

Safeguarding Policy Checklist (September 2025)

Note for this edition of the checklist

Very few changes have been made to Keeping children Safe in Education for September 2025. The following points need reflecting in your policy:

- Add to the section on online harms, misinformation, disinformation and conspiracy theories (see KCSIE 2025, paragraph 135).
- Where schools make use of Alternative Provisions ensure that section of your policy (or related policies, like behaviour or attendance) references the following from KCSIE 2025, paragraphs 168 - 170: *'where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs'*. You might also wish to add how you specifically do that in your school.

Keeping Children Safe in Education (2025), paragraph 98, describes what an effective child protection policy should include and this checklist should be used alongside that guidance.

Question	Yes/ No	If 'No', read the following and insert the appropriate information at a suitable place in the policy
When reviewing the policy make sure to update all references to Keeping Children Safe in Education (2025) are changed to (2025) and any paragraph numbers referenced have been revised.		
Make sure that the correct definition of safeguarding is included in the policy. (see right)		KCSIE (2025), paragraph 3: Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: • providing help and support to meet the needs of children as soon as problems emerge • protecting children from maltreatment, whether that is within or outside the home, including online

		• preventing the impairment of children's mental and physical health or development • ensuring that children grow up in circumstances consistent with the provision of safe and effective care • taking action to enable all children to have the best outcomes.
The policy should state the school's commitment to safeguarding and that it aims to create a culture of vigilance. Children may not be ready to talk about their experiences See KCSIE (2025), paragraph 17		At [name of school] we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child. Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered 'that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful...This should not prevent staff from having a professional curiosity and [speak] to the DSL'.
The policy should be clear about how children are given opportunities to learn about safeguarding, including online. See KCSIE (2025), paragraphs 128-133 for a list of issues that should be covered. <i>See also the guidance documents for Relationships Education (for all primary pupils), and Relationships and Sex Education (for all secondary</i>		Children at [name of school] are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. [Perhaps give two or three examples of how children are helped to 'recognise when they are at risk and how to get help when they need it.]

<i>pupils) and Health Education (for all primary and secondary pupils).</i>		
Extra-familial harms The policy should refer to the importance of considering wider environmental factors in a child's life that may be a threat to their safety and/or welfare.		The school assesses the risks and issues in the wider community when consider the well-being and safety of its pupils. KCSIE (2025), paragraph 21 says: 'All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and 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.'
Some policies may include the legislation that covers safeguarding in schools, in which case the list must be up to date.		Where schools refer to this legislation, it should be up to date, but I'm not convinced it is necessary. The DfE have not included a list of relevant legislation since 'Keeping Children Safe in Education (2016)'. Any legislation listed must be 'fact-checked' at the time of publication, as legislation can change without notice and others become obsolete.
The policy should outline the definitions, signs and symptoms of the four kinds of abuse and neglect.		Types of Abuse and Neglect can be found in 'Keeping Children Safe in Education (2025)' (Part 1 and Annex B) These signs and symptoms could be copied into the policy document. Note also the child-on-child abuse in paragraphs 30 - 33: 'All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and

		responding where they believe a child may be at risk from it.' Make sure reference is made to the sentence in paragraph 24: 'Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.'
The policy should include the statutory definition of child sexual exploitation and published in February 2017. Where relevant reference could be made to the signs and symptoms. It is worth noting that CSE includes young people aged 16 and 17 who are over the age of sexual consent. See KCSIE (2025) paragraph 38-40.		The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017) Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) 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. Indicators of child sexual exploitation may include: • Acquisition of money, clothes, mobile phones, etc. without plausible explanation; • Gang-association and/or isolation from peers/social networks; • Exclusion or unexplained absences from school, college or work; • Leaving home/care without explanation and persistently going missing or returning late; • Excessive receipt of texts/phone calls; • Returning home under the influence of drugs/alcohol;

		• Inappropriate sexualised behaviour for age/sexually transmitted infections; • Evidence of/suspicious of physical or sexual assault; • Relationships with controlling or significantly older individuals or groups; • Multiple callers (unknown adults or peers); • Frequenting areas known for sex work; • Concerning use of internet or other social media; • Increasing secretiveness around behaviours; and • Self-harm or significant changes in emotional well-being. Potential vulnerabilities include: Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues. • Having a prior experience of neglect, physical and/or sexual abuse; • Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example); • Recent bereavement or loss; • Social isolation or social difficulties; • Absence of a safe environment to explore sexuality; • Economic vulnerability; • Homelessness or insecure accommodation status; • Connections with other children and young people who are being sexually exploited; • Family members or other connections involved in adult sex work; • Having a physical or learning disability;
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		• Being in care (particularly those in residential care and those with interrupted care histories); and • Sexual identity. More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)
The policy should include information about Child Criminal Exploitation (CCE)		Information about Child Criminal Exploitation can be found in KCSIE (2025) paragraphs 34 - 40 and Annex B pages 150 -151. Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. Some of the following can be indicators of CCE: • children who appear with unexplained gifts or new possessions; • children who associate with other young people involved in exploitation; • children who suffer from changes in emotional well-being; • children who misuse drugs and alcohol; • children who go missing for periods of time or regularly come home late; and • children who regularly miss school or education or do not take part in education.

The policy should include information about 'County Lines'.	'County Lines' is: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. See KCSIE (2025) page 151 and 152, which also includes relevant indicators of harm.
The policy should include information about Domestic Abuse Note that the correct phrase to use is domestic <i>abuse</i>, not domestic <i>violence</i>. This is because there are other kinds of domestic abuse, not only violence. (See KCSIE (2025) Part 1 paragraph 41 and Annex B pages 154 - 155)	Definition The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other: (a) physical or sexual abuse; (b) violent or threatening behaviour; (c) controlling or coercive behaviour; (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and (e) psychological, emotional or other abuse. People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to

Operation Encompass	marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives. The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. (The definition can be found here: https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted) Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Operation Encompass Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. See Operation Encompass website: https://www.operationencompass.org/ The school policy should now refer to Operation Encompass, explain what it is and what the school might do with that information. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have
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		experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate).]
The policy should include the signs and symptoms of female genital mutilation (FGM); and information about what teachers (specifically) should do to report. Female Genital Mutilation reporting procedures Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2025), paragraph 42 says 'whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'. Further information can be found in KCSIE (2025), pages 161 - 163. What is often less well-know is what a teacher should do next to make a report. Below is a <i>very short summary</i> and must be read in conjunction with the mandatory reporting guidance. (See https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information) The mandatory reporting procedures say: 'It is recommended that you make a report orally by calling 101, the single non-emergency number.' 'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.		Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Risk factors for FGM include: • low level of integration into UK society • mother or a sister who has undergone FGM • girls who are withdrawn from PSHE • a visiting female elder from the country of origin • being taken on a long holiday to the country of origin • talk about a 'special' procedure to become a woman Symptoms of FGM FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK. Indications that FGM may have already taken place may include: • difficulty walking, sitting or standing and may even look uncomfortable. • spending longer than normal in the bathroom or toilet due to difficulties urinating.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'. The procedures also set out what information is needed, in order to make a report. See here: https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting		• spending long periods of time away from a classroom during the day with bladder or menstrual problems. • frequent urinary, menstrual or stomach problems. • prolonged or repeated absences from school or college, especially with noticeable behaviour changes (for example, withdrawal or depression) on the girl's return • reluctance to undergo normal medical examinations. • confiding in a professional without being explicit about the problem due to embarrassment or fear. • talking about pain or discomfort between her legs
The policy should include a section about mental health and possible links to safeguarding and child protection		All staff [at name of school] 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. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy. <i>[Explain how to do this in your school.]</i> <i>If the school has a Senior Mental Health Lead, they should be named here, along with information about how they can be contacted.]</i>
The policy should include a reference to highlight that children who have a social worker, have a potentially greater risk of harm		At [name of school], 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 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. <i>[Give a couple of examples which illustrates how the school helps pupils with a social worker.]</i>
The policy should refer to the mandatory duty on teachers to report disclosures on FGM about a female under 18 personally to the police. (see above)		The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made). Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. <u>The duty does not apply in relation to at risk or suspected cases.</u>
The policy should refer to so-called 'Honour-based' Abuse Note that the correct phrase to use is so-called 'Honour-based' Abuse, not 'Honour-based' violence. This is because there are other kinds of 'Honour-based' abuse, not only violence.		So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.
Age of consent for marriage		Since February 2023, the age of consent for marriage in England is 18. The Marriage and Civil Partnership (Minimum Age) Act 2022 means that 16 and 17 year olds may not marry or enter a civil partnership, even if they have parental consent. It is an offence, under the Marriage and Civil Partnership (Minimum Age) Act to cause a child under the age of 18 to enter

		a marriage in any circumstances, without the need to prove that a form of coercion was used. This includes non-legally binding 'traditional' ceremonies which would still be viewed as marriages by the parties and their families. Any concerns that students may be getting married should be referred to the DSL.
Children who are absent from education The policy should set out the school's approach to tackling absence. The policy should explain what the school does when children have poor attendance or are regularly missing. The policy should say that parents should ensure that the school has at least two emergency contacts for their child. <i>Further information can be found in 'Working together to improve school attendance'</i> https://www.gov.uk/government/publications/working-together-to-improve-school-attendance		Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change. In response to the guidance in Keeping Children Safe in Education (2025) the school has: 1. Staff who understand what to do when children do not attend regularly 2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions). 3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage. 4. Procedures to inform the local authority when we plan to take pupils off-roll when they: a. leave school to be home educated b. move away from the school's location

		c. remain medically unfit beyond compulsory school age d. are in custody for four months or more (and will not return to school afterwards); or e. are permanently excluded We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.
Filtering and Monitoring It is important to ensure that the safeguarding policy covers these issues and explains how filtering and monitoring has been included in the work of the school, so that children and young people are kept safe. Filtering and monitoring is not a standalone area of safeguarding and impacts on a number of areas, ensure that the policy reflects this.		Filtering and Monitoring needs to be included in: • the DSL's role; • staff training (as does an expectation that they have also received training in cyber-security); • any risk management plans for vulnerable children; Statements to make include: • Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include [specify those that are in use]: ○ Physical monitoring ○ Live software monitoring ○ Monitoring user logs ○ Monitoring individual devices • We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures. • Each year (at least) our designated safeguarding lead, along with our IT team and a governor, review our filtering and monitoring procedures to ensure that they effectively prevent 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 our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns • All our staff have taken part in annual cybersecurity training
Out-of-school Providers Where schools host out-of-school providers on their premises, they should ensure that the provider meets the guidance in After-school clubs, community activities and tuition: safeguarding guidance for providers (DfE, September 2023). Schools should follow their own safeguarding and child protection procedures where they have concerns about the out-of-school provider. This may include contacting the local authority designated officer in the case of concerns about adults.		Where schools host out-of-school providers on their premises, they should note in their safeguarding and child protection policy that 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.
The policy should include the school's duties under the Counter Terrorism and Security Act 2015 (The 'Prevent Duty')		<i>[Note there is no requirement to have a separate policy for the Prevent duty, but schools may wish to do so.]</i> As a minimum, schools should include the following in their safeguarding policy. As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead. The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. 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. Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society. Recognising Extremism Early indicators of radicalisation or extremism may include: • showing sympathy for extremist causes • glorifying violence, especially to other faiths or cultures • making remarks or comments about being at extremist events or rallies outside school • evidence of possessing illegal or extremist literature • advocating messages similar to illegal organisations or other extremist groups • out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.) • secretive behaviour
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		• online searches or sharing extremist messages or social profiles • intolerance of difference, including faith, culture, gender, race or sexuality • graffiti, art work or writing that displays extremist themes • attempts to impose extremist views or practices on others • verbalising anti-Western or anti-British views • advocating violence towards others
Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. (This should also link into the SEND policy)		Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include: • assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; • these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; • the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and • communication barriers and difficulties in managing or reporting these challenges At [school name] we provide [extra pastoral support and attention for these children], along with ensuring any appropriate support for communication is in place, for example,.... <i>[Explain here the</i>

		<i>steps taken to give additional support to pupils with SEND]</i>
Ensure this section about child-on-child abuse is in line with the requirements set out in KCSIE (2025), paragraphs 30-33. Governing bodies and proprietors should ensure that their child protection policy includes processes, procedures and systems to minimise the risk of child-on-child abuse and to deal with it in a timely way when it does happen. All staff should be clear as to the school's or college's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. Reference should be made to the UK Council for Internet Safety (UKCIS) Guidance: Sharing nudes and semi-nudes (March 2024); and see also: Child sexual abuse material generated by artificial intelligence (June 2025) (NCA/CEOP/IWF). Any procedures for searching, deleting and confiscating devices should be included in the educational setting's safeguarding or child protection procedures. <i>Remember that child-on-child abuse also needs to be referenced in the school's Behaviour Policy, and could be referenced in the Relationships...policy.</i>		Governing bodies and proprietors should ensure that their child protection policy includes: • procedures to minimise the risk of child-on-child abuse; • the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously; • how allegations of child-on-child abuse will be recorded, investigated and dealt with; • clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported; • a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported; • a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off, for example, as "banter", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children; • recognition that it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously; and • the different forms peer on peer abuse can take, such as: • bullying (including cyberbullying, prejudice-based and discriminatory bullying); • abuse in intimate personal relationships between peers; • physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; • sexual violence and sexual harassment.

Sexual violence and/or sexual harassment (see KCSIE (2025), Part Five, beginning on pages 105) Risk Assessments Report of sexual violence or sexual harassment should include the time and location of the incident. Subsequent risk assessments will include any actions required to make the location safer. Impact on any siblings It is important to understanding intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.		KCSIE 2025 Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to reports of sexual violence and sexual harassment. Sharing nudes and semi-nudes (previously known as 'sexting') In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS) Guidance: Sharing nudes and semi-nudes (March 2024); and Child sexual abuse material generated by artificial intelligence (June 2025) (NCA/CEOP/IWF). Schools should ensure that their policy is in line with the guidance outlined in paragraph 487.)
The policy should define 'Private Fostering' and note that there is a mandatory duty to inform the local authority of children in such arrangements. See KCSIE (2025) Paragraphs 340 - 343)		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. 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.
The policy should set out the role of the Designated Safeguarding Lead <i>*The Virtual Headteacher has responsibility to promote the education of children who have a social worker – the school policy ought to refer to that responsibility and how that is implemented in the school</i>		The Designated Safeguarding Lead is responsible for safeguarding and child protection at [name of school]. The key role of the Designated Safeguarding Lead is to: • manage referrals from school staff or any others from outside the school; • work with external agencies and professionals on matter of safety and safeguarding; • undertake training; • raise awareness of safeguarding and child protection amongst the staff and parents; and • ensure that child protection information is transferred to the pupil's new school • be aware of pupils who have a social worker*

		• help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff • work with others to ensure that the school's filtering and monitoring systems are functional and effective
The school has at least two Designated Safeguarding Leads and these are named in the policy, along with contact details.		One way to do this is to include a flowchart, which is to be found as a separate document: Safeguarding Flowchart v.3.9. (see appendix 3 of this document). This flowchart can also be used to show the steps DSLs should use to make external referrals (see below)
The school has a named governor for safeguarding who is identified in the policy, along with appropriate contact details. The policy should also name the person to whom concerns about the headteacher can be taken.		
The policy is clear that staff should promptly share their concerns in writing with the DSL and sets out the procedure for doing so.		Ensure that the school has set out how adults report concerns they have about children. Where the policy does not set out the reporting process, add these headings and highlight in yellow, noting that the school's DSL should fill in the gaps. Reporting Concerns When adults in the school have a concern about a child or young person they should: Complete a concern form in writing or make an entry in the electronic recording system <i>[promptly/within (for example) ten minutes/other suitable phrase]</i> Concern Forms can be found [state where] The DSL should be informed that a concern has been raised by [state how the DSL is to be informed] Where the school uses an online system for recording concerns, the policy should reference how this should be used.
The policy should be clear that all verbal conversations should be promptly recorded in writing.		
There should be an identified single location for the delivery of concern forms and a clear method for alerting the DSL that a concern form has been raised.		
It should be clear in the policy what to do if the DSL is not available.		If the DSL is not available, staff should speak to a member of the SLT and/or take advice from local children's social

		care (KCSIE (2025), paragraph 53). The DSL should be informed as soon as possible.
LOW LEVEL CONCERNS ABOUT STAFF BEHAVIOUR The school or college policy should set out the procedure for responding to reports of low-level concerns. The policy should be clear that any concerns about the conduct of other adults in the school should be taken to the headteacher/principal; and concerns about the headteacher/principal should go to the Chair of Governors. (Where the headteacher is also the sole proprietor of an independent school, or there is a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs)). NOTE THAT LOCAL PROCEDURES MAY DIFFER AND YOU MAY NEED TO REFER LOW LEVEL CONCERNS TO YOUR LADO.		LOW LEVEL CONCERNS ABOUT STAFF BEHAVIOUR Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors At [name of school] we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the headteacher without delay; any concerns about the headteacher should go to the Chair of Governors who can be contacted by [state method of contact]. Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the headteacher/principal. Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. The headteacher/principal has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below). Allegations It is an allegation if the person* 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 he or she may pose a risk of harm to children; and/or • behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school). (*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.) Allegations should be reported to the LADO 'without delay'. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these. Low-level Concerns Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to: • being over friendly with children; • having favourites; • taking photographs of children on their mobile phone; • engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or, • using inappropriate sexualised, intimidating or offensive language. <i>[Schools should ensure that their Code of Conduct is clear about what low-level</i>
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	<i>concerns are and why it is important that such concerns are shared.]</i> If the concern has been raised via a third party, the headteacher/principal should collect as much evidence as possible by speaking: • directly to the person who raised the concern, unless it has been raised anonymously; • to the individual involved and any witnesses. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified. Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. Low-level concerns should be recorded in writing, including: • name* of individual sharing their concerns • details of the concern • context in which the concern arose • action taken (* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible) Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for
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		an allegation, then the matter should be referred to the LADO. The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again. See also Developing and implementing a low-level concerns policy (Farrer & Co., 2023). https://www.farrer.co.uk/news-and-insights/developing-and-implementing-a-low-level-concerns-policy-a-guide-for-organisations-which-work-with-children2/
		The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has: • behaved in a way that has harmed a child, or may have harmed a child; • possibly committed a criminal offence against or related to a child; • behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or • behaved or may have behaved in a way that indicates they may not be suitable to work with children.
In proprietor-led independent schools, concerns about the proprietor(s) should be taken directly to the local authority Designated Officer (LADO).		Where there are concerns about the proprietor of an independent school, the member of staff should contact the local authority Designated Officer without delay. <i>[The contact name and number should be included in this policy.]</i>
The policy should be clear about the steps the DSL should take in order to refer a concern outside the school, eg. a social services enquiry or to the		One way to do this is to include a flowchart, which is to be found as a separate document: Safeguarding Flowchart v.3.9 (see appendix 3 of this document).

local authority Designated Officer (LADO). An up-to-date list of relevant names and contacts details should be included in the policy.		This flowchart can also be used to show the names and contact details of the DSLs and the link governor for safeguarding (see above)
The policy should set out the training opportunities for staff in different roles; and the type and frequency of training.		The key training elements are: Induction Training – this is mandatory and should include; • the child protection policy; • the behaviour policy; • the staff behaviour policy (sometimes called a code of conduct); • the safeguarding response to children who go missing from education; and • the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (see KCSIE (2025) paragraph 99) DSLs – attend training every two years; and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually. All other staff – will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Members of the Governing Body of the school take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.' This training is regularly updated. (see KCSIE (2025), paragraph 79.) Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.
The policy should refer to Whistleblowing		Where there are concerns about the way that safeguarding is carried out in the

		school, staff should refer to the Whistle-blowing Policy. A whistleblowing disclosure must be about something that affects the general public such as: • a criminal offence has been committed, is being committed or is likely to be committed • an legal obligation has been breached • there has been a miscarriage of justice • the health or safety of any individual has been endangered • the environment has been damaged • information about any of the above has been concealed. The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.
The policy should be self-contained and not rely on other documents to understand it. (Any appendices should be kept as part of the whole document.)		The policy could refer to other sources of information, but the core policy should enable staff (and volunteers) to understand exactly what their responsibilities are, what the issues are and how to raise a concern. NOTE Where links are given to online content, remember that these cannot be easily used if the document is printed. Links do change or may otherwise become unavailable and ought be checked periodically (at least annually).
The policy should have a publication date and a review date (not later than one year from publication). Typically, these dates are put on the front cover.		It is intended that the policy is a 'live' document and should be updated when necessary, 'at least' once a year.

The policy should set out the other relevant documents all staff must have read: • Keeping Children Safe in Education (2025) [Part One]; and school leaders and staff that work directly with children should also read Annex B • Staff Code of Conduct • Safeguarding and Child Protection Policy • School's Behaviour Policy • School Policy for Children Missing Education		
The policy should refer to confidentiality and the school's information sharing policy, which should be based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, May 2024) The document can be downloaded here: https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice The guidance is clear that information may be shared where there are safeguarding concerns. Whilst consent to share is not necessarily required, there must be a legal basis to share. It is recommended that the new guidance is read and discussed with the information sharing team, for example, the DSL and the Data Protection Officer, to ensure that the school's processes are compliant.		It may be useful to quote the following statement from Keeping Children Safe in Education (2025), paragraph 118: '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.'
Online safety and the school or college's approach to it should be reflected in the child protection policy. Note that guidance about online learning can be found in the 'Guidance for Safer Working Practices... (February 2022)' which		Online safety and the school or college's approach to it should be reflected in the child protection policy. The policy should reference the '4Cs' (Content/Contact/Conduct/Commerce). This will provide the basis of an effective online policy. The school or college

can be found here: https://saferrecruitmentconsortium.org <i>Note that there is a requirement to 'regularly review' the effectiveness of the monitoring and filtering arrangements see KCSIE (2025), paragraph 140.</i>		should have a clear policy on the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst at school or college, sexually harass their other children via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. At [name of school] we manage this risk by: "When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness. However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use, as a school we..." The policy needs to refer to how children will be kept safe when they are accessing 'online learning' whilst out-of-school.
"Where appropriate", [the child protection policy] reflects serious violence		See KCSIE (2025) paragraph 46
Children who are lesbian, gay, bi, or transgender (LGBT) IMPORTANT NOTE As at 1st September 2025, this section is under review by the government.		See KCSIE (2025), page 56
The current safeguarding and child protection policy should be available on the school's website. <i>It is always worth checking that this link actually works.</i>		

Appendix 1

Indicators of abuse and neglect

See: Keeping Children Safe in Education (September 2025) paragraphs 24 - 28

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as 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 children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

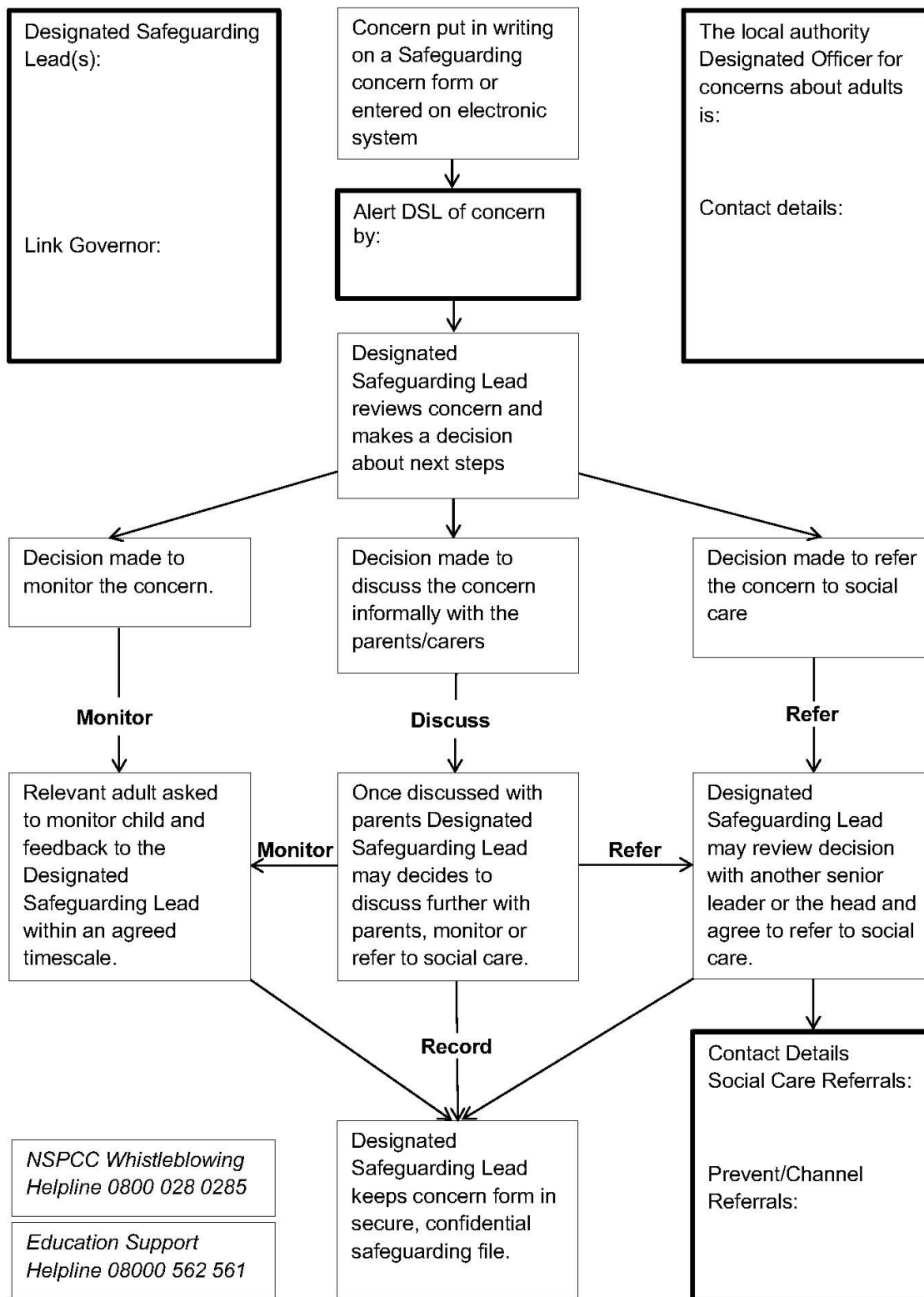
Appendix 2

Legislation related to safeguarding in schools

There is no need to list relevant legislation, but if the school does so, it must be correct and up-to-date. The government no longer provides a separate list. If you specify legislation in your school policy, it is essential that you 'fact-check' it to make sure it is correct. As far as I am aware there is no single definitive list of relevant legislation.

Appendix 3

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



(Note I can't include this out as an editable file because it doesn't keep its formatting. Sorry.)