Code of Conduct, which includes guidance regarding interaction with student. Refresher training for all staff is held annually.

What topics does the training cover?

Our induction training will tell you about:

1. Our student welfare systems

Starting with the roles of the following structures:

- The Governors



- The Senior Leadership Team and the DSL;
- The monitoring arrangements by the tutors and the pastoral teams;
- The role of the School Nurses, Counsellor and Nursing Assistant;
- The Prefect system and the training in leadership given to senior students;
- The role of the Student Leadership body;
- Our partnerships with parents and guardians.

We will also describe our arrangements for providing additional support for students with SEND and for whom English is an additional language.

2. The Legal Framework for our Child Protection and Anti-Bullying Policies

We describe this briefly and cover our policies on:

- Anti-bullying;
- Behaviour;
- Learning Support;
- Equal Opportunities;
- Educational Visits.

Teaching staff have a particular responsibility for supervising students and ensuring that they behave with consideration and good manners at all times; but all staff need to be made aware of the school's policies in these areas. All staff are reminded of their important role in building positive relationships, identifying risks and keeping everyone safe. We cover social media and online bullying, and the risks of the internet and social networking sites.

3. Understanding Challenging Behaviour

We draw upon national guidance relating to the safeguarding and protection of children, the signs of abuse, and the duties of staff, as well as the role of specialist agencies. We explain our expectations of how they should respond in a difficult situation and why they cannot promise confidentiality to a student.

4. The School's Policies on Safeguarding and Child Protection

All new staff will be expected to become familiar with our documents relating to:

- Safeguarding and Child Protection;
- Staff Code of Conduct;
- Students and confidentiality Issues;
- Practices and procedures when a member of staff faces allegations of abuse;
- Whistleblowing.

5. Visitors and Site Security

This covers the need for visitors to be signed in at Reception and to be escorted about the school.

6. Effective Record Keeping

We explain why effective record keeping matters and most importantly that all concerns, discussions and decisions and the reasons for those decisions must be recorded in writing. Records will be kept confidentially by the DSL, and reviewed regularly so that concerning patterns of behaviour can be spotted.



7. Refresher Training

The session concludes with reminding staff that refresher training is given annually and by requiring all attendees to certify in writing that they have completed the training session.

ECT Induction

Eltham College has opted to participate in the national arrangements for the induction of ECTs that are described in the Training and Development Agency for Schools' guidance "Supporting the Induction Process" (www.tda.gov.uk)

APPENDIX 2 Ten Points to Follow: Safeguarding Procedures

1. Take time to familiarise yourself with the safeguarding policy;
2. Be vigilant for the risk indicators which may indicate child abuse or neglect;
3. Do not be afraid to ask a student about something you have noticed that is causing you concern;
4. If you have any concerns, no matter how small they might seem, do not hesitate to discuss these with the Designated Safeguarding Lead;
5. Always stop and listen to someone who wants to tell you about incidents or suspicions of abuse;
6. Make notes about what was said as soon as possible afterwards. If you need to, make these notes at the time, but try to also give the person making the disclosure your full attention. **REMEMBER** always keep your original notes;
7. **DO NOT** give a guarantee that you will keep what is said confidential or secret. Explain that you will need to get help with this problem and who you will tell. Being open and honest about your actions, with a student who is suffering abuse, may enable the student to feel they can continue to trust you;
8. Do not ask leading questions (e.g. "did he do X to you?") just ask "what do you want to tell me?" or "is there anything else you want to say?";
9. Report immediately to the Designated Safeguarding Lead. **DO NOT** discuss the information with anyone else in school. Confidentiality in child protection cases is paramount. Staff should be aware that if a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the Police immediately.
10. NEVER think abuse is impossible, or that an accusation against someone you know well and trust is bound to be wrong.



APPENDIX 3 Wallet Sized Safeguarding Procedures

ALWAYS	NEVER
<ul style="list-style-type: none">• Follow the staff Code of Conduct• Be vigilant and make time to listen• Refer any concerns or disclosures to the DSL or Deputy DSL immediately	<ul style="list-style-type: none">• Promise confidentiality• Think it could not happen here• Ask leading questions

KEY CONTACTS: JUNIOR SCHOOL	KEY CONTACTS: SENIOR SCHOOL
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Appendix 4

Bromley Thresholds of Need Guidance November 2023 document is available here:

[Bromley LSCB - Thresholds of Need 2023 \(bromleysafeguarding.org\)](https://www.bromleysafeguarding.org/Bromley-LSCB-Thresholds-of-Need-2023)