



Melrose Education
LIMITED

Safeguarding and Child Protection Policy

To be read in conjunction with each School Specific Safeguarding Information

Reviewed by:	Henrietta Jordan, Schools Director, Company Deputy Strategic Safeguarding Lead; Company Prevent Lead
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Melrose Education Limited, and its subsidiary schools, recognise their moral and statutory responsibility to safeguard and promote the welfare of all children/learners and expects all staff, members of our governance and school community boards, and volunteers to share this commitment. We recognise that all children, regardless of age, disability, SEND, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse. Effective safeguarding is inclusive, anti-discriminatory and child centred. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse (emotional, physical, and sexual) and neglect and follow our procedures to ensure that children receive effective support, protection, and justice. We listen to our children/learners and take seriously what they tell us. Children/learners are aware of the adults they can talk to if they have a concern. Where there are concerns about a child/learner's welfare, we recognise the importance of timely information sharing and working in partnership with parents/carers and other agencies. Wherever appropriate and safe to do so, concerns will be discussed with parents/carers. However, information may be shared without first seeking consent or informing parents/carers where this is necessary to safeguard a child, where doing so could place a child or another person at increased risk, prejudice an investigation or cause unnecessary delay.

This Safeguarding and Child Protection policy underpins and guides our safeguarding procedures and protocols.

Purpose, Mission, Vision, and Values

Each school has their own purpose, mission, vision, and values which underpins the PMVV of Melrose Education. These are:

Our purpose – to equip every learner with the foundations, education, qualifications, skills, and opportunities needed for lifelong success.

Our mission – to provide inspirational and outstanding education in a truly positive, empathetic, and transformational environment.

Our vision – to create a group of inclusive schools where individuality and achievement is celebrated so that every learner can exceed their potential through equity of care, education, and opportunity.

Our values – this will be delivered through an uncompromising commitment to quality, integrity, empathy, equality, mutual respect, and trust.

Terminology

Safeguarding and promoting the welfare of children is defined 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 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.
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Staff refers to all those working for or on behalf of the company/school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

A child is anyone who has not yet reached their 18th birthday.

Parents refers to birth parents and other adults who have a parenting role, including stepparents, foster carers, adoptive parents, and local authority corporate parents. Where appropriate, safeguarding practice should also recognise the child's wider family network and kinship care arrangements.

Safeguarding Legislation and Guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

Legislation

- [Children Act 1989](#)
- [Children Act 2004](#)
- [Education Act 2002 – Section 157](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Education \(Independent School Standards\) Regulations 2014](#), as amended
- [Counter-Terrorism and Security Act 2015](#)
- [Data Protection Act 2018](#) and UK GDPR
- [Domestic Abuse Act 2021](#)
- [Online Safety Act 2023](#)
- [Crime and Policing Act 2026](#)
- [Children's Wellbeing and Schools Act 2026](#)

Statutory and Other Relevant Guidance

- [Keeping Children Safe in Education 2026](#) – statutory guidance effective from 1 September 2026.
- [Working Together to Safeguard Children 2026](#).
- [Independent School Standards Guidance – April 2026](#). The current guidance confirms that independent schools' safeguarding arrangements should have regard to KCSIE, Working Together and Working Together to Improve School Attendance.
- [Working Together to Improve School Attendance](#).
- [Prevent Duty Guidance for England and Wales](#).
- [Safeguarding learners vulnerable to radicalisation](#).
- [What to do if you're worried a child is being abused: advice for practitioners](#).
- [Meeting digital and technology standards in schools and colleges](#).
- [Data protection in schools – sharing personal data](#).
- [Information Sharing Duty – statutory guidance](#)
- [Information sharing duty: Operation Encompass](#).
- [Working or volunteering in regulated activity with children](#)
- [Early Years Foundation Stage statutory framework – group and school-based providers, September 2026](#) - where applicable to the school's provision.
- [SEND Code of Practice: 0 to 25 years](#).
- [Teachers' Standards](#).

[Non-association independent school inspection toolkit and operating guide – September 2026](#)

- the new inspection approach has explicit evaluation of safeguarding, inclusion, behaviour and attendance, personal development and wellbeing, leadership, and governance

Policy Principles, Aims and Values

The welfare of the child is paramount:

- All children, regardless of age, disability, SEND, gender reassignment, race, religion or belief, sex, sexual orientation, culture, language or individual circumstances, have an equal right to protection from harm, safeguarding support, and opportunities to achieve the best possible outcomes.
- We recognise that safeguarding is everyone's responsibility. All adults, including permanent and temporary staff, volunteers, Directors and members of our schools' community boards, have a duty to safeguard and promote the welfare of children/learners and a responsibility to act on any concern that a child/learner may be experiencing, or at risk of experiencing, harm.
- Safeguarding practice will be child-centred, inclusive, and anti-discriminatory, recognising the individual needs, circumstances, and lived experiences of each child/learner.
- Our schools will provide caring, positive, safe, and stimulating environments that promote children's/learners' physical and mental health, wellbeing, development, belonging, and educational outcomes.
- We recognise that harm may occur within or outside the home, including online, and that children may experience multiple and overlapping forms of harm.
- Children/learners will be listened to, and their wishes, feelings and lived experiences will be considered when decisions are made about them. We recognise that some children may communicate their experiences through behaviour or other means rather than verbally.
- Children/learners and staff involved in safeguarding and child protection matters will receive appropriate support and, where appropriate, supervision.

This policy aims to:

- raise the awareness of all staff of their individual and collective responsibility to safeguard and promote the welfare of children/learners.
- ensure staff understand how to recognise indicators of abuse, neglect, exploitation, and other safeguarding concerns.
- provide all staff with clear guidance about the procedures they should follow where they have concerns that a child/learner is experiencing, or may be at risk of experiencing, harm.
- promote early identification and timely help and support, recognising that action should be taken as soon as problems emerge.
- ensure that the DSPL/DDSL considers appropriate assessment, support, intervention, and referral to other agencies where required.
- promote professional curiosity and ensure that concerns are considered in the context of the child's/learner's wider circumstances and lived experience.
- support effective information sharing and multi-agency working to safeguard children/learners.
- ensure children/learners know that they will be listened to, taken seriously, and supported when they raise concerns.
- promote a strong safeguarding culture in which staff feel confident to raise concerns, respectfully challenge decisions and escalate concerns where necessary.

This Policy aims to:

- raise the awareness of all staff of the need to safeguard children/learners.
- provide all staff with guidance on the procedures they should adopt if they suspect a child/learner, young person may be experiencing, or be at risk of experiencing, harm. Including (by DSPL/DDSL) consideration to the use of appropriate assessments, resources, and agency support.

We recognise that children/learners with SEND and disabilities may face additional safeguarding vulnerabilities and barriers to communicating abuse, neglect, or other concerns.

Behaviour, communication difficulties, or changes in presentation will not automatically be attributed to a child's disability or additional needs, and staff will remain professionally curious about what the child/learner may be communicating.

Supporting and Protecting Children:

- We recognise that children/learners who have experienced trauma, abuse, neglect, exploitation, or other adverse life experiences may experience barriers to communicating their concerns or seeking help. Their experiences may affect their mental health, behaviour, relationships, development, attendance, engagement, and ability to learn. Children may communicate distress in many different ways, including through changes in behaviour, withdrawal, aggression, anxiety, emotional dysregulation, or other changes in presentation.
- We recognise the impact on children/learners of harm experienced within and outside the home, including online, and understand that familial, contextual, and online harms may overlap. Staff will remain professionally curious and consider what behaviour may be communicating rather than viewing it simply as something to be managed.
- For children who have experienced abuse, neglect, trauma or instability, school can provide an important source of safety, consistency, trusted relationships and belonging. Schools therefore have an important role not only in recognising and responding to harm, but in providing help and support as soon as problems emerge and preventing concerns from escalating.
- We would also notify Children's Social Care as soon as possible. Waiting for threshold to be met could be detrimental to the child.

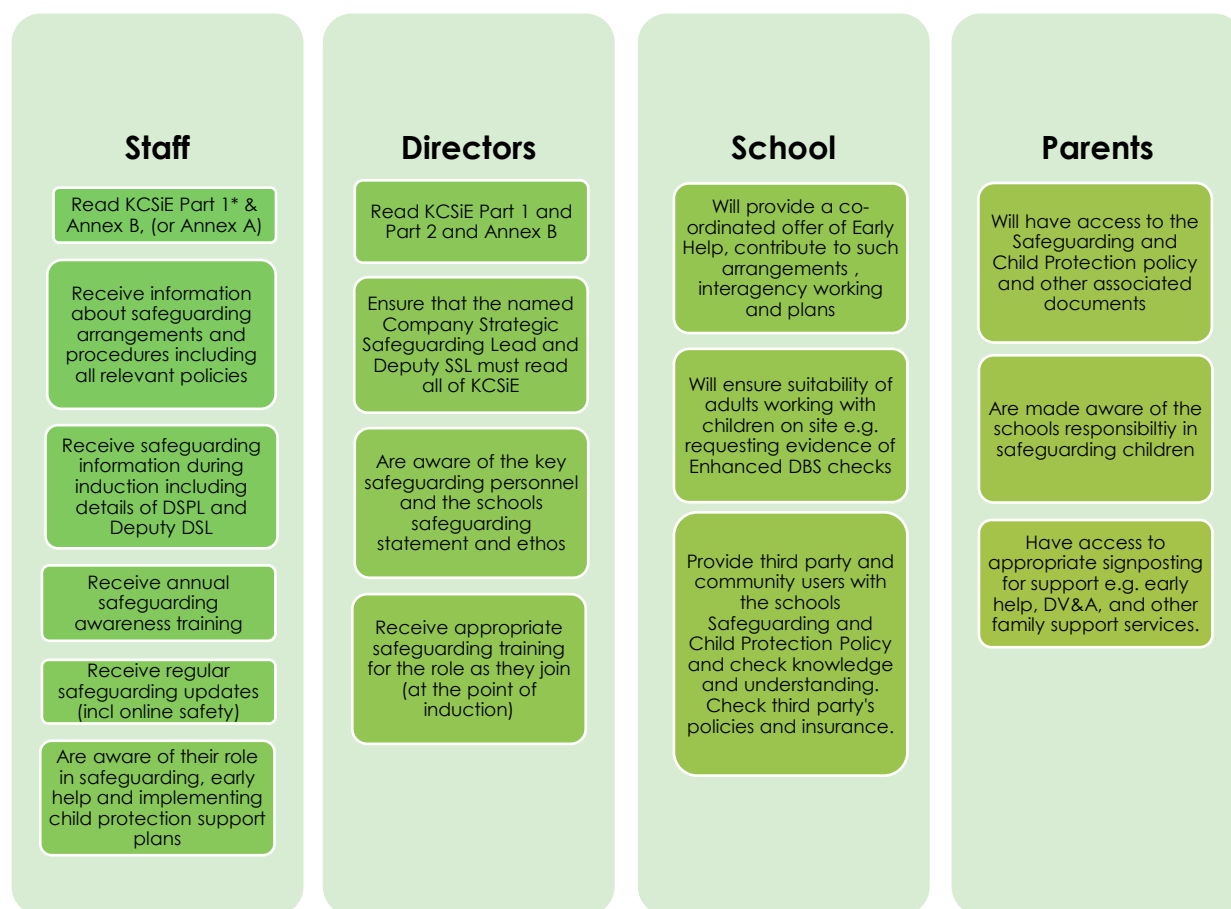
Our schools will support all children/learners (whether that is within or outside the home including online) by:

- providing help and support to meet the needs of children as soon as problems emerge.
- encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying (including cyber bullying).
- promoting a caring, safe, and positive environment within the school and providing children/learners with good lines of communication with trusted adults, supportive friends, and an ethos of protection.
- responding sympathetically to any requests for time out to deal with distress and anxiety.
- offering details of helplines, counselling, or other avenues of external support.
- liaising and working together with all other settings/schools, support services and those agencies involved in the safeguarding of children, including working collaboratively with parents/families.
- notifying Children's Social Care as soon as there is a significant concern that meets threshold.
- ensuring appropriate information is shared confidentially at key transition points in a child/learner's journey to ensure continued support (including school medical records).
- sharing relevant and proportionate safeguarding information appropriately and securely, including at transition and when children/learners move between settings.
- ensuring safeguarding and child protection records are transferred securely, separately from the main learner file and within statutory timescales when a learner leaves the school.
- ensuring children/learners are taught to understand and manage risk through our Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of school life. This includes online safety.
- accessing and using the necessary resources, guidance, and toolkits to support the identification of children/learners requiring mental health support, support services, and assessments.
- reassuring victims that they are being taken seriously and that they will be supported and kept safe.

The school will protect children by:

- working to establish and maintain an ethos where children/learners feel secure, are encouraged to talk, and are always listened to.
- ensuring that all children/learners know there are adults in the school whom they can approach if they are worried or in difficulty, recognising that some children may communicate concerns non-verbally, through behaviour or using alternative and augmentative communication.
- including regular consultation with children/learners, parents, and staff, gathering their voice.
- including safeguarding across the curriculum to equip children/learners with the skills they need to stay safe from harm and to know to whom they should turn for help; in particular this will include anti-bullying work, information about child-on-child abuse (sexual harassment and sexual violence, consent), online safety, road safety, pedestrian and cycle training; provide focused activities to prepare key year groups for transition to new settings and/or key stages e.g. more personal safety/independent travel; and
- ensuring all staff, children/learners and parents are aware of school guidance and the safeguarding issues around the use of mobile technology (mobile phones, social media, smart and wearable technology, artificial intelligence, and other emerging technologies), including the use of social media and their associated risks.
- ensuring safeguarding education is accessible and adapted so that children with SEND are not excluded from opportunities to learn how to recognise unsafe situations, communicate concerns and seek help.

Safe Schools, Safe Staff



Roles and Responsibilities

Melrose Education Limited and its schools will follow the statutory guidance set out in Keeping Children Safe in Education 2026 (KCSiE), Working Together to Safeguard Children 2026, and other relevant legislation and statutory guidance.

Safeguarding is everyone's responsibility. Clear roles, responsibilities, and lines of accountability will be maintained for:

- Directors, proprietors, and members of school community boards.
- Principals and senior leadership teams.
- the Company Strategic Safeguarding Lead and Deputy Strategic Safeguarding Lead.
- Designated Safeguarding and Prevent Leads (DSPLs).
- Deputy Designated Safeguarding Leads (DDSLs); and
- all staff, volunteers and others working on behalf of the school.

Directors

Directors will ensure that each school has an effective Safeguarding and Child Protection Policy, Staff Code of Conduct/Behaviour Policy and other relevant safeguarding policies and procedures, which are reviewed at least annually and updated whenever required.

Directors ensure that all members of the schools' community board members receive appropriate safeguarding and child protection (including online) training. This training will equip the members of all schools' community boards with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our schools are effective. This will support the delivery of a robust whole school

approach to safeguarding. The Directors will ensure that the training for those in governance roles will be regularly updated, at least annually, and continuously throughout the academic year.

Roles and responsibilities will include ensuring that:

- the Safeguarding and Child Protection Policy is publicly available.
- safeguarding policies and procedures reflect KCSIE 2026, Working Together to Safeguard Children 2026, relevant local safeguarding arrangements, and other statutory requirements.
- all staff, including temporary staff and volunteers, receive appropriate safeguarding information relevant to their role.
- all staff read and understand KCSIE 2026 Part One, and appropriate mechanisms are in place to support staff to understand and discharge their safeguarding responsibilities.
- staff receive safeguarding and child protection training, including online safety, at induction and that training is regularly updated, with safeguarding updates provided as required and at least annually.
- each school operates robust safer recruitment procedures and undertakes all appropriate pre-employment and suitability checks in accordance with KCSIE and relevant legislation.
- appropriate checks are undertaken for staff, supply staff, volunteers, contractors, Directors/proprietors, and others in accordance with their role and statutory requirements.
- each school maintains an accurate and compliant Single Central Record.
- appropriate procedures are in place for managing allegations and safeguarding concerns relating to staff, Principals, supply staff, volunteers, contractors, and other adults working with children.
- appropriate procedures are in place for responding to child-on-child abuse.
- referrals are made to the Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency where the relevant legal criteria are met.
- appropriate arrangements are in place for managing allegations against a Principal, including liaison with the Local Authority Designated Officer (LADO).
- a suitably senior member of staff is appointed as the Designated Safeguarding and Prevent Lead (DSPL) at each school, with appropriate Deputy DSL arrangements.
- DSPLs and deputies receive training appropriate to their roles and have sufficient time, resources, authority, and support to carry out their responsibilities effectively.
- children/learners are taught about safeguarding, including online safety, through an age-appropriate, developmentally appropriate, and accessible curriculum which takes account of SEND, communication needs, and recognised vulnerabilities.
- appropriate safeguarding responses are in place for children/learners who are absent or missing from education, home, or care.
- appropriate filtering and monitoring systems are in place, and their effectiveness is reviewed at least annually, taking account of the school's specific risks and the needs of its learners.
- responsibilities for filtering and monitoring are clearly identified and understood by relevant senior leaders, safeguarding personnel, governance, and IT support.
- appropriate arrangements are in place to identify and respond to emerging and evolving online harms.
- any weaknesses or deficiencies in safeguarding arrangements are addressed without delay; and
- safeguarding practice is regularly reviewed and reflected upon, including learning from individual cases, incidents, complaints, audits, local and national safeguarding reviews, and other relevant learning.
- Directors will seek assurance that safeguarding arrangements are effective in practice and will not rely solely upon the existence of policies, procedures, or training records. Oversight will consider children's/learners' lived experiences, safeguarding data,

patterns and trends, staff confidence, the quality of recording and decision-making, and learning from safeguarding cases and incidents.

The Principal

The Principal will support the Directors, members of the school's community board, Designated Safeguarding and Prevent Lead (DSPL), Deputy Designated Safeguarding Lead(s) (DDSLs), staff, and volunteers to fulfil their safeguarding roles and responsibilities.

The Principal has responsibility for ensuring that safeguarding arrangements are implemented effectively within the school and that safeguarding is embedded within the school's culture, leadership, and day-to-day practice.

Roles and responsibilities will include:

- ensuring that the Safeguarding and Child Protection Policy and associated safeguarding procedures are effectively implemented, understood, and followed by all staff.
- ensuring that the DSPL and Deputy DSL(s) have sufficient status and authority, time, training, funding, resources, and support, including appropriate cover arrangements, to fulfil their safeguarding responsibilities effectively.
- supporting and promoting an open and positive safeguarding culture where safeguarding is recognised as everyone's responsibility, concerns can be raised without fear and appropriate professional challenge is encouraged.
- ensuring that children's/learners' wishes, feelings and lived experiences are heard and considered when determining what action to take and what services or support should be provided.
- ensuring there are accessible and developmentally appropriate systems through which children/learners can express their views, communicate worries, and provide feedback, recognising that some learners may communicate non-verbally, through behaviour or through alternative and augmentative communication.
- ensuring safeguarding systems and methods of reporting concerns are accessible to children/learners with SEND and take account of individual communication needs.
- ensuring staff understand how to raise concerns about the conduct or behaviour of adults working with children, including allegations and low-level concerns, and that these are managed in accordance with KCSIE and the school's procedures.
- liaising with the Local Authority Designated Officer (LADO) where appropriate in relation to allegations concerning staff and other adults working with children.
- ensuring referrals are made to the Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency where the relevant criteria are met.
- ensuring that children/learners are provided with appropriate opportunities throughout the curriculum and wider school experience to learn about safeguarding, including relationships, consent and boundaries, child-on-child abuse, online safety, and emerging risks.
- ensuring safeguarding education is appropriate to children's/learners' age, developmental stage, SEND, vulnerability, and communication needs.
- ensuring appropriate arrangements are in place to respond to children who are absent or missing from education and that patterns of absence are considered from a safeguarding perspective.
- ensuring safeguarding concerns, incidents and patterns are appropriately reviewed so that learning informs practice, policy, training, and support.
- ensuring the school works effectively with parents/carers, other education settings, and relevant agencies and that appropriate safeguarding information is shared in a timely and proportionate way; and
- ensuring that safeguarding arrangements are effective in practice, and that identified weaknesses or deficiencies are addressed without delay.
- recognising behaviour and communication differences for SEND children.

Designated Safeguarding and Prevent Lead (DSPL)

The Designated Safeguarding and Prevent Lead (DSPL) is a member of the senior leadership team and takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. The role and responsibilities of the DSPL are explicit within the role holder's job description.

The DSPL will be given sufficient time, funding, training, resources, status, and authority to carry out the role effectively and to provide advice and support to other staff on child welfare, safeguarding and child protection matters.

The DSPL will:

- be available during school hours for staff to discuss safeguarding concerns. Where the DSPL is unavailable, an appropriately trained Deputy DSL will be available.
- manage and support referrals to Children's Social Care, the Channel programme, police and other relevant agencies and professional partners.
- support referrals to the Disclosure and Barring Service and Teaching Regulation Agency where appropriate.
- act as a key point of contact with safeguarding partners and other agencies and understand local safeguarding arrangements, referral pathways, and thresholds.
- provide support, advice, and guidance to staff about safeguarding and child protection concerns.
- promote appropriate and supportive engagement with parents/carers, recognising circumstances where informing or involving a parent/carer may place a child or another person at increased risk of harm or prejudice an investigation.
- work closely with the Principal, senior leadership team, Company Strategic Safeguarding Lead, Directors, relevant governance arrangements, and other appropriate personnel.
- attend, or ensure appropriate representation at, child protection, Child in Need, Team Around the Child/Person, looked-after child, and other relevant multi-agency meetings.
- contribute effectively to multi-agency assessments, plans and reviews and ensure agreed actions for the school are understood and completed.
- understand the importance of information sharing and ensure relevant safeguarding information is shared lawfully, appropriately, securely and in a timely manner.
- maintain, manage, and securely store safeguarding and child protection records.
- ensure safeguarding records are clear, comprehensive and include concerns, discussions, decisions made, reasons for those decisions, actions taken and outcomes.
- ensure safeguarding information is appropriately obtained and considered when children/learners join the school and securely transferred when they leave, in accordance with statutory guidance and the school's procedures.
- know which children/learners have a social worker, are subject to statutory or multi-agency plans, are looked after or previously looked after, and understand how these circumstances may affect their safeguarding, wellbeing, and educational outcomes.
- maintain an understanding of the safeguarding vulnerabilities and communication needs of Melrose learners, including children with SEND.
- promote the educational outcomes of children who have or have had a social worker by sharing relevant information with appropriate staff and supporting understanding of how adversity and trauma may affect attendance, engagement, behaviour, mental health, and learning.
- raise awareness and understanding of safeguarding and child protection across the school.
- ensure the school's Safeguarding and Child Protection Policy is known, understood, and used appropriately.
- ensure the policy is reviewed at least annually and that procedures and implementation are updated and reviewed regularly.

- support safeguarding training and ensure staff receive appropriate safeguarding information and updates.
- undertake appropriate DSPL training and update knowledge and skills at least annually, including through relevant updates, networks, professional development, and engagement with local safeguarding arrangements.
- understand and analyse safeguarding data, patterns, and trends to inform practice, intervention, training, and strategic safeguarding priorities.
- encourage a culture of professional curiosity, appropriate challenge, and escalation where safeguarding concerns remain unresolved.
- understand relevant local and national safeguarding learning, including learning from Child Safeguarding Practice Reviews, and consider its implications for school practice; and
- support and advise staff in recognising and responding to emerging and evolving safeguarding risks.

Online Safety, Filtering and Monitoring

The DSPL will take lead responsibility for safeguarding and online safety and will work closely with the Principal, senior leaders, governance, and IT support/provider to ensure appropriate filtering and monitoring arrangements are in place.

This will include:

- understanding the filtering and monitoring systems and processes in place within the school.
- ensuring safeguarding concerns identified through filtering and monitoring are appropriately reviewed, responded to, and recorded.
- checking relevant filtering and monitoring reports.
- working with senior leaders and IT support/providers to identify risks and review the effectiveness of filtering and monitoring arrangements.
- ensuring staff understand their responsibilities for filtering and monitoring and know how to report concerns.
- providing safeguarding assurance to leadership and governance about the effectiveness of filtering and monitoring arrangements.
- ensuring reviews take account of the school's learner profile, including SEND and individual vulnerabilities.
- considering risks arising from school-managed devices used on and off site, mobile and app-based technologies, and emerging technologies, including artificial intelligence; and
- ensuring identified safeguarding concerns or weaknesses result in appropriate action.

The DfE's Filtering and Monitoring Core Standard was updated on 24 June 2026 and now expressly includes AI-generated content and mobile/app technologies. It makes an important distinction that the Principal and SLT have responsibility for the provision overall and the DSPL will lead on safeguarding matters arising from it making information technology a technical responsibility.

The Deputy Designated Safeguarding Lead(s) (DDSL)

- Deputy Designated Safeguarding Leads will be trained to the same standard as the DSPL and will be provided with sufficient time, resources, support, and authority to undertake the responsibilities delegated to them.
- In the absence of the DSPL, an appropriately trained Deputy DSL will be available to ensure the ongoing safety and protection of children/learners.
- The activities of the DSPL may be delegated to appropriately trained deputies. However, ultimate lead responsibility for safeguarding and child protection remains with the DSPL and will not be delegated.

- Where the DSPL is absent for an extended period, clear arrangements will be established to ensure effective safeguarding leadership and oversight throughout that absence.

All Staff

- maintain an attitude of 'it could happen here' where safeguarding is concerned and remain professionally curious about children's experiences and circumstances.
- understand that safeguarding is everyone's responsibility and maintain a child-centred approach.
- identify concerns early, provide appropriate help and support and act to prevent concerns from escalating.
- act immediately on safeguarding concerns and follow the school's safeguarding and child protection procedures.
- provide a safe, inclusive, and supportive environment in which children/learners feel able to communicate worries or concerns.
- understand what to do if a child/learner tells them, or otherwise communicates, that they are experiencing abuse, neglect, exploitation, or other harm.
- recognise that children may communicate concerns verbally, non-verbally, through behaviour or through alternative forms of communication.
- listen to children, take concerns seriously and reassure them that they will be supported and kept safe.
- recognise barriers that may prevent children/learners from communicating concerns, including those associated with SEND, communication needs, fear, shame, coercion, discrimination, or previous experiences.
- understand which children may benefit from early help or other support and their role in contributing to assessments and support plans.
- record and report safeguarding concerns promptly and accurately in accordance with school procedures.
- understand that data protection is not a barrier to sharing information where this is necessary to safeguard a child.
- understand local referral arrangements and work appropriately with Children's Social Care, police, health, and other agencies.
- support social workers and other professionals following referrals and contribute appropriately to multi-agency plans.
- understand the safeguarding systems within the school, including relevant policies and procedures, the Staff Code of Conduct, arrangements for children absent from education, online safety, filtering and monitoring, allegations, and low-level concerns.
- receive safeguarding and child protection training, including online safety, at induction and appropriate updates thereafter.
- recognise that absence from education can be an important safeguarding warning sign and may be associated with abuse, neglect, exploitation, or other harm.
- understand the additional safeguarding vulnerabilities and communication barriers that may affect children/learners with SEND; and
- know how to raise concerns about the conduct of another adult, including low-level concerns, allegations, and concerns about unsafe safeguarding practice.

All staff must read and understand Part One of Keeping Children Safe in Education 2026 and follow the school's safeguarding policies and procedures.

In addition to the statutory requirement to read Part One, Melrose Education requires relevant staff to read Part Five of KCSIE.

Confidentiality and Information Sharing

Our schools recognise that effective safeguarding requires timely and appropriate information sharing. To meet children's/learners' needs, safeguard their welfare and protect them from harm, schools will work collaboratively and share relevant information with other professionals

and agencies in accordance with Working Together to Safeguard Children 2026, Keeping Children Safe in Education 2026, data protection legislation, and relevant statutory information-sharing requirements.

- All staff have a professional responsibility to share information where this is necessary to safeguard and promote the welfare of children. Staff should not assume that someone else will share information that may be critical to keeping a child safe.
- The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for safeguarding purposes. They provide a framework within which personal information must be shared lawfully, fairly, appropriately, and securely.
- Consent is not always required to share information for safeguarding purposes. Where there is a lawful basis for sharing information to safeguard and promote the welfare of a child, information may be shared without consent. Wherever it is safe and appropriate to do so, schools will be transparent with children/learners and parents/carers about how and why information is shared.
- Staff must never promise a child/learner that information relating to a safeguarding concern will be kept secret. Staff should explain, in an age and developmentally appropriate way, that information may need to be shared with people who can help keep them or others safe.
- Safeguarding and child protection information is confidential and will only be shared with those who need the information in order to safeguard and promote the welfare of the child, fulfil their professional responsibilities, or undertake another relevant safeguarding function.
- Decisions about sharing information should be necessary, proportionate, relevant, adequate, accurate, timely and secure, and the safety and welfare of the child will remain the primary consideration.
- Where there are safeguarding concerns, the school will ordinarily seek to work openly and collaboratively with parents/carers. However, information may be shared without first seeking consent or informing parents/carers where doing so could place a child or another person at increased risk of harm, prejudice the prevention or detection of crime or an investigation, or cause unnecessary delay in protecting a child.
- Where staff are uncertain about whether information should be shared, they should seek advice from the DSPL/DDSL. Uncertainty about information sharing must not result in necessary safeguarding information being withheld or action being delayed.
- Relevant safeguarding information will be shared appropriately with other schools/settings and professionals when a child/learner moves between provisions to support continuity of safeguarding, support, and risk management.
- Safeguarding and child protection records will be kept confidential, secure, and separate from the main learner record, with access appropriately controlled.
- Information-sharing decisions, including the reasons for deciding to share or not to share significant safeguarding information, should be appropriately recorded.
- Safeguarding records will be retained, archived, and disposed of securely in accordance with relevant and current statutory requirements, data protection legislation, and the school's records retention arrangements.

Recognising and Responding to Safeguarding Concerns

Recognising Concerns

Any child, in any family, in any school, may experience abuse, neglect, exploitation or other harm. Staff must maintain an attitude of **"it could happen here,"** remain professionally curious and be prepared to **"think the unthinkable."**

Safeguarding concerns are often complex and rarely occur as isolated events. Children may experience multiple and overlapping forms of harm, both within and outside the home and online. Staff should consider the whole child, their circumstances, relationships, lived experience and any changes in their presentation, behaviour, attendance, or engagement.

Staff must be alert to the possibility that indicators of abuse, neglect or exploitation may be incorrectly attributed to a child's SEND, disability, behaviour, or communication needs. Concerns must be considered with professional curiosity and not explained away solely by a child's diagnosis or additional needs.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include non-physical ill-treatment and the impact of seeing, hearing, or experiencing the effects of the ill-treatment of others, including domestic abuse. Children may experience abuse within their family, in institutional or extra-familial contexts, online, or through a combination of these. Abuse may be perpetrated by adults or by other children.

Harm outside the home may include, but is not limited to, child sexual exploitation, child criminal exploitation, serious violence, trafficking, radicalisation, harmful peer relationships, and other forms of extra-familial harm. Technology may facilitate abuse and exploitation, or the harm may occur wholly online.

Staff should be alert to behaviours and circumstances that may indicate or increase vulnerability to harm, including substance and alcohol misuse, absence from education, involvement in criminal activity, serious violence, harmful online activity and the consensual or non-consensual sharing of intimate images, including images created or manipulated using artificial intelligence.

Further information about the four main categories of abuse physical abuse, emotional abuse, sexual abuse, and neglect together with indicators of abuse, neglect and exploitation, can be found in the appendices to this policy and in Part One and Annex A of Keeping Children Safe in Education 2026.

Specific Safeguarding Issues

Staff should have an awareness of safeguarding issues that may affect children/learners. These include, but are not limited to:

- children who are absent or missing from education, home, or care.
- child sexual exploitation (CSE).
- child criminal exploitation (CCE).
- trafficking and modern slavery.
- county lines and other forms of criminal exploitation.
- serious violence, including violence involving weapons.
- bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- child-on-child abuse.
- abuse in intimate personal relationships between children.
- sexual violence and sexual harassment.
- consensual and non-consensual sharing of intimate images and/or videos, including AI-generated or manipulated images/deepfakes.
- upskirting.
- online abuse, grooming, and exploitation.
- harmful online content, communities, and influences.
- domestic abuse, including controlling and coercive behaviour.
- parental or family substance and alcohol misuse.
- fabricated or induced illness.
- so-called 'honour'-based abuse, including female genital mutilation (FGM) and forced marriage.
- abuse related to faith or belief.
- radicalisation and extremism.
- gangs and serious youth violence.
- misogyny and harmful attitudes towards women and girls.

- mental health concerns where these may be an indicator that a child has experienced or is at risk of experiencing abuse, neglect, or exploitation.
- self-harm and suicidal ideation.
- children with a parent or family member in prison.
- bereavement, trauma, and adverse childhood experiences.
- exploitation or harm associated with drugs, alcohol, vaping, or other substances; and
- other emerging safeguarding risks relevant to the child/learner, school, or local community.

This list is not exhaustive.

Professional Curiosity

There will be occasions when staff are concerned about a child/learner but do not have clear evidence of abuse, neglect, or exploitation. A child's behaviour, communication, appearance, attendance, engagement, relationships, artwork, or written work may change or cause concern. Staff may also notice physical signs, changes in emotional presentation or information which, when considered alongside other information, contributes to a wider safeguarding picture.

Staff should not wait for proof before reporting a safeguarding concern.

There may be many explanations for changes in a child's behaviour or presentation, including changes within the family, bereavement, illness, relationship difficulties, trauma, or other significant life events. However, such changes may also indicate that a child requires help, support, or protection.

Staff should respond with professional curiosity and provide children/learners with appropriate opportunities to communicate. It is appropriate to ask open and non-leading questions, for example, "Are you OK?", "I've noticed you seem upset today; is there anything you would like to tell me?" or "Is there anything I can do to help?"

Staff should listen, take the child seriously and avoid investigating or asking leading questions. Any concern should be recorded and reported promptly in accordance with the school's safeguarding procedures. Staff should act immediately on concerns and not delay.

Further information on specific safeguarding concerns and the school's response can be found within the appendices to this policy.

Responding to Safeguarding Concerns

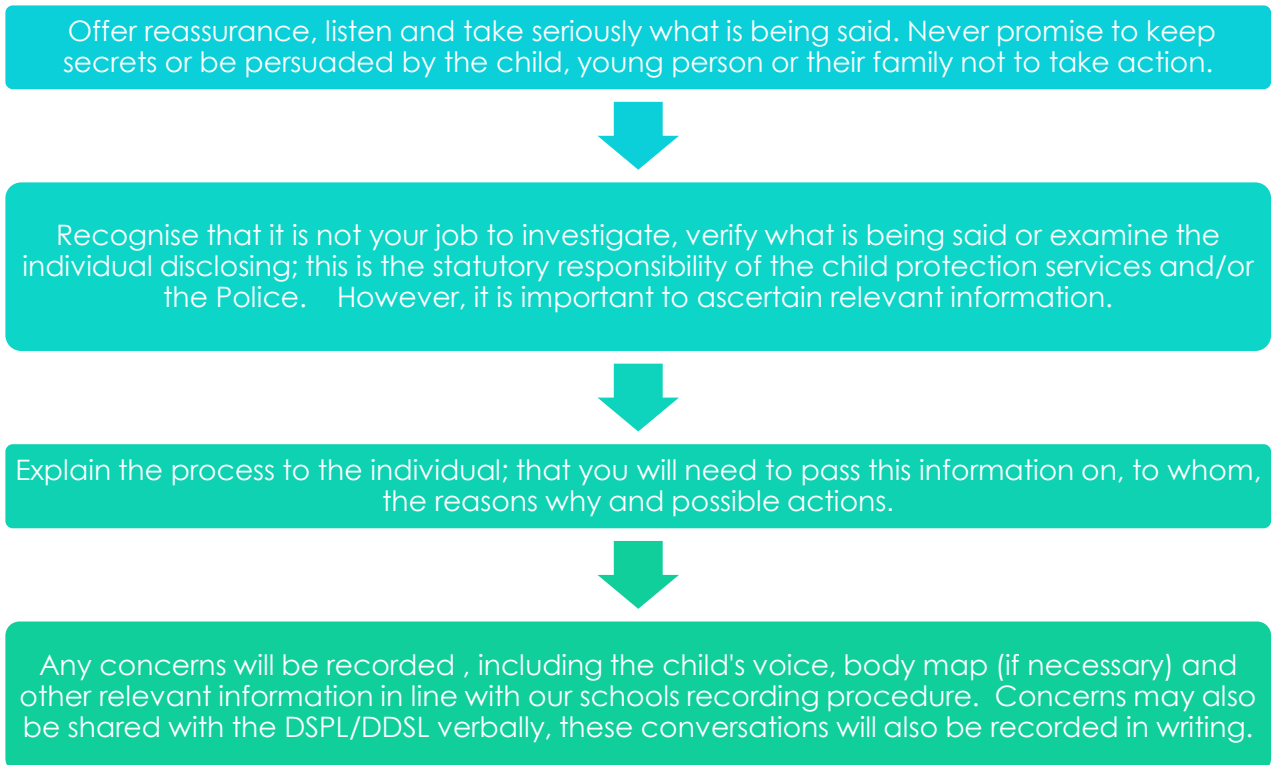
- Any safeguarding concern about a child/learner must be acted upon promptly, recorded and shared with the DSPL/DDSL in accordance with the school's safeguarding procedures and **FLOW CHART A**.
- Staff should not investigate safeguarding concerns themselves or delay reporting while seeking further information or evidence.
- Where a child/learner communicates a concern or makes a disclosure, staff should listen carefully, take them seriously, reassure them that they have done the right thing by speaking, and explain that information will need to be shared with those who can help keep them safe.
- Staff should use open and non-leading questions only where necessary to clarify what the child is communicating and should not ask the child to repeatedly recount their experience.
- Safeguarding records should include:
 - a clear and comprehensive summary of the concern.
 - the child's/learner's own words wherever relevant and possible.
 - relevant observations or contextual information.

- who recorded the concern and the date and time it was recorded.
- details of how the concern was followed up.
- decisions made and the rationale for those decisions.
- action taken; and
- the outcome, where known.
- Records must be stored confidentially and securely within the school's agreed safeguarding recording system, for example CPOMS, with access restricted appropriately.
- Where a child/learner indicates that they are experiencing, or may be at risk of experiencing, abuse, neglect, exploitation or other harm, staff must follow **FLOW CHART A** and the guidance relating to a child/learner raising a concern.
- All safeguarding concerns must be recorded and shared in accordance with school procedures. Information which appears minor in isolation may form part of a wider pattern and contribute to understanding the child's/learner's lived experience and level of risk.
- If a member of staff believes that appropriate action has not been taken following a safeguarding concern, they should raise or escalate the concern in accordance with school procedures. Staff should not assume that reporting a concern means their safeguarding responsibility has ended.
- Where a child is in immediate danger or at risk of immediate harm, appropriate emergency action must be taken without delay.

Appendix 1. Categories of Abuse
Appendix 2. Anti-Bullying / Cyberbullying
Appendix 3. Racist Incidents
Appendix 4. Radicalisation and Extremism
Appendix 5. Domestic Abuse (including Operation Encompass)
Appendix 6. Exploitation (including CSE, CCE and County Lines)
Appendix 7. Female Genital Mutilation
Appendix 8. Forced Marriage
Appendix 9. Honour Based Abuse
Appendix 10. One Chance Rule
Appendix 11. Mental Health Difficulties
Appendix 12. Private Fostering Arrangements
Appendix 13. Looked After Children and Previously Looked After Children
Appendix 14. Children Missing Education, Home, and Care
Appendix 15. Child-on-Child Abuse (including Sexual Violence, Sexual Harassment and HSB)
Appendix 16. Online Safety
Appendix 17. Youth Produced Sexual Imagery (Sexting)
Appendix 18. Additional Resources

FLOW CHART A

Where a child/learner communicates non-verbally or uses alternative or augmentative communication, the record should accurately describe what was observed or communicated and how, avoiding interpretation or assumption wherever possible.



If a Child/Learner Raises or Communicates a Concern to a Member of Staff

We recognise that it can take considerable courage for a child/learner to communicate that they are experiencing abuse, neglect, exploitation, or other harm. They may feel frightened, ashamed, guilty, or confused. They may have been threatened, coerced, or groomed. They may fear the consequences of telling someone or they may believe that what has happened is their fault. Some children may not recognise that what they are experiencing is abusive or harmful.

Children/learners may communicate concerns in many different ways. A disclosure may be verbal, non-verbal, behavioural, written, communicated through play or artwork, or made using alternative or augmentative communication. Staff must be particularly alert to barriers to communication for children/learners with SEND and must not assume that an absence of verbal disclosure means an absence of harm.

A child/learner may subsequently need to provide information to Children's Social Care, police, or other professionals. It is therefore important that their first experience of communicating a concern to a trusted adult is calm, supportive, and respectful and that staff do not unnecessarily question or investigate.

During a Conversation or Communication with the Child/Learner, Staff will:

- listen carefully and allow the child/learner to communicate at their own pace.
- remain calm and avoid appearing shocked, angry, or disbelieving.

- take what the child/learner is communicating seriously.
- acknowledge how difficult it may have been for them to communicate the concern.
- reassure the child/learner that they have done the right thing by telling or communicating with someone.
- reassure them, where appropriate, that the abuse or harm is not their fault.
- allow silence and give the child/learner sufficient time to communicate.
- use open, non-leading prompts only where clarification is necessary, such as TED – Tell, Explain, Describe.
- avoid repeatedly questioning the child or asking them to provide unnecessary detail.
- avoid speculation, interpretation, assumptions, or making accusations.
- not automatically initiate physical contact as reassurance, recognising that touch may be uncomfortable or distressing for some children.
- never criticise or question why the child/learner did not communicate the concern sooner.
- not promise confidentiality or secrecy.
- explain, in a way the child/learner can understand, that information will need to be shared with people who can help keep them safe.
- explain, where possible, what will happen next; and
- record and report the concern promptly in accordance with the school's safeguarding procedures.

Where a child/learner communicates non-verbally or uses alternative or augmentative communication, staff should accurately record what was communicated, observed, or demonstrated and how, distinguishing fact and observation from professional interpretation.

Notifying and Working with Parents/Carers

The school will normally seek to work openly and collaboratively with parents/carers and, where appropriate, discuss safeguarding concerns relating to their child with them. Such conversations will be handled sensitively and will normally be undertaken or coordinated by the DSPL/DDSL.

However, parents/carers will not automatically be informed before safeguarding information is shared, advice is sought or a referral is made.

The DSPL/DDSL will consider whether informing or involving a parent/carer could:

- place the child/learner or another person at increased risk of harm.
- place the child at risk of intimidation, coercion, punishment, or further abuse.
- prejudice a police officer, Children's Social Care, or other safeguarding investigation.
- lead to evidence being lost, destroyed, or concealed.
- increase the likelihood of a child being removed from the area or country.
- create additional risk in cases involving domestic abuse, sexual abuse, exploitation, trafficking, forced marriage, female genital mutilation, or so-called 'honour'-based abuse; or
- otherwise undermine action being taken to safeguard the child.

Where there is uncertainty about whether parents/carers should be informed, the DSPL/DDSL should seek advice from Children's Social Care, police, or another appropriate safeguarding agency before contacting the parent/carer.

Where it is safe and appropriate to involve parents/carers, the school will seek to work in partnership with them, explain concerns and proposed actions clearly and support their participation in safeguarding arrangements.

Making a Referral

Safeguarding concerns about a child/learner should be reported immediately to the DSPL/DDSL in accordance with the school's safeguarding procedures. The DSPL/DDSL will consider the information available, the child's lived experience, relevant local threshold guidance and whether further support, advice, assessment, or referral is required.

- Where appropriate, the DSPL/DDSL will seek advice from Children's Social Care or other relevant safeguarding professionals. The school will consider whether the child and family require help and support as soon as problems emerge, targeted or multi-agency support, or statutory intervention.
- Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral to Children's Social Care should be made immediately.
- Referrals should be made promptly using the relevant local authority referral arrangements. The school will ensure that appropriate systems are in place to enable urgent referrals to be made without unnecessary delay.
- Anyone can make a referral. Staff do not require the permission of the DSPL to contact Children's Social Care or the police where they believe this is necessary to safeguard a child. Where a member of staff believes a referral should be made and one has not been made, they should consider making the referral themselves.
- Where a referral is made by someone other than the DSPL/DDSL, the DSPL should be informed as soon as practicable, unless doing so would be inappropriate because the concern relates to the DSPL or there is another reason why informing them could compromise safeguarding action.
- Children/learners should be involved in decisions affecting them in a way that is appropriate to their age, developmental stage, and communication needs. Parents/carers will normally be informed and involved where it is safe and appropriate to do so. They will not be informed before advice is sought or a referral is made where doing so could increase risk to the child or another person, prejudice an investigation, lead to evidence being lost or otherwise undermine safeguarding action.
- Where there is uncertainty about whether parents/carers should be informed, advice should be sought from Children's Social Care, police, or another appropriate safeguarding agency before contacting them.
- Following a referral, the DSPL/DDSL or person making the referral should follow up where necessary and ensure that the outcome is understood and recorded.
- If the child's circumstances do not appear to be improving, concerns remain unresolved or the school's concerns have not been adequately addressed, the DSPL/DDSL or person who made the referral should challenge and escalate the matter in accordance with local safeguarding partnership escalation procedures.
- Professional disagreement must not result in delay where a child may remain at risk.
- If the allegation is against the DSPL the Directors should be informed immediately and correct procedures followed.
- If a child/learner is in immediate danger or at risk of immediate harm, a referral must be made to Children's Social Care and/or the police immediately. Anybody can make a referral.
- All referrals, discussions, decisions, reasons for decisions, actions and outcomes should be clearly recorded within the child's safeguarding record.

Supporting our Staff

We recognise that safeguarding work can have an emotional impact on staff. Supporting a child/learner who has experienced, or may be at risk of experiencing, abuse, neglect, exploitation, trauma, or other harm can be distressing and may affect staff personally and professionally.

The school will provide staff with opportunities to discuss the impact of safeguarding work with the DSPL/DDSL or another appropriate senior member of staff and ensure appropriate safeguarding supervision, support and reflective opportunities are available, proportionate to staff members' roles and responsibilities.

We recognise the potential impact of repeated exposure to distressing information, disclosures, and safeguarding incidents, including vicarious trauma and provide additional support following particularly distressing or traumatic safeguarding incidents where required.

We signpost staff to appropriate internal or external wellbeing and support services and promote a culture in which seeking support is recognised as an appropriate part of safe professional practice. We also offer external, private, and independent supervision for those working in a safeguarding role.

Safeguarding supervision and support must maintain appropriate confidentiality.

Children/Learners Who May Be Particularly Vulnerable

Our schools recognise that any child can experience abuse, neglect, exploitation, or other harm, but that some children/learners may face additional vulnerabilities or barriers to being recognised, heard, understood, or protected.

In some cases, indicators of abuse such as a child/learner's mood, behaviour or injury might be assumed to relate to the child/learner's impairment or disability rather than giving a cause for concern. Or a focus may be on the child/learner's disability, special educational needs, or situation without consideration of the full picture. In other cases, such as bullying, the child/learner may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children/learners may also find it harder to raise concerns about abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

A focus on a child's SEND, behaviour or communication needs must not prevent staff from considering the whole safeguarding picture.

Staff should remain professionally curious and ensure that safeguarding responses and opportunities to communicate are accessible and appropriate to each child's developmental and communication needs.

Any child/learner may benefit from early help or may need to feel comfortable and safe to speak out. All school staff should be particularly alert to the potential need for early help, for a child/learner who:

- is disabled or has additional needs.
- has special educational needs, whether or not they have an Education, Health, and Care Plan (EHCP).
- is a young carer.
- is experiencing family circumstances such as domestic abuse, parental mental ill-health, or parental substance/alcohol misuse.
- has experienced abuse, neglect, exploitation, trauma, or other adverse experiences.
- is showing signs of being drawn into antisocial or criminal behaviour, including gangs, organised crime, or serious violence.
- is experiencing or at risk of child criminal exploitation or child sexual exploitation.
- is at risk of modern slavery or trafficking.
- is frequently or persistently absent from education, including for part of the school day, or goes missing from home or care.
- is misusing alcohol, drugs, or other substances.
- has returned home to their family from care.
- is looked after or previously looked after.
- has a parent/carers or close family member in prison.
- is privately fostered.

- is experiencing homelessness, insecure housing, or significant family instability.
- is experiencing mental health or emotional wellbeing difficulties.
- is at risk of self-harm or suicide.
- is at risk of radicalisation or extremist influence.
- is at risk of forced marriage, female genital mutilation, or other forms of so-called 'honour'-based abuse.
- is lesbian, gay, bisexual or gender questioning, or is perceived by others to be, and may consequently experience bullying, abuse, or discrimination.
- is experiencing prejudice-based or discriminatory bullying.
- has experienced significant bereavement or loss; or
- has other circumstances which may increase their vulnerability or create barriers to accessing help and protection.

This list is not exhaustive. Staff should consider each child's individual circumstances, lived experience, strengths, needs, and relationships rather than relying on vulnerability categories alone.

Whistleblowing

We recognise that children/learners cannot be expected to raise concerns in an environment where adults do not feel able to raise concerns about unsafe or inappropriate practice.

All staff have a responsibility to raise concerns about poor or unsafe safeguarding practice, wrongdoing, or potential failures in the school's safeguarding arrangements. This may include concerns about the conduct, attitudes or actions of colleagues, failures to follow safeguarding procedures, concerns that safeguarding matters are not being responded to appropriately, or circumstances where the actions or decisions of the school may place children/learners at risk.

Staff should raise concerns in accordance with the school's Whistleblowing Policy and should feel able to do so without fear of inappropriate repercussions.

Where a member of staff has concerns about safeguarding practice, they should normally raise these through the school's internal safeguarding or whistleblowing arrangements. Where they feel unable to raise a concern internally, believe their concern has not been appropriately addressed, or consider that internal reporting would not be appropriate, they may seek independent advice or raise the concern externally.

KCSIE 2026 specifically identifies the NSPCC Whistleblowing Advice Line as an external route for staff who feel unable to raise safeguarding concerns internally.

NSPCC Whistleblowing Advice Line

Telephone: **0800 028 0285**

Email: **help@nspcc.org.uk**

[NSPCC Whistleblowing Advice Line](#)

The service can be contacted anonymously. The telephone line is currently staffed 365 days a year: Monday to Friday, including bank holidays, 8.00 a.m. – 8.00 p.m.; weekends 9.00 a.m. – 5.00 p.m.

Concerns relating to the Principal should be raised with the Company Strategic Safeguarding Lead, or Deputy Strategic Safeguarding and Prevent Lead, in accordance with the company's safeguarding and whistleblowing procedures. Contact details are available to staff through the safeguarding documentation, safeguarding posters, and the listening button on SharePoint.

Where a concern relates to the Company Strategic Safeguarding Lead, or where the usual reporting route would otherwise be inappropriate, staff should follow the alternative escalation arrangements set out within the Whistleblowing Policy.

Allegations Against Staff, Supply Staff, Volunteers and Contractors, including Low-Level Concerns

Melrose Education and its schools are committed to promoting an open and transparent safeguarding culture in which concerns about adults working with children are identified, shared, and responded to appropriately.

All staff, supply staff, contractors, and volunteers are expected to maintain appropriate professional boundaries and follow the Staff Code of Conduct and relevant safe working practice guidance. Safeguarding expectations, including appropriate use of mobile phones, devices, social media and other technology, will be addressed through induction and ongoing training.

Concerns about adults will be considered in accordance with Part Four of Keeping Children Safe in Education 2026, relevant Local Authority Designated Officer (LADO) procedures and Melrose policies.

Concerns or Allegations that may Meet the Harm Threshold

An allegation may meet the harm threshold where a person working with children 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 they 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.

This includes behaviour that may have occurred inside or outside the school or workplace.

Concerns or allegations which may meet the harm threshold must be reported to the LADO without delay in accordance with the school's allegations procedures.

The school will follow KCSIE Part Four and relevant local LADO procedures. The LADO will be consulted where appropriate and the school will work collaboratively with the LADO, Children's Social Care, police, HR, and other relevant agencies.

The LADO provides oversight, advice, and co-ordination within the allegations management process, but employment/disciplinary decisions remain matters for the employer, informed by LADO, police, and Children's Social Care involvement where relevant. KCSIE expressly discusses the LADO and case manager considering what further action, including disciplinary action, may be appropriate.

The school will ensure that safeguarding the child remains the primary consideration while also providing appropriate support to the person who is the subject of the allegation and maintaining confidentiality in accordance with statutory guidance.

Suspension will not be an automatic response where an allegation is made against a member of staff. Any decision to suspend will be considered carefully, taking account of the circumstances of the case, the welfare of the child/learner and whether alternative arrangements could appropriately manage any identified risk. The Principal/case manager will seek appropriate advice, including from the LADO and the Company Strategic Safeguarding Lead where relevant, before reaching a decision.

The school will maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Staff, parents/carers, Directors, and others will be reminded of the legal restrictions on publishing material that may identify a teacher who is the subject of an allegation of a criminal offence against a learner until the relevant restrictions cease to apply. Publication includes speech, writing and communication by electronic means, including social media.

Where an allegation is investigated, the outcome will be recorded using the terminology set out within KCSIE:

- **Substantiated** – there is sufficient evidence to prove the allegation.
- **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation.
- **False** – there is sufficient evidence to disprove the allegation.
- **Unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation; this does not imply guilt or innocence; or
- **Unfounded** – there is no evidence or proper basis which supports the allegation being made.

Appropriate action following an allegation will depend upon the circumstances and outcome of the case and may include safeguarding action, disciplinary action, dismissal, or removal from regulated activity and, where the relevant criteria are met, referral to the Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA).

Low-Level Concerns

The term low-level concern does not mean that the concern is insignificant. A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold or is otherwise not considered sufficiently serious to refer to the LADO.

Examples may include, but are not limited to, being over-friendly with children, having favourites, taking photographs of children on a personal device contrary to school policy, 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 humiliating language.

All low-level concerns should be shared, recorded, and responded to appropriately in accordance with the school's procedures.

Staff are encouraged to self-refer where they believe they may have acted in a way that could be misinterpreted, may have fallen below expected professional standards, or where they wish to be transparent about an incident.

Records of low-level concerns will be reviewed to identify potential patterns of concerning, problematic or inappropriate behaviour, and to identify any wider weaknesses in the school's safeguarding culture, systems, training, or Staff Code of Conduct.

Low-level concerns will be responded to in a timely, proportionate, and sensitive manner. The Principal, or other designated person in accordance with Melrose procedures, will consider the information available and determine appropriate next steps. This may include speaking with the person who raised the concern, the individual concerned and any witnesses, where appropriate.

The information gathered will be considered against the Staff Code of Conduct and relevant safeguarding procedures. Where there is uncertainty about whether a concern meets the harm threshold, advice should be sought from the LADO.

Appropriate action may include clarification of expected practice, additional training, support, supervision, management advice, or action under relevant employment procedures. Concerns will be recorded and reviewed to identify patterns of behaviour or wider safeguarding or cultural issues.

Reporting Routes

Concerns about a member of staff, supply staff, volunteer, or contractor should be reported in accordance with the school's allegations and low-level concerns procedures.

Concerns about the Principal should be reported to the designated alternative person identified within Melrose procedures.

Concerns about the DSPL should be reported to the Principal or other designated senior person. Where concerns relate to poor or unsafe safeguarding practice or wider organisational safeguarding failures, staff should follow the school's Whistleblowing Policy.



Record Keeping – Low-Level Concerns

All low-level concerns will be recorded in writing.

Records will include:

- details of the concern and the context in which it arose.
- the name of the individual sharing the concern unless they wish to remain anonymous where reasonably possible.
- any action taken; and
- the rationale for decisions and actions taken.

Records will be:

- kept confidential and held securely in accordance with the Data Protection Act 2018 and UK GDPR.
- reviewed so that potential patterns of concerning, problematic, or inappropriate behaviour can be identified and consideration given to whether there are wider safeguarding, cultural or systemic issues within the school.

- reviewed where further concerns arise about the same individual, with consideration given to whether the harm threshold is now met and whether advice/referral to the LADO is required; and
- retained in accordance with the school's records retention schedule and applicable safeguarding, employment, and data protection requirements. In accordance with KCSIE, low-level concern records will be retained at least until the individual leaves employment and may be retained for longer where there is a lawful and proportionate reason to do so.

Where a low-level concern relates to a supply member of staff or contractor, the school will notify the individual's employer so that relevant information can be considered in the context of any other concerns and potential patterns of behaviour.

Low-level concerns will not be included in employment references unless they relate to matters which would normally be included in a reference, for example misconduct or poor performance. Where a low-level concern, or group of concerns, has met the harm threshold and has been found to be substantiated, it will be referred to in a reference where appropriate in accordance with KCSIE.

Restrictive Interventions, including the Use of Reasonable Force

Melrose Education recognises that the use of reasonable force and other restrictive interventions can have a significant impact on children/learners and staff. Schools will seek to minimise the need for restrictive interventions through prevention, positive relationships, understanding individual needs, de-escalation and appropriate support and planning.

Any use of reasonable force or other restrictive intervention must be lawful, necessary, proportionate to the circumstances and use no more force than is reasonably required.

Restrictive interventions include planned or reactive actions which limit a child/learner's movement, liberty, or ability to act independently. They may include physical restraint, seclusion or other restrictive practices and may or may not involve the use of force.

Staff should consider the individual needs and circumstances of the child/learner, including any SEND, disability, communication needs, trauma, medical needs, and other relevant vulnerabilities. Wherever reasonably possible, approaches to preventing and responding to distressed behaviour should be informed by the child's individual plans, risk assessments, and known needs.

Staff who may be required to use restrictive interventions will receive appropriate training and guidance relevant to their role. Training does not replace the requirement for staff to exercise professional judgement and ensure that any intervention used is lawful, necessary, and proportionate.

Following an incident, the school will consider the welfare of the child/learner and staff involved and provide appropriate opportunities for support, reflection, and review. The child's voice and experience should be considered in a way appropriate to their age, development, and communication needs.

Recording and Reporting

Schools will comply with the statutory requirements for recording and reporting significant incidents involving the use of force and incidents of seclusion.

Records will include appropriate information about the circumstances leading to the intervention, the intervention used, its duration where relevant, those involved, any injuries or other consequences, and subsequent action or review.

Parents/carers will be informed in accordance with the statutory recording and reporting requirements, subject to any applicable safeguarding considerations.

Schools will review incidents and relevant data to identify patterns, understand triggers, and consider whether changes to individual support, staffing, environment, training, or wider practice could reduce the likelihood of restrictive intervention being required in future.

The new statutory recording/reporting requirements are a particularly important addition — this isn't simply "record it and get a witness to sign it" anymore. The 2026 guidance expressly introduces statutory requirements around significant uses of force and the recording/reporting of seclusion.

Safeguarding

The use of restrictive intervention must never be used as punishment or in a way that is degrading or intended to cause pain or distress.

Where the use of force or another restrictive intervention raises a safeguarding concern including concern about whether an intervention was inappropriate, excessive, or caused harm the school's safeguarding procedures must be followed. Where the concern relates to the conduct of an adult, consideration must be given to the school's allegations and low-level concerns procedures and, where appropriate, consultation with the LADO.

Appropriate physical contact with children/learners may form part of safe and supportive practice. Staff must maintain professional boundaries and follow the school's Staff Code of Conduct, relevant individual plans, and safe working practice guidance.

Further information should be read alongside the school's Behaviour Policy and any separate policy/procedure governing restrictive interventions.

DfE – Restrictive interventions, including the use of reasonable force, in schools

Team Teach

Where Melrose schools use Team Teach as their approved approach to training staff in positive behaviour support, de-escalation and physical intervention, staff must apply that training within the requirements of this policy, individual child/learner plans, and the DfE guidance on restrictive interventions.

Safeguarding Records, Information Sharing and Transfer

Safeguarding records will be accurate, up to date, confidential and stored securely, separately from the main learner record, with access appropriately restricted.

Records will include relevant concerns, discussions, decisions, and actions taken, including the rationale for decisions and circumstances where referrals were considered, made, or not made.

The DSPL/DDSL will ensure that relevant safeguarding information is shared appropriately and securely with professionals and other education settings where this is necessary to safeguard and promote the welfare of a child/learner.

Information Sharing Before Placement or Transfer

Where a child/learner is being considered for admission or transfer to a Melrose school, the school may seek relevant safeguarding information from the child's current or previous education setting where there is a lawful basis, and the information is necessary to support safeguarding, risk assessment, transition planning, and the child's needs.

Where there are known or suspected significant safeguarding concerns, the receiving school's DSPL/DDSL should seek relevant safeguarding information and, where appropriate, have direct discussion with the current setting's DSPL before the child/learner starts. This should enable the school to understand the child's needs, identify any risk to the child or others, and ensure appropriate safeguarding, support, risk assessment, and safety-planning arrangements are in place from the outset.

Relevant safeguarding information should be shared with those staff who need it before the child/learner begins attending, where this is necessary to enable them to safeguard and support the child effectively.

Information sharing before placement should be necessary and proportionate and should not be used to unfairly disadvantage a child/learner because they have safeguarding needs or a history of involvement with Children's Social Care.

Where significant safeguarding information has been requested but has not been received, the DSPL should actively follow this up and consider whether sufficient information is available to safely plan the child's transition and commencement at the school.

Transfer of Safeguarding Records

When a child/learner leaves the school, the DSPL will ensure that their child protection/safeguarding file is transferred to the new school or college as soon as possible and within the timescale required by KCSIE, separately from the main learner file and using a secure method of transfer.

Confirmation of receipt should be obtained and retained.

In addition to transferring the safeguarding file, the DSPL should consider whether it would be appropriate to share relevant information with the new school or college in advance of the child's arrival where this would assist the receiving setting to put appropriate support in place. Where there are significant safeguarding concerns, the DSPL should consider having a direct conversation with the receiving setting's DSPL so that relevant risks, needs, and safeguarding arrangements are properly understood rather than relying solely on the transfer of written records.

Information shared will be limited to that which is necessary, relevant, adequate, accurate, timely and secure, in accordance with data protection legislation and statutory information-sharing requirements.

Records of significant information-sharing decisions, including what was shared, with whom and the rationale for the decision, will be maintained.

Policy Links

This Safeguarding and Child Protection policy also links to the following documentation and policies:

- Behaviour (Learners) including Physical Interventions
- Code of Conduct and Behaviour (Staff)
- Whistleblowing
- Anti-Bullying
- Allegations of Abuse Against Staff
- Complaints
- Attendance
- Curriculum
- PSHE
- RSE (Relations And Sex Education)
- Medications

- Online Safety
- Risk Management and Risk Assessment
- Safer Recruitment
- Data Protection and GDPR
- Health, Food and Fire Safety
- CCTV

Appendix 1 – Categories and Indicators of Abuse

Abuse is a form of maltreatment of a child. A child may be abused or neglected by someone inflicting harm or by failing to act to prevent harm. Harm may be physical or non-physical and can include the impact of seeing, hearing, or experiencing the effects of the ill-treatment of others, including domestic abuse.

Abuse can occur within the family, in institutional or extra-familial contexts, or online. It may be perpetrated by an adult or adults or by another child or children. Children may experience more than one form of abuse or harm at the same time.

The four main categories of abuse are:

- physical abuse.
- emotional abuse.
- sexual abuse; and
- neglect.

The presence of one or more indicators does not prove that abuse has occurred, and the absence of indicators does not mean that a child is safe. Staff should consider patterns, changes, context, the child's lived experience, and information held by others, remain professionally curious and report concerns in accordance with school procedures.

Possible indicators of abuse or neglect Indicators may include, but are not limited to:

- unexplained or concerning injuries.
- explanations for injuries which are inconsistent, changing or do not fit the child's age or developmental ability.
- significant changes in behaviour, mood, or presentation.
- withdrawal, fearfulness, hypervigilance, or emotional distress.
- aggression or significant dysregulation.
- changes in relationships with adults or peers.
- low self-esteem or expressions of worthlessness.
- self-harm or suicidal thoughts or behaviour.
- age or developmentally concerning sexualised behaviour or knowledge.
- changes in attendance, including repeated or prolonged absence.
- deterioration in engagement, learning, or participation.
- substance misuse or involvement in criminal activity.
- signs of exploitation.
- hunger, poor hygiene, inadequate clothing, or unmet health needs.
- developmental concerns or regression.
- a child appearing fearful of a particular adult or reluctant to go home; or
- information communicated verbally, non-verbally, through behaviour, play, artwork, writing, or alternative communication.

Indicators must always be considered in the context of the individual child, including their age, development, SEND, disability, communication needs, culture, and circumstances. These factors should inform professional understanding but must never be used to explain away a safeguarding concern.

Physical Abuse

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

Possible indicators may include:

- injuries for which there is no explanation or an explanation which is inconsistent with the injury or the child's developmental ability.
- repeated injuries or presentations for treatment.
- unexplained delay in seeking medical attention.
- concerning patterns of bruising, burns, scalds, fractures, bite marks, or other injuries.
- injuries in a non-mobile baby or child.
- different or changing explanations for an injury; or
- a child appearing fearful when asked about an injury.

Any injury which causes concern should be recorded and referred in accordance with local safeguarding procedures rather than diagnosed by school staff.

Some birthmarks and skin conditions, including congenital dermal melanocytosis may resemble bruising. Staff should record known birthmarks appropriately where this forms part of school procedures but should seek safeguarding or medical advice where there is uncertainty about an injury or mark.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child which may cause severe and adverse effects on their emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet another person's needs. It may include inappropriate expectations, preventing normal social interaction, serious bullying, causing children frequently to feel frightened or in danger, or exploitation or corruption.

Possible indicators may include:

- persistent anxiety, fearfulness, or hypervigilance.
- low self-esteem or lack of confidence.
- withdrawal or difficulties forming relationships.
- significant aggression or emotional dysregulation.
- developmental delay or regression.
- concerning attachment behaviour.
- a child being persistently blamed, humiliated, rejected, or scapegoated; or
- behaviour or emotional responses which suggest that the child's emotional needs are not being met.

Sexual Abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether the child understands what is happening or not. It may involve physical contact or non-contact activities, including involving children in sexual images, encouraging children to behave in sexually inappropriate ways, grooming, and abuse facilitated through technology.

Possible indicators may include:

- sexual behaviour, language, or knowledge that is concerning in relation to the child's age or developmental stage.
- sexualised behaviour, which is coercive, harmful, or significantly outside developmental expectations.
- sudden changes in behaviour, relationships, or emotional wellbeing.
- fear of or avoidance of a particular person.
- unexplained gifts, money, or possessions.
- sexual exploitation or grooming, including online.
- self-harm, significant anxiety, or distress.
- pregnancy or sexually transmitted infection where this raises safeguarding concerns.
- genital pain, injury, bleeding, or other concerning physical symptoms; or

- concerns involving the creation, sharing, or manipulation of intimate images.

Sexual abuse may have no observable physical signs, and children may communicate abuse indirectly or not recognise their experience as abuse.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may begin during pregnancy and can involve failure to provide adequate food, clothing, or shelter; protect a child from harm; provide appropriate supervision; ensure access to medical care or treatment; or respond to the child's basic emotional needs.

Possible indicators may include:

- persistent hunger or inadequate nutrition.
- clothing that is consistently unsuitable for conditions.
- persistent poor hygiene where this reflects unmet care needs.
- untreated medical, dental or health needs.
- inadequate supervision or inappropriate caregivers.
- repeated accidents or injuries associated with inadequate supervision.
- significant or unexplained developmental concerns.
- persistent tiredness or difficulties associated with routines and care.
- repeated or prolonged absence from education.
- a child taking on inappropriate caring responsibilities.
- emotional unavailability or lack of responsiveness from caregivers.
- unsafe or unstable living circumstances; or
- patterns of concerns which cumulatively indicate that the child's needs are not being met.

Neglect should be considered cumulatively. Individual incidents may appear minor but repeated concerns over time can significantly affect a child's health, development, and wellbeing.

Neglect can occur in families of any socioeconomic background. Poverty, housing difficulties, and financial hardship can place families under significant pressure but must not themselves be equated with neglect. Practitioners should distinguish between a parent's inability to meet a child's needs because of poverty or lack of resources and a failure to provide appropriate care, while ensuring families receive appropriate help and support.

Neglect can occur in families of any socioeconomic background. Poverty, housing difficulties, and financial hardship can place families under significant pressure but must not themselves be equated with neglect. Practitioners should distinguish between a parent's inability to meet a child's needs because of poverty or lack of resources and a failure to provide appropriate care, while ensuring families receive appropriate help and support.

Equally, staff should be aware of the potential for affluent neglect, where a child's material needs may be well met but their emotional, supervisory, or other developmental needs are not. Apparent family affluence, educational achievement, or access to material opportunities should not lead practitioners to overlook indicators that a child's needs are not being met or that they may be experiencing harm.

Appendix 2

Anti-Bullying and Cyberbullying

Melrose Education recognises that bullying can have a significant impact on a child's safety, wellbeing, mental health, sense of belonging and ability to engage with education. Bullying will not be tolerated or dismissed as an inevitable part of growing up.

Bullying may take place face-to-face or online, within or outside school, and may include physical, verbal, emotional, relational, or sexual behaviour. It may include cyberbullying and prejudice-based or discriminatory bullying relating to, for example, race, religion or belief, disability or SEND, sex, sexual orientation, gender reassignment or other actual or perceived difference.

All staff should understand that bullying, including cyberbullying, prejudice-based and discriminatory bullying, may constitute child-on-child abuse and can become a safeguarding or child protection concern. Staff should be particularly alert to children/learners who may experience increased vulnerability to bullying or barriers to reporting it, including children with SEND or disabilities and children who are perceived as different by their peers.

The school will:

- promote a culture of respect, inclusion and belonging in which bullying is challenged.
- ensure children/learners know how and to whom they can report bullying and are confident that concerns will be taken seriously.
- respond promptly and proportionately to reported or suspected bullying.
- record and monitor bullying incidents in accordance with school procedures.
- consider patterns, recurrence, locations, peer groups, and online activity rather than viewing incidents in isolation.
- consider the needs and safety of all children involved, including the child experiencing bullying and the child displaying bullying behaviour.
- work with parents/carers and relevant professionals where appropriate.
- provide appropriate support to children affected by bullying; and
- escalate concerns through safeguarding procedures where there is evidence or suspicion of significant harm, child-on-child abuse, exploitation, criminal behaviour, or another safeguarding concern.

Melrose schools consider the needs and safety of all children involved, including the child experiencing bullying and the child displaying bullying behaviour because a child displaying bullying behaviour may themselves have unmet safeguarding needs, SEND, trauma, exploitation, or difficulties with social understanding.

Where bullying is persistent, particularly serious, escalating or the school's interventions have not been effective, the Principal and DSPL/DDSL will consider whether further safeguarding assessment, support or referral is required.

Cyberbullying will be considered alongside the school's Online Safety, Behaviour and Acceptable Use arrangements. Staff should recognise that online and offline behaviour are often interconnected and that online bullying may continue beyond the school day and school premises.

Bullying and respectful relationships will be addressed through the curriculum, including PSHE and RSE, and through the school's wider work to promote positive relationships, equality, inclusion, and respectful behaviour.

The school's detailed arrangements for preventing, recording, and responding to bullying are contained within its Anti-Bullying and Behaviour policies. DfE guidance continues to expect schools to take effective action to prevent and respond to bullying.

Appendix 3

Racism, Prejudice and Discriminatory Incidents

Melrose Education is committed to providing an inclusive environment in which racism, prejudice, discrimination, harassment, and derogatory behaviour are recognised, challenged, and responded to appropriately.

Racist and other prejudice-based incidents may occur face-to-face or online and may be directed towards a child/learner because of their actual or perceived race, ethnicity, nationality, religion, culture, or other characteristic. Such behaviour may include language, gestures, harassment, bullying, exclusion, threats, abuse, or harmful online content.

All incidents will be taken seriously, recorded and responded to in accordance with the school's Equity, Diversity and Inclusion, Behaviour, Anti-Bullying and Safeguarding and Child Protection policies.

Incidents will be monitored to identify patterns, including recurrence, locations, groups of children/learners affected or responsible, and any wider issues relating to school culture. Relevant information will be used to inform preventative education, staff training, and whole-school safeguarding practice.

Incidents will be recorded and, where necessary, reported to the relevant local authority arrangements if it is causing a risk to the placement.

Appendix 4

Prevent: Radicalisation and Extremism

Under section 26 of the Counterterrorism and Security Act 2015, specified authorities, including schools, must have due regard to the need to prevent people from being drawn into terrorism. The Prevent Duty Guidance for England and Wales 2023 came into force on 31 December 2023 and should be read alongside Keeping Children Safe in Education and Working Together to Safeguard Children.

The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. Prevent forms part of the school's wider safeguarding responsibilities and seeks to ensure that people who are susceptible to radicalisation are identified and offered appropriate support.

Radicalisation is the process by which a person legitimises support for, or the use of, terrorist violence. Susceptibility to radicalisation is complex and individual. There is no single profile of a person who may become radicalised and no single pathway into terrorism.

Children/learners may encounter radicalising influences online or offline, including through peers, family or other adults, groups, social media, online communities, gaming, and other digital environments. Online environments can expose children to extremist and terrorist material and connect them with individuals or networks seeking to influence or radicalise them.

Melrose schools recognise radicalisation as a safeguarding concern and will respond through established safeguarding procedures.

Recognising Susceptibility and Risk

There is no single indicator that demonstrates that a child/learner is being radicalised. Staff should avoid assumptions or profiling based upon a child's religion, ethnicity, culture, political views, SEND, disability, appearance, or other characteristics.

Holding strong views, criticising government policy, taking an interest in political or international events, expressing religious beliefs, supporting lawful causes, or exploring identity does not in itself indicate susceptibility to radicalisation. Staff should instead consider the child's behaviour and circumstances as a whole, including changes over time and the interaction between potential influences, susceptibility, protective factors, and concerning behaviour.

Possible concerns may include:

- accessing, sharing, or promoting terrorist or extremist material.
- increasing engagement with individuals, groups or online communities promoting terrorist violence.
- expressing support for terrorism or terrorist organisations.
- justifying or glorifying terrorist violence.
- expressing an intention or desire to participate in terrorist activity.
- possessing or seeking material relating to terrorism in circumstances which raise concern.
- significant behavioural changes alongside other indicators of radicalising influence.
- increasing isolation combined with engagement with concerning extremist narratives or networks.
- fixation on extreme or mass violence where this forms part of a wider pattern of concern; or
- other behaviour suggesting that the child/learner may be being groomed, influenced, or exploited by radicalising individuals or ideologies.

Staff should recognise that susceptibility may interact with other experiences such as abuse, bullying, discrimination, social isolation, exploitation, or personal and emotional difficulties. However, these circumstances do not themselves mean that a child is susceptible to radicalisation.

Responding to Concerns

All staff should know how to recognise and report concerns about radicalisation. Concerns should be reported promptly to the DSPL/DDSL and considered in accordance with the school's safeguarding procedures.

The DSPL/DDSL will consider the concern in context and may seek advice from the Local Authority Prevent team, Prevent partners, Children's Social Care, or police as appropriate. Decisions, actions, and the rationale for them will be recorded. Where appropriate, a Prevent referral should be made. Anybody can make a Prevent referral where necessary.

Where there is an immediate risk of harm or concern that a criminal offence is about to be committed, the police should be contacted immediately. Current DfE guidance specifically says police should be contacted immediately where a learner is about to place themselves or others in immediate danger or appears to be planning a criminal offence.

Channel

Channel is a multi-agency programme providing support to people who are susceptible to radicalisation. Where appropriate, a Prevent referral may result in consideration through Channel. Support through Channel is voluntary and is intended to provide proportionate, tailored early support. Current Channel statutory guidance was revised in 2025.

Prevent Risk Assessment

The Directors, Principal and DSPL will ensure that the school understands and assesses the risk of radicalisation within its particular context. The assessment should consider relevant local and national risks, the school's learners, online risks, use of school premises and any other factors relevant to the setting.

Where risks are identified, proportionate actions will be taken to mitigate them. The assessment should be reviewed appropriately and when circumstances or risks change. DfE guidance makes clear that no setting is risk free and that the nature of the risk can change quickly. Staff will receive appropriate Prevent training. Those with specific Prevent responsibilities, including DSPLs/DDSLs, will maintain the additional knowledge and skills necessary to advise and support other staff and respond appropriately to concerns.

Curriculum and Safeguarding Culture

Schools will provide age and developmentally appropriate opportunities for children/learners to develop critical thinking, respectful relationships, understanding of difference and the knowledge and skills needed to participate safely in modern Britain. Schools will actively promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Appropriate opportunities to discuss controversial issues safely can contribute to resilience against extremist narratives and radicalisation.

Current Guidance and Resources

- [Prevent Duty Guidance for England and Wales](#)
- [DfE: Safeguarding learners vulnerable to radicalisation](#)
- [Understanding and identifying radicalisation risk in education settings](#)
- [Managing risk of radicalisation in education settings](#)
- [Home Office Prevent Duty Training](#)
- [Key Principles of Prevent – February 2026](#)
- [Channel Duty Guidance](#)

Appendix 5

Domestic Abuse, Relationship Abuse and Operation Encompass

Domestic abuse can have a profound and long-lasting impact on children and young people. Melrose Education recognises that children may experience domestic abuse in a number of ways, including seeing, hearing, or experiencing the effects of abuse between adults, experiencing abuse within their own intimate relationships, or living within families where abuse occurs between family members.

Under the Domestic Abuse Act 2021, domestic abuse may consist of a single incident or a course of conduct between people aged 16 or over who are personally connected. Abuse may include:

- physical or sexual abuse.
- violent or threatening behaviour.
- controlling or coercive behaviour.
- economic abuse; and
- psychological, emotional, or other abuse.

A child is recognised as a victim of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse and are related to either the person experiencing or perpetrating the abuse.

Domestic abuse can occur regardless of sex, gender, sexuality, ethnicity, religion, disability, age, or socioeconomic background.

Impact on Children

Children do not have to directly witness an incident of domestic abuse to be affected by it. They may hear abuse, see injuries or damage, experience changes in parenting or family relationships, become involved in attempts to protect family members, experience coercive control within the household, or live with the fear and unpredictability created by abuse.

The impact may present in many different ways, including:

- anxiety, fear, or hypervigilance.
- withdrawal or aggression.
- changes in behaviour or emotional regulation.
- sleep difficulties, tiredness, or regression.
- changes in attendance, engagement, or educational progress.
- difficulties with relationships and trust.
- reluctance to leave or return home.
- taking on inappropriate caring or protective responsibilities; or
- apparently coping particularly well or becoming highly compliant or perfectionistic.

There is no single presentation of a child affected by domestic abuse. Staff should remain professionally curious when there are changes in a child's behaviour, wellbeing, relationships, or circumstances.

Teenage and Young People's Relationship Abuse

Children and young people can experience abuse within their own intimate relationships. This may include controlling or coercive behaviour, physical or sexual abuse, emotional or psychological abuse, harassment, stalking, threats, economic abuse and technology-facilitated abuse, including monitoring, image-based abuse or control through phones, social media, or location-sharing.

Where both individuals are aged 16 or over and personally connected, abusive behaviour may fall within the statutory definition of domestic abuse.

Where one or both children are under 16, abusive behaviour within a relationship remains a safeguarding concern and should be considered under relevant child protection and child-on-child abuse procedures.

Staff should not dismiss abusive or controlling behaviour as ordinary teenage relationship difficulties.

Child/Adolescent-to-Parent Violence and Abuse

Melrose schools recognise that some families may experience child or adolescent-to-parent violence and abuse (CAPVA). This can include physical violence or threats, intimidation, coercive or controlling behaviour, emotional or psychological abuse, damage to property or other behaviour which causes a parent/carer or other family member to feel frightened, controlled, or unsafe.

Where the person displaying abusive behaviour is aged 16 or 17, the behaviour may fall within the statutory definition of domestic abuse where the relevant criteria are met. Behaviour by younger children may not meet the statutory definition of domestic abuse but can nevertheless cause significant harm and require a safeguarding response.

Responses should consider the needs and safety of the whole family, including the parent/carer experiencing the behaviour and the child displaying it. Staff should remain curious about what may be contributing to the behaviour, including trauma, abuse, exploitation, SEND, mental health or other unmet needs, without excusing harmful behaviour or assuming that these factors are necessarily present.

Children displaying harmful or abusive behaviour may themselves be in need of safeguarding, assessment, and support. A parent can be frightened of their child while the child displaying the harmful behaviour can simultaneously have significant safeguarding needs of their own.

Responding to Concerns

Where staff are concerned that a child/learner or their family may be experiencing domestic or relationship abuse, they should report the concern to the DSPL/DDSL in accordance with the school's safeguarding procedures.

The safety of the child and any other affected family members should be considered when deciding whether and how to involve parents/carers. Staff should not automatically contact a parent where doing so could increase risk to the child or another person.

Appropriate referrals, information sharing and multi-agency support will be considered in accordance with local safeguarding procedures.

Operation Encompass

Operation Encompass enables police and education settings to share information following police attendance at domestic abuse incidents involving children. This allows the school's trained Key Adult to ensure appropriate support is available to the child.

Information should be handled sensitively and shared only with those who need it to safeguard and support the child. Staff should consider the child's individual needs and circumstances rather than assuming how they will have been affected by an incident.

Appendix 6

Child Exploitation, including Child Sexual Exploitation, Child Criminal Exploitation and County Lines

Child exploitation is a form of abuse. It can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate, deceive, or groom a child into sexual or criminal activity or other harmful behaviour.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) may involve an exchange for something the child needs or wants and/or provide financial or other advantage to the perpetrator, facilitator, or others. A child may also be exploited through threats, violence, coercion, intimidation, debt, deception, affection, status, belonging, or perceived protection.

The imbalance of power may relate to factors including age, developmental stage, gender, sexual identity, cognitive ability, disability or SEND, physical strength, status, access to resources or the child's circumstances.

Exploitation may:

- be perpetrated by adults or children, individually or in groups.
- occur on a single occasion or repeatedly over time.
- range from opportunistic exploitation to complex organised abuse.
- occur within families, peer groups, communities, or organised criminal networks.
- take place wholly or partly online.
- involve movement between locations or occur within the child's own local community.
- involve violence or threats, although these do not have to be present; and
- involve children who themselves may also be experiencing exploitation.

A child cannot consent to their own exploitation. Apparent compliance, receipt of money or gifts, returning to an exploiter, or reluctance to engage with professionals does not mean that the child has freely chosen or consented to the abuse.

Children may not recognise that they are being exploited and may perceive an exploiter as a friend, partner, protector, or someone who provides them with affection, status, money, drugs, accommodation, belonging or other things they value or need.

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It may occur over time or as a single incident and may involve physical contact or non-contact sexual activity, including abuse facilitated through technology.

CSE can affect any child, including 16 and 17-year-olds who can legally consent to sexual activity. A child may consent to sexual activity but cannot consent to exploitation.

CSE may include grooming a child into sexual activity, producing, or sharing sexual images, live-streamed abuse, sexual activity in exchange for money, gifts, accommodation, drugs, affection, status or protection, or coercing a child into sexual activity for the benefit of others.

Child Criminal Exploitation

Child Criminal Exploitation (CCE) occurs where a child is coerced, manipulated, deceived, or otherwise exploited into criminal activity for the benefit of another person or group. This may include children being exploited to:

- transport, store, or sell drugs.
- carry or conceal money, weapons, or other items.
- commit theft, robbery, shoplifting, or vehicle crime.

- work in cannabis cultivation or other criminal enterprises.
- threaten, assault, or commit serious violence against others.
- recruit or facilitate the exploitation of other children; or
- undertake other criminal activity.

Children who are criminally exploited should be recognised first and foremost as children who may be victims of abuse, even where they have committed criminal offences.

Staff should be alert to adultification and other forms of bias which may result in children, particularly some groups of children, being perceived primarily as offenders rather than as children who may themselves require safeguarding and protection.

County Lines

County lines is a form of criminal exploitation associated with gangs and organised criminal networks involved in moving illegal drugs between locations, often using dedicated mobile phone lines or other forms of communication.

Children and vulnerable adults may be exploited to transport, store or sell drugs and money and may be subjected to coercion, intimidation, violence, sexual abuse, debt bondage or threats against themselves or others.

County lines activity is not limited to movement between counties and exploitation may occur locally as well as across geographical areas.

Staff should also be aware of cuckooing, where offenders take over or use the home of a child, vulnerable adult, or family as a base for criminal activity.

Possible Indicators of Exploitation

There is no single indicator of exploitation. Staff should consider patterns, changes in behaviour, relationships, circumstances, and the child's lived experience.

Possible indicators may include:

- going missing from home, care, or education.
- persistent or unexplained absence from education, including absence for part of the school day.
- unexplained travel or movement between locations.
- being found in areas or premises of concern.
- travelling in vehicles with unknown or concerning individuals.
- unexplained money, clothing, phones, possessions, or other items.
- possession of multiple phones or SIM cards.
- unexplained debt or concerns about owing money, drugs, or favours.
- association with older individuals, groups or people known to be involved in exploitation or criminality.
- relationships involving significant power imbalances, control, or coercion.
- sudden changes in peer groups or relationships.
- increased secrecy or unexplained changes in behaviour.
- fearfulness, anxiety, hypervigilance, or emotional distress.
- injuries or evidence of physical or sexual assault.
- drug or alcohol use.
- carrying weapons.
- involvement in offending or contact with police.
- sexual health concerns, including sexually transmitted infections or pregnancy.
- sexualised behaviour or knowledge which raises safeguarding concerns.
- receiving gifts, accommodation, transport, drugs, affection, or status from concerning individuals.

- recruiting, introducing, or facilitating the involvement of other children.
- unexplained use of hotels, short-term accommodation, or other locations.
- concerning online relationships or contact.
- coercion involving intimate images, including threats to share images.
- evidence of online grooming, sexual exploitation, or criminal recruitment.
- significant deterioration in attendance, engagement, or educational progress; or
- self-harm, suicidal thoughts, or significant changes in emotional wellbeing.

Indicators should not be considered in isolation. Some children experiencing exploitation may show very few outward signs, continue attending school and achieving academically, or actively defend the people exploiting them.

Online and Technology-Facilitated Exploitation

Exploitation increasingly crosses between children's online and offline lives. Social media, messaging services, gaming platforms, and other digital environments may be used to identify, groom, manipulate, threaten, recruit or control children.

Technology may also be used to monitor a child's location, create, or distribute intimate images, including manipulated or AI-generated images, blackmail children, facilitate financial exploitation or maintain control over them.

Staff should therefore consider children's online relationships and experiences as part of their wider safeguarding context rather than treating online and offline exploitation separately.

Missing and Absent Children

Missing episodes and persistent or unexplained absence from education can be important indicators of exploitation. However, absence alone should not be treated as evidence of exploitation, and children who continue to attend regularly may nevertheless be experiencing significant harm.

Repeated missing episodes should be considered cumulatively and information from return-home interviews, police, Children's Social Care, family members, education, and other agencies should inform assessment of risk where available.

Responding to Concerns

Any concern that a child may be experiencing, or be at risk of, sexual or criminal exploitation must be shared promptly with the DSPL/DDSL.

The DSPL/DDSL will consider the information available, the child's circumstances and relevant local safeguarding procedures and assessment tools.

Where appropriate, advice or referral will be made to Children's Social Care, police, exploitation services, or relevant multi-agency arrangements.

As Melrose schools operate across different local authorities, local exploitation pathways, assessment tools and arrangements such as MACE or equivalent should be identified within each school's local safeguarding information rather than prescribing a single process within this group policy.

Where a child is in immediate danger, the police should be contacted on **999**. The child's wishes and feelings should be sought and considered, but reluctance to engage or the child's perception that they are making their own choices must not prevent appropriate safeguarding action.

Prevention

Schools will provide age and developmentally appropriate education through PSHE, RSE, online safety and the wider curriculum to help children understand healthy relationships, grooming, exploitation, coercion, consent, online risks and where to seek help.

Preventative education should avoid placing responsibility upon children to prevent their own exploitation. Responsibility for abuse always lies with those who exploit children.

Appendix 7

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is a form of child abuse and violence against women and girls. It is illegal in England and Wales under the Female Genital Mutilation Act 2003.

FGM comprises procedures involving the partial or total removal of external female genitalia, or other injury to female genital organs, for non-medical reasons.

FGM can have serious and lifelong physical, psychological, sexual, and emotional consequences. It may be carried out during infancy, childhood, adolescence or later in life.

No religion requires FGM, and cultural, religious, or traditional beliefs do not justify the practice.

FGM prevalence varies considerably within countries, regions and communities, and a static nationality list can encourage racial/cultural profiling. Family history, statements, planned procedures, beliefs and other contextual information are much more useful safeguarding indicators.

Staff should understand that FGM may be associated with social norms, tradition, marriageability, ideas about sexuality or perceived cultural/religious expectations, but listing *"cleanliness, purity, cosmetic desirability..."* risks repeating justifications unnecessarily. **The essential safeguarding message is that whatever the stated rationale, FGM is abuse and is illegal.**

Types of FGM

FGM is generally classified into four types:

- **Type 1** – partial or total removal of the clitoral glans and/or prepuce.
- **Type 2** – partial or total removal of the clitoral glans and labia minora, with or without removal of the labia majora.
- **Type 3** – narrowing of the vaginal opening through the creation of a covering seal (infibulation); and
- **Type 4** – other harmful procedures to the female genitalia for non-medical purposes, including pricking, piercing, incising, scraping, or cauterisation.

Mandatory Reporting Duty

Section 5B of the Female Genital Mutilation Act 2003 places a personal mandatory reporting duty on teachers in England and Wales where in the course of their professional work:

- a girl under 18 tells them that FGM has been carried out on her; or
- they observe physical signs which appear to show that FGM has been carried out on a girl under 18 and there is no reason to believe that the procedure was medically necessary.

The duty applies to qualified teachers and other persons employed or engaged to carry out teaching work, whether or not they have Qualified Teacher Status.

The teacher who identifies the known case has a personal legal responsibility to make the report. This responsibility cannot be transferred to the DSPL/DDSL, although the DSPL should also be informed and normal safeguarding procedures followed.

The recommended method of reporting is by calling the police on **101** and explaining that the report is being made under the FGM mandatory reporting duty.

Reports should be made as soon as possible, with best practice being by the close of the next working day. Where there is an immediate risk to life or likelihood of serious immediate harm, the police should be contacted immediately, including by calling **999** where appropriate.

There are no circumstances in which a teacher or other school member of staff should examine a child to determine whether FGM has taken place.

Suspected FGM or Risk of FGM

The mandatory reporting duty applies to known cases. It does not apply merely because a member of staff suspects that FGM may have occurred or believes that a child may be at risk of FGM.

Where FGM is suspected, or a child may be at risk of FGM, staff must report the concern immediately to the DSPL/DDSL and follow the school's usual safeguarding and local multi-agency procedures. Appropriate referral to Children's Social Care and/or police should be considered.

Staff should also consider whether other children within the family or wider family network may be at risk.

This distinction between known cases and suspected/at-risk cases is explicitly set out in the statutory and procedural guidance.

Possible Indicators that a Child May Be at Risk

There is no single indicator that a child is at risk of FGM. Staff should consider the child's circumstances as a whole and avoid making assumptions based solely upon ethnicity, nationality, religion, or cultural background.

Possible indicators may include:

- a child talking about a forthcoming ceremony or procedure.
- a child saying that they are going to have a special procedure or be "cut."
- a child expressing anxiety about a forthcoming trip or family event.
- plans for an extended trip or absence where other information raises concern.
- a child saying that they will undergo a procedure before marriage or adulthood.
- a mother, sister or other family member having experienced FGM.
- family members expressing support for or acceptance of FGM; or
- other information from the child, family, community, or professionals which indicates that the child may be at risk.

Travel abroad or a family's country of origin should never, by itself, be treated as evidence that a child is at risk of FGM.

Possible Indicators that FGM May Have Occurred

Possible indicators may include:

- prolonged or unexplained absence followed by a change in behaviour or presentation.
- difficulty walking, sitting, or standing comfortably.
- spending longer than usual using the toilet.
- urinary or menstrual difficulties.
- frequent urinary, menstrual, or abdominal problems.
- reluctance to participate in physical activity where this represents a change.
- withdrawal, anxiety, depression or other significant emotional or behavioural change.
- reluctance to undergo medical examination.
- asking for help without explaining the nature of the problem.
- talking about pain or discomfort between the legs; or
- telling someone that a procedure has been carried out but that they have been told not to talk about it.

These indicators are not proof that FGM has occurred and may have many other explanations. Staff should record and report concerns rather than attempt to investigate or diagnose them. Current statutory guidance gives similar potential indicators while stressing that the list is not exhaustive.

One Chance Rule

FGM is sometimes described as a “one chance” safeguarding issue, because professionals may have only one opportunity to recognise risk and take protective action before a child is harmed.

Concerns must therefore be taken seriously and acted upon without delay. Staff must not investigate the concern themselves or approach family members where doing so could increase the risk to the child.

See also Appendix 10 – One Chance Rule.

Further Guidance

Multi-agency statutory guidance on Female Genital Mutilation
Mandatory reporting of FGM: procedural information

Appendix 8

Forced Marriage

Forced marriage is a criminal offence, a form of abuse and a serious violation of human rights. It can affect children and adults of any sex, gender, religion, ethnicity, culture, disability, or background.

For an adult, a forced marriage is one in which one or both people do not freely consent to the marriage and violence, threats or another form of coercion is used. Coercion may include physical, psychological, sexual, financial, or emotional pressure.

Where an adult lacks capacity to consent to marriage, coercion is not required for the marriage to be forced.

For children, the law is different. Since 27 February 2023, it is an offence to carry out any conduct for the purpose of causing a child to marry before their 18th birthday, even where violence, threats or another form of coercion are not used. The minimum age for marriage and civil partnership in England and Wales is 18.

A forced marriage is different from an arranged marriage between adults. In an arranged marriage, families may take a leading role in introducing or arranging a prospective marriage, but the individuals themselves retain the free choice whether or not to marry. An arranged marriage becomes a forced marriage where an adult does not freely consent or is subjected to coercion.

This distinction does not apply to children under 18. A child cannot legally marry or enter a civil partnership in England and Wales, and conduct intended to cause them to marry is an offence regardless of apparent consent.

Possible Indicators

There is no single indicator that a child is at risk of forced marriage. Possible concerns may include:

- a child talking about an impending engagement, marriage, or ceremony.
- discussion of marriage which the child appears unhappy, frightened, or uncertain about.
- a forthcoming overseas trip which raises concerns in the wider context.
- extended or unexplained absence from education.
- a child fearing that they will not be allowed to return to education following a holiday.
- increased restrictions, surveillance, or control by family members.
- withdrawal from education or extracurricular activities.
- family disputes concerning relationships, sexuality, marriage, or perceived family expectations.
- siblings or other family members having experienced forced marriage.
- domestic abuse or so-called 'honour'-based abuse within the family.
- self-harm, depression, anxiety, isolation, or significant changes in behaviour.
- a child going missing or expressing fear about returning home; or
- a child directly or indirectly communicating concerns about being expected or required to marry.

Indicators should be considered in context, and assumptions must not be made on the basis of ethnicity, religion, nationality, or culture.

Responding to Concerns

Any concern that a child/learner may be at risk of, or experiencing, forced marriage must be reported immediately to the DSPL/DDSL and dealt with through safeguarding procedures.

Where possible, the child should be spoken with alone in a safe and private environment. Staff must not:

- approach or involve the child's family or community where forced marriage is suspected.
- attempt mediation, reconciliation, or family counselling.
- contact family members overseas.
- share information with family members without appropriate safeguarding consideration; or
- attempt to resolve the situation themselves.

Involving family or community members can significantly increase risk, including the possibility that travel or marriage arrangements will be brought forward. Government statutory guidance specifically warns that family group conferences are not normally appropriate in forced-marriage cases because they can increase the risk to the child.

The DSPL/DDSL should follow local safeguarding procedures and consider referral to Children's Social Care, police, and/or specialist services. Advice can also be sought from the Forced Marriage Unit (FMU), which provides support and advice to professionals as well as people affected by forced marriage.

Where there is an immediate risk of harm, the police should be contacted on **999**.

The One Chance Rule

Forced marriage is subject to the **One Chance Rule**. Professionals may have only one opportunity to speak with a child or potential victim and to take action which prevents serious harm.

Staff must therefore act promptly, listen carefully, take concerns seriously and ensure that the child does not leave without appropriate safeguarding consideration where an immediate risk has been identified.

See also Appendix 9 – 'Honour'-Based Abuse and Appendix 10 – One Chance Rule.

Further Guidance

The Right to Choose – statutory and multi-agency forced marriage guidance
Forced Marriage Unit information and support

Appendix 9

So-Called 'Honour'-Based Abuse

So-called 'honour'-based abuse (HBA) describes a range of abusive practices used to control an individual's behaviour in order to protect or restore the perceived honour of a family or community.

There is no honour in abuse. HBA is a form of abuse and may include physical, emotional, psychological, sexual, or financial abuse, coercive or controlling behaviour, forced marriage, female genital mutilation, and other harmful practices.

HBA may be perpetrated by one or more family members or others within the wider community. It can affect children and adults of any sex or gender.

A child/learner may be perceived to have brought 'shame' or dishonour upon a family or community because of, for example:

- a friendship or intimate relationship which is not approved by family members.
- refusing or seeking to leave a forced marriage.
- expressing views about marriage, relationships, or sexuality which conflict with family expectations.
- wearing clothes, socialising, or taking part in activities which are considered unacceptable by others.
- seeking greater independence.
- reporting abuse or seeking help from professionals.
- being lesbian, gay, or bisexual, or being perceived to be.
- questioning expected gender roles; or
- other behaviour which is perceived to challenge family or community expectations.

These examples are not exhaustive, and staff must avoid making assumptions based on a child's ethnicity, religion, culture, or family background.

Responding to Concerns

Any concern that a child/learner may be experiencing, or at risk of, so-called 'honour'-based abuse must be reported immediately to the DSPL/DDSL and responded to through safeguarding procedures.

Staff must be particularly cautious about contacting or involving family or community members, as doing so may increase the risk to the child or alert those involved.

Staff should not attempt mediation, family reconciliation, or community intervention. Advice should be sought from Children's Social Care, police, or specialist services as appropriate.

Where there is an immediate risk of serious harm, the police should be contacted on **999**.

So-called 'honour'-based abuse is subject to the One Chance Rule where professionals may have only one opportunity to speak to a child or potential victim and take action which prevents serious harm.

See also:

Appendix 7 – Female Genital Mutilation

Appendix 8 – Forced Marriage

Appendix 10 – One Chance Rule

Appendix 10

One Chance Rule

The One Chance Rule applies particularly to safeguarding concerns involving forced marriage, female genital mutilation (FGM), and so-called 'honour'-based abuse.

It recognises that professionals may have only one opportunity to speak with a child/learner, identify risk and take protective action before the child is removed from contact, taken abroad, placed under greater control, or otherwise exposed to serious harm.

Staff must therefore:

- take any concern seriously and act without delay.
- listen carefully and allow the child/learner to speak safely and privately.
- avoid making promises of confidentiality.
- record the concern accurately.
- report immediately to the DSPL/DDSL.
- avoid contacting family or community members where this could increase risk.
- avoid mediation, reconciliation or attempting to resolve the issue themselves; and
- seek appropriate safeguarding advice and referral without delay.

Where there is an immediate risk of serious harm, the police should be contacted on **999**.

The One Chance Rule does not mean staff should investigate. It means they must recognise the significance of the opportunity, respond safely, and ensure the concern is not missed, minimised or delayed.

Appendix 11

Mental Health and Safeguarding

Melrose Education recognises that children's mental health and emotional wellbeing are closely connected with their safety, development, relationships, attendance, and ability to engage in education.

Staff should be 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.

Only appropriately trained professionals should diagnose mental health conditions. However, school staff are well placed to observe children on a day-to-day basis and may identify changes in behaviour, presentation, relationships, attendance, or engagement which suggest that a child may be experiencing mental health or emotional wellbeing difficulties.

Possible indicators may include:

- significant or persistent changes in mood or behaviour.
- anxiety, fearfulness, or hypervigilance.
- withdrawal or social isolation.
- emotional dysregulation, anger, or aggression.
- changes in eating or sleeping.
- reduced engagement or deterioration in educational progress.
- persistent or unexplained absence.
- loss of interest in activities or relationships.
- expressions of hopelessness, worthlessness, or significant distress.
- self-harm.
- suicidal thoughts, statements, or behaviour.
- substance misuse; or
- significant changes in presentation, self-care, or relationships.

No single indicator should be considered in isolation. Staff should remain professionally curious about what may be happening in the child's life and consider whether behaviour being attributed to mental health may also indicate abuse, neglect, exploitation, bullying, domestic abuse, trauma, or another safeguarding concern.

Trauma and Adverse Experiences

Abuse, neglect, exploitation, domestic abuse, bereavement, bullying, discrimination, family difficulties and other adverse or traumatic experiences can affect a child's mental health, behaviour, relationships, and education.

Staff should understand that behaviour may be a form of communication and seek to understand the need or experience underlying the behaviour, while maintaining appropriate expectations and boundaries.

A trauma-informed approach should support, rather than replace, appropriate safeguarding action.

SEND and Mental Health

Staff should be particularly alert to children/learners with SEND, who may experience additional barriers to communicating emotional distress or accessing appropriate support.

Changes in behaviour or presentation should not automatically be attributed to a child's SEND or disability. Staff should consider whether there may be an underlying mental health or safeguarding concern.

Equally, behaviour associated with SEND should not automatically be interpreted as evidence of mental ill-health.

Self-Harm and Suicidal Ideation

Any disclosure, indication or concern relating to self-harm or suicidal thoughts or behaviour must be taken seriously.

Staff should report concerns promptly in accordance with school procedures so that appropriate assessment, support, and safeguarding action can be considered.

Where there is concern that a child is at immediate risk of serious harm, emergency services or other appropriate urgent support should be contacted.

Responding to Concerns

Where a member of staff has concerns about a child's mental health or emotional wellbeing, they should follow the school's procedures and seek appropriate support.

Where the concern is also a safeguarding concern, it must be reported without delay to the DSPL/DDSL.

The school will consider the child's wishes, feelings, and work appropriately with parents/carers, the Senior Mental Health Lead, SENDCo, health professionals, Children's Social Care, and other services as required.

Where involving a parent/carer could increase risk to the child, safeguarding advice should be sought before doing so.

Support should be proportionate to the child's individual needs and may include school-based support, Early Help/family help, pastoral or SEND support, mental health services, or other specialist services.

Whole-School Approach

Melrose schools will promote positive mental health and wellbeing through a whole-school approach which includes:

- creating safe, inclusive environments where children feel they belong.
- developing trusted relationships between children and adults.
- providing opportunities for children to communicate concerns.
- supporting emotional literacy and regulation.
- addressing bullying, discrimination, and isolation.
- considering the relationship between mental health, behaviour, and attendance.
- ensuring staff understand relevant referral and support pathways; and
- providing appropriate mental health and wellbeing education through the curriculum.

DfE continues to recommend a whole-school approach to mental health and wellbeing, and its current resource page was updated in April 2026.

Further Guidance and Resources

- [DfE – Mental health and behaviour in schools](#)
- [DfE – Promoting and supporting mental health and wellbeing in schools and colleges](#)
- Anna Freud – mental health resources for schools and colleges
- MindEd – children and young people's mental health learning resources

Appendix 12

Private Fostering Arrangements and Kinship Care

A private fostering arrangement occurs when a child under the age of 16, or under 18 if disabled, cared for 28 days or more by someone who is not:

- their parent.
- a person with parental responsibility for them; or
- a close relative.

For private fostering purposes, a close relative includes a grandparent, brother, sister, uncle, aunt, or stepparent. Aunts, uncles, and siblings may be related by full or half blood or by marriage/civil partnership.

A parent's unmarried partner, cousin, great-aunt, great-uncle, or family friend is not treated as a close relative for this purpose.

Children who are looked after by a local authority, or who are accommodated in certain establishments such as residential schools, children's homes or hospitals in circumstances excluded by the legislation, are not privately fostered.

Examples of Private Fostering

Private fostering arrangements may arise where a child is:

- living with a family friend because of a family crisis.
- living with the family of a friend or partner.
- living apart from their parents because of work, study, or family circumstances.
- living in the UK while their parents are overseas.
- an overseas student staying with a host family.
- an unaccompanied or migrant child living with someone who is not a close relative; or
- in another arrangement where someone outside the statutory definition of a close relative provides full-time care for 28 days or more.

Private fostering may occur in families and communities of any background.

Notification to the Local Authority

Parents, private foster carers, and others involved in arranging a private fostering placement have legal responsibilities to notify the relevant local authority.

Where a member of staff becomes aware that a child/learner may be privately fostered, they should report this to the DSPL/DDSL.

The DSPL/DDSL will ensure that the relevant local authority is informed where required and will follow local private fostering procedures. The local authority has responsibility for assessing the arrangement and ensuring that the child's welfare is safeguarded.

Staff should not assume that another person has already notified the local authority.

Safeguarding and Private Fostering

Most privately fostered children will be safe and appropriately cared for. However, private fostering arrangements may sometimes increase vulnerability where professionals are unaware of who is caring for a child or the circumstances in which the arrangement was made.

Staff should remain professionally curious about:

- who has parental responsibility.
- who the child is living with and why.
- how long the arrangement is expected to last.
- whether the local authority has been notified.
- the child's wishes, feelings, and experience of the arrangement; and
- whether there are any additional safeguarding concerns, including exploitation, trafficking, neglect, or inappropriate caregiving arrangements.

The existence of a private fostering arrangement is not itself evidence of abuse or neglect, but it must be recognised and appropriately notified.

Kinship Care

Kinship care is a broader term describing arrangements in which a child is cared for by relatives, friends, or other people with whom they have a significant pre-existing relationship because they cannot live with their parents.

Kinship care may take a number of legal and informal forms, including:

- informal arrangements with relatives or friends.
- private fostering arrangements.
- Child Arrangements Orders.
- Special Guardianship Orders.
- kinship foster care where a child is looked after by the local authority; and
- adoption by a family member or connected person.

The Department for Education's statutory guidance recognises that kinship families can have very different legal arrangements, rights, and support needs.

Staff should ensure they understand who holds parental responsibility, who can make decisions for the child, and whether there are court orders, local authority arrangements, or restrictions relevant to the child's education and safeguarding.

Children living in kinship care should not automatically be viewed as safeguarding concerns. However, practitioners should understand the circumstances leading to the arrangement and remain alert to any support or safeguarding needs affecting the child or family.

Further Information

[Looking after someone else's child – GOV.UK](#)

[Kinship care: statutory guidance for local authorities – GOV.UK](#)

NOTE "Relatives also include stepparents/kinship care" which muddles two different concepts. A stepparent can be a close relative for private fostering law, while kinship care is a much broader umbrella term covering several kinds of arrangement.

Different authorities organise private fostering notifications differently, so "safeguarding team" may not be the correct route everywhere.

Appendix 13

Looked-After and Previously Looked-After Children

Melrose Education recognises that children who are looked after and children who have previously been looked after may have experienced abuse, neglect, loss, trauma, disrupted relationships or other adverse experiences which can affect their safety, wellbeing, relationships, attendance, behaviour, and educational progress.

Schools will ensure that staff have the knowledge, skills and understanding necessary to safeguard and support looked-after and previously looked-after children and promote their educational achievement.

Appropriate staff will have relevant information about a looked-after child's:

- legal status and care arrangements.
- social worker and other key professionals.
- level of authority delegated to carers.
- contact arrangements with parents, family members, or others with parental responsibility.
- Personal Education Plan (PEP); and
- any safeguarding, educational, health or SEND needs relevant to their role.

Information will be shared on a need-to-know basis and handled in accordance with safeguarding and data protection requirements.

Designated Teacher

Each school will ensure that the appropriate Designated Teacher for looked-after and previously looked-after children is in place in accordance with statutory requirements.

The Designated Teacher will work closely with the DSPL/DDSL, Virtual School Head, social worker, carers, parents where appropriate, SENDCo and other relevant professionals to promote the child's safety, wellbeing, attendance, educational achievement, and inclusion.

The Designated Teacher will ensure that the needs of looked-after and previously looked-after children are understood across the school and that staff maintain appropriately high expectations for their education and development.

The DSPL and Designated Teacher should have details of the child's social worker and relevant Virtual School contact where applicable.

Personal Education Plans and Pupil Premium Plus

Every looked-after child will have a Personal Education Plan (PEP) as part of their wider care plan.

The Designated Teacher will contribute to the development and review of the PEP and work with the Virtual School Head and other professionals to ensure that identified educational needs and appropriate support are addressed.

For looked-after children, the Virtual School Head manages the Pupil Premium Plus allocation. The Designated Teacher should work with the Virtual School Head to consider how funding can best support the child's educational outcomes and needs identified through the PEP.

For eligible previously looked-after children, Pupil Premium Plus is allocated to and managed by the school. The Designated Teacher has an important role in ensuring that their needs are appropriately reflected within the school's Pupil Premium strategy.

The school will follow the statutory guidance Promoting the education of looked-after and previously looked-after children and the designated teacher for looked-after and previously looked-after children.

Virtual School Head and Kinship Care

Virtual School Heads have statutory responsibilities in relation to looked-after and certain previously looked-after children.

Their role has also been extended to promote, at a strategic level, the educational outcomes of children with a social worker and children in kinship care.

Since September 2024, this extended role has included championing the attendance, attainment, and progress of children in kinship care, including greater focus on the distinct educational needs and barriers experienced by this group.

The extended role does not mean that every child in kinship care receives individual intervention from the Virtual School. However, schools and eligible kinship carers may be able to seek information and advice from their local Virtual School.

Safeguarding and Supporting Children

Staff should recognise that a child's care status or previous care experience may be relevant to their safeguarding needs but should not make assumptions about an individual child because they are, or have been, looked after.

Staff should remain professionally curious about changes in a child's behaviour, relationships, attendance, emotional wellbeing, or educational engagement and consider the child's lived experience and individual circumstances.

Where safeguarding concerns arise, these must be responded to in accordance with the school's normal safeguarding procedures and in collaboration with the child's social worker and other relevant professionals where appropriate.

The child's wishes and feelings should be considered, and their voice should inform decisions affecting them.

Further Guidance

[Promoting the education of looked-after and previously looked-after children](#)

[Designated teacher for looked-after and previously looked-after children](#)

[Virtual School Head role for children with a social worker and children in kinship care](#)

Appendix 14

Children Absent or Missing from Education, Home, and Care

Melrose Education recognises that absence and missing episodes can be important safeguarding indicators. A child who is absent from education, missing from home or care, or repeatedly absent for part of the school day may be experiencing abuse, neglect, exploitation, mental ill-health, family difficulties, or other harm.

Schools will maintain an attitude of professional curiosity and consider why a child is absent, what may be happening around them and whether patterns of absence indicate increasing vulnerability or risk.

Children Missing Education

For statutory purposes, a child missing education (CME) is a child of compulsory school age who is not registered at a school and is not receiving suitable education otherwise than at school.

Schools will work with local authorities in accordance with Children Missing Education: statutory guidance for local authorities and schools, including appropriate notification where children are removed from roll or their whereabouts or educational provision are uncertain.

CME should not be confused with a child who remains on roll but is absent from school. Both circumstances may, however, raise safeguarding concerns.

Children Absent from Education

Repeated or prolonged absence from education, including absence for part of the school day, can be an important warning sign of safeguarding concerns.

Staff should be alert to patterns of:

- persistent or severe absence.
- unexplained or repeated absence.
- absence for part of the school day.
- unexplained changes in attendance.
- repeated failure to return after holidays or agreed leave.
- absence associated with changes in behaviour, relationships, or family circumstances.
- children whose whereabouts cannot be established.

Possible underlying concerns may include abuse or neglect, child sexual or criminal exploitation, domestic abuse, bullying, mental ill-health, unmet SEND, forced marriage, female genital mutilation, trafficking, radicalisation or other family or contextual risks.

Schools will follow Working Together to Improve School Attendance, which sets out statutory responsibilities for schools, trusts and local authorities and emphasises early support for learners who are persistently or severely absent or at risk of becoming so. The guidance was updated in July 2026.

The DSPL/DDSL should be involved where absence raises safeguarding concerns, while attendance responsibilities remain a whole-school responsibility and should not sit with safeguarding staff alone.

Missing from Home or Care

A child who goes missing from home or care may be at increased risk of abuse, exploitation, or other harm.

Repeated missing episodes should not be dismissed as simply challenging or risk-taking behaviour. Staff should consider what the missing episode may be communicating about the

child's circumstances and whether it indicates distress, exploitation, conflict, abuse, or unmet need.

Children who are looked after, trafficked, unaccompanied, experiencing exploitation or otherwise vulnerable may face additional risks when missing.

Where a child is missing from home or care, schools will work with parents/carers, Children's Social Care, police, and other relevant professionals in accordance with local procedures.

Relevant information from missing episodes, return-home interviews and other agencies should be considered as part of the child's wider safeguarding picture where available.

Emergency Contact Information

Schools will, where reasonably possible, hold at least two emergency contact numbers for each child/learner. This provides additional options for contacting a responsible adult where a child is absent and there are welfare or safeguarding concerns. Contact information will be reviewed and updated regularly.

Suspension, Exclusion and Reduced Engagement

Staff should recognise that children who experience repeated suspensions, exclusion, reduced timetables, or disengagement from education may be at increased risk of becoming less visible to professionals.

Behaviour, attendance, and exclusion should therefore be considered through a safeguarding and SEND lens, particularly where there are repeated incidents, sudden changes, or known vulnerabilities.

Suspension or exclusion does not remove the school's safeguarding responsibilities.

Responding to Concerns

Where absence or a missing episode raises safeguarding concerns:

- staff should follow the school's safeguarding and attendance procedures.
- relevant information should be shared promptly with the DSPL/DDSL.
- reasonable enquiries should be made to establish the child's welfare and whereabouts.
- patterns of absence should be considered cumulatively rather than incident by incident.
- relevant information should be shared with the local authority and other agencies where required.
- Children's Social Care or police should be contacted where appropriate; and
- where a child is in immediate danger or there is an emergency, the police should be contacted on **999**.

Where concerns remain unresolved, the school should continue to pursue and escalate them rather than assuming that another agency is managing the risk.

Further Guidance

Children Missing Education – statutory guidance
Working Together to Improve School Attendance

Appendix 15

Child-on-Child Abuse, including Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence

Melrose Education recognises that children can abuse other children and that child-on-child abuse can occur inside or outside school and online.

Child-on-child abuse must never be dismissed as “banter,” “just having a laugh,” “part of growing up” or “boys being boys.” All concerns will be taken seriously and responded to through safeguarding procedures.

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

- bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- physical abuse.
- abuse within intimate relationships between children and young people.
- sexual harassment.
- sexual violence.
- harmful sexual behaviour (HSB).
- child sexual exploitation and child criminal exploitation involving other children.
- initiation or hazing-type behaviour.
- coercive or controlling behaviour.
- misogynistic or sexually degrading behaviour.
- upskirting.
- non-consensual image-based abuse.
- consensual and non-consensual creation or sharing of intimate images and/or videos.
- AI-generated or digitally manipulated intimate images, including deepfakes; and
- other technology-facilitated abuse.

This list is not exhaustive.

Understanding Child-on-Child Abuse

Children may experience one or several forms of abuse simultaneously. Abuse can occur between children of any age, sex, or gender, between individuals or groups, and may take place face-to-face, online or through a combination of both.

Power imbalances may arise through differences in age, development, physical strength, disability or SEND, social status, popularity, access to information, possession of images, peer-group dynamics, or other factors.

Staff should remain alert to the possibility that a child displaying harmful behaviour may also have unmet needs or may themselves have experienced abuse, trauma, exploitation, or other harm. This does not excuse harmful behaviour, but it should inform assessment and support.

Gender, Misogyny and Harmful Attitudes

Schools should recognise that child-on-child abuse may be influenced by sexism, misogyny, sexual stereotypes, gender-based expectations and harmful online cultures.

Girls may disproportionately experience some forms of sexual harassment and image-based abuse, but children of any sex or gender can experience or display harmful behaviour.

Staff must avoid assumptions about victims or children displaying harmful behaviour based on sex, gender, sexuality, SEND, race, or other characteristics.

The Youth Justice Board's 2026 evidence review specifically highlights harmful sexual behaviour, misogyny, and violence by children, including widespread reports of sexual harassment and image-based abuse in schools and peer relationships.

Preventing Child-on-Child Abuse

Melrose schools will seek to reduce the likelihood of child-on-child abuse through:

- a culture of respect, inclusion and belonging.
- clear expectations for behaviour and relationships.
- consistent challenge to sexual harassment, misogyny, discrimination, and harmful language.
- developmentally appropriate PSHE and RSE.
- teaching about consent, boundaries, healthy relationships, online safety, and image-sharing.
- accessible reporting systems.
- staff training.
- appropriate supervision and risk assessment.
- early identification of emerging patterns; and
- targeted support for children who may be at increased risk of experiencing or displaying harmful behaviour.

Children/learners should know how to raise concerns for themselves or anyone they are concerned about and should understand that concerns will be taken seriously.

Responding to Concerns

Any concern or allegation of child-on-child abuse must be reported promptly to the DSPL/DDSL.

The school's response will be child-centred, proportionate, and safeguarding-led. It will consider:

- the wishes and feelings of the child affected.
- immediate safety.
- the nature and seriousness of the behaviour.
- ages and developmental stages of the children involved.
- SEND and communication needs.
- power imbalance.
- coercion, consent, and exploitation.
- whether behaviour occurred online or offline.
- whether other children may be at risk.
- whether there is evidence of a wider pattern or group dynamic; and
- whether Children's Social Care, police or other agencies should be involved.

Where a crime may have been committed, the school will consider appropriate police involvement in accordance with KCSIE and local procedures.

Appropriate support and safety planning will be provided to the child affected. The child alleged to have displayed harmful behaviour will also receive appropriate safeguarding assessment, support, and intervention.

The terms "victim" and "alleged perpetrator" may be used where appropriate, but staff should recognise that some children may not identify with these terms and that language should not unnecessarily criminalise children.

Harmful Sexual Behaviour (HSB)

Harmful Sexual Behaviour describes sexual behaviour by children that is developmentally inappropriate and may be harmful to themselves or others.

Children's sexual behaviour exists on a continuum. Behaviour may be developmentally expected, inappropriate, problematic, abusive, or violent. Assessment must therefore consider the individual child and context, rather than relying on a single behaviour in isolation.

KCSIE continues to emphasise that HSB can occur face-to-face or online and that age and developmental stage are critical when assessing behaviour.

Staff should consider:

- the ages and developmental stages of the children involved.
- the nature and frequency of the behaviour.
- equality and power imbalance.
- whether consent was freely given and understood.
- coercion, manipulation, secrecy, or threats.
- whether anyone was distressed, frightened or harmed.
- persistence or escalation.
- previous concerns.
- SEND, cognitive or communication needs.
- online elements.
- whether the behaviour may be connected to abuse, trauma, or exposure to sexual content; and
- whether specialist assessment or intervention is required.

Consent

Consent must be freely given, informed, specific, and capable of being withdrawn.

When considering behaviour between children, staff should consider whether the children involved were developmentally able to understand what was happening, whether there was an imbalance of power, and whether there was coercion, fear, pressure, or manipulation.

A child cannot consent to exploitation or abuse.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature which can occur online or offline. It may include:

- sexual comments, remarks, or jokes.
- sexualised name-calling.
- comments about someone's body or appearance.
- sexualised bullying.
- unwanted sexual touching.
- sexualised online messages.
- displaying or sharing sexual material.
- pressuring someone to share an intimate image.
- non-consensual image sharing.
- sexualised rumours.
- upskirting.
- AI-generated or manipulated sexual images; or
- other conduct which creates a hostile, humiliating, degrading, or intimidating environment.

Sexual Violence

Sexual violence includes sexual offences such as rape, assault by penetration and sexual assault.

Any report of sexual violence must be responded to in accordance with KCSIE Part Five, safeguarding procedures and relevant police/Children's Social Care guidance.

Intimate Images and AI-Generated Content

Staff should be aware that intimate image abuse may involve:

- consensual self-generated intimate images which are subsequently shared without consent.
- coercion or pressure to create or send images.
- threats to share images.
- digitally altered sexual images.
- AI-generated intimate images or deepfakes depicting a real child; and
- other forms of image-based sexual abuse.

The creation, possession or distribution of child sexual abuse material can constitute a criminal offence, including where images are AI-generated. The Crime and Policing Act 2026 further strengthens offences relating to AI-enabled child sexual abuse material.

Schools should follow current DfE/UKCIS guidance when responding to intimate-image incidents. Current government guidance recognises terms such as deepfakes and digitally manipulated intimate imagery.

Upskirting

Upskirting involves taking a photograph or video beneath a person's clothing without their permission in circumstances covered by the criminal offence, usually to obtain sexual gratification or cause humiliation, distress, or alarm.

Any concern relating to upskirting must be treated as a safeguarding matter and may require police involvement.

Initiation and Hazing

Initiation or hazing-type behaviour may involve rituals or activities used to initiate a child into a group and may include harassment, humiliation, violence, coercion, sexual behaviour, or online abuse.

Consent does not necessarily make such behaviour safe or acceptable where coercion, power imbalance, significant risk, or harm is present.

Appendix 16

Online Safety and Emerging Technology

Melrose Education recognises that technology is an integral part of children's lives and learning and that online safety is a fundamental part of safeguarding.

Technology can provide significant educational, social and communication benefits but can also facilitate abuse, exploitation, bullying, grooming, coercion, harassment, misinformation, financial harm, and other safeguarding concerns.

Online and offline safeguarding should not be considered separately. Harm may begin online and continue offline, or vice versa, and children may experience multiple overlapping risks.

Melrose schools will:

- protect and educate children/learners, staff, volunteers, and the wider school community in the safe, responsible, and appropriate use of technology.
- maintain appropriate filtering and monitoring systems.
- provide age, developmentally appropriate and accessible online safety education.
- ensure staff understand online safeguarding risks and their responsibilities.
- work with parents/carers to promote safe use of technology.
- establish clear procedures for identifying, reporting, responding to, and escalating, online safeguarding concerns; and
- regularly review emerging technologies and changing online risks.

The Four Areas of Online Risk

Our approach to online safety reflects the four broad areas of risk identified in KCSIE:

Content – being exposed to illegal, inappropriate, or harmful material, including pornography, sexual content, violence, racism, antisemitism, misogyny, self-harm or suicide content, extremist material, misinformation, disinformation, conspiracy content and AI-generated or manipulated material.

Contact – harmful interaction with other users, including grooming, coercion, bullying, harassment, exploitation, adults posing as children, harmful peer contact and individuals seeking to exploit children sexually, criminally, financially, or ideologically.

Conduct – online behaviour which causes or increases the likelihood of harm, including cyberbullying, harassment, abusive messages, sharing intimate images, image-based abuse, harmful sexual behaviour, impersonation, misuse of AI and inappropriate creation or distribution of content.

Commerce – risks associated with online gambling, gaming purchases, scams, phishing, fraud, inappropriate advertising, financial exploitation, and other commercial activity.

Artificial Intelligence, Deepfakes and Manipulated Content

Melrose schools recognise that generative artificial intelligence can provide educational benefits but also creates new safeguarding risks.

These may include:

- generating or manipulating sexual or intimate images of children.
- deepfake images, video, or audio.
- impersonation and identity misuse.
- bullying, harassment, or humiliation using generated content.
- misinformation and disinformation.
- exposure to inappropriate or harmful AI-generated content.
- use of AI to facilitate grooming, exploitation, or fraud.
- disclosure of personal or sensitive information to AI tools.
- over-reliance on AI systems or AI companion applications; and

- difficulty distinguishing authentic content from manipulated or generated material.

Staff and learners should understand that an image or recording does not have to be genuine to cause real harm.

Any AI-generated or manipulated sexual image involving a child must be treated as a safeguarding concern and responded to in accordance with the school's child-on-child abuse, intimate image, and online safety procedures.

Schools will risk assess the use of generative AI tools and take account of the DfE's current filtering and monitoring and generative AI safety standards. The DfE now specifically expects schools to consider whether their systems can handle real-time, dynamic, personalised, and AI-generated content.

Mobile Phones, Smart Watches, Smart Glasses, and Wearable Technology

References to mobile technology within Melrose policies include mobile phones, smart watches, smart glasses, wearable devices, and other personal connected technology.

Schools will establish clear expectations regarding when and how such devices may be used by children/learners, staff, and visitors.

Particular consideration should be given to devices capable of:

- taking photographs, video, or audio recordings.
- live streaming.
- accessing social media or messaging services.
- sharing or receiving images.
- location tracking.
- accessing AI tools.
- connecting independently to mobile networks; or
- recording others discreetly.

Smart glasses and other wearable recording devices create particular privacy and safeguarding risks because recording may be less visible to those around the user.

The school's detailed expectations will be contained within its Online Safety, Acceptable Use,

Mobile Device and Staff Code of Conduct Arrangements

Staff Use of Personal Devices

Staff must follow Melrose's requirements regarding personal mobile phones, cameras, and smart/wearable devices.

Personal devices must not be used to photograph, film or record children/learners or to store or transmit school safeguarding information unless explicitly authorised through an approved school system.

Where Melrose requires personal mobile devices to be stored away from learners during contact time, this expectation should be clearly communicated and consistently applied.

Filtering and Monitoring

Melrose schools will have appropriate filtering and monitoring arrangements which reflect the needs, age, SEND, risk profile, and technology use of their learners.

Proprietors retain overall strategic responsibility for ensuring that appropriate filtering and monitoring is in place.

Senior leaders, the DSPL/DDSL and IT support/provider will work together to review and maintain the school's provision.

The DSPL is responsible for safeguarding and child protection matters identified through monitoring, while technical responsibility for the systems sits with appropriately skilled IT personnel/providers.

Filtering and monitoring arrangements will be reviewed at least once every academic year, and additionally where:

- a new safeguarding risk is identified.
- new technology or generative AI is introduced.
- working practices change.
- new devices or BYOD arrangements are introduced.
- significant software or network changes occur; or
- a serious safeguarding incident raises questions about the effectiveness of existing systems.

The review should consider:

- the school's learner profile, including SEND and communication needs.
- what content is blocked and allowed.
- mobile and app-based content.
- school-managed devices used on and off site.
- generative AI use.
- technical limitations of existing systems.
- harmful or illegal content.
- patterns arising from safeguarding reports.
- curriculum requirements.
- BYOD arrangements.
- the effectiveness of monitoring alerts and responses; and
- whether staff understand their roles and responsibilities.

The DfE standard now states that filtering should consider text, images, audio, video and AI-generated content, and that mobile/app content may require specific monitoring because traditional web filtering may not capture it.

Monitoring

Monitoring may involve both technical systems and appropriate in-person supervision. Staff supervising children using technology should maintain appropriate awareness of what learners are accessing and doing online.

Technical monitoring arrangements should:

- identify high-risk concerns promptly.
- provide understandable reports to safeguarding staff.
- allow activity to be linked to individual users wherever reasonably possible.
- operate effectively on school-managed devices on and off site where required.
- have clear routes for escalating safeguarding concerns; and
- ensure responses and outcomes are recorded.

The DfE core standard now says monitoring plans should include at least weekly reports highlighting incidents and immediate reporting of high-risk incidents.

Misinformation, Disinformation and Harmful Online Communities

Staff should recognise that children may encounter misinformation, deliberate disinformation, conspiracy narratives, and harmful online communities.

These may overlap with:

- radicalisation.
- misogyny and incel-related content.
- eating disorders and extreme body-image content.
- self-harm or suicide material.
- hate speech.
- racism and antisemitism.
- violence fixation.
- exploitation; and
- other harmful belief systems or communities.

Children should be supported to develop critical digital literacy, including considering the source, credibility and purpose of online material and recognising when content may have been manipulated.

Looksmaxxing and Harmful Appearance-Based Content

Online content relating to appearance, fitness and self-improvement is not inherently harmful. However, staff should be aware that some looksmaxxing communities or content may expose children to extreme body-image expectations, misogynistic or incel narratives, harmful supplements or substances, disordered eating, dangerous physical modification, or negative messages about self-worth.

Looksmaxxing should therefore be considered within the wider context of harmful online content and communities, rather than treated as a safeguarding category in itself.

Online Safety Education

Children/learners will receive developmentally appropriate online safety education through the curriculum and wider school experience.

This should include, where appropriate:

- healthy and respectful online relationships.
- consent and boundaries.
- privacy and personal information.
- image sharing.
- online grooming and exploitation.
- cyberbullying.
- misinformation and disinformation.
- scams and financial harm.
- social media.
- gaming.
- AI and manipulated content.
- how to recognise and report harmful behaviour; and
- how and where to seek help.

Online safety education will take account of individual SEND, communication and cognitive needs and should not assume that all children understand online risk in the same way.

Parents and Carers

Schools will provide parents/carers with relevant information and resources to support safe and appropriate use of technology.

This may include guidance on:

- social media and gaming.
- online grooming.
- parental controls.
- image sharing.
- AI and deepfakes.
- mobile and wearable technology.
- online bullying.
- harmful content; and
- routes for reporting concerns.

Responding to Online Safety Concerns

Any online safety concern which may indicate abuse, neglect, exploitation, child-on-child abuse, or another safeguarding issue must be reported promptly to the DSPL/DDSL.

The fact that behaviour took place outside school or on a personal device does not remove the school's safeguarding responsibility where it affects the safety or welfare of a child/learner.

Schools will respond in accordance with safeguarding procedures and, where appropriate, involve parents/carers, Children's Social Care, police, CEOP or other specialist services.

Review and Assurance

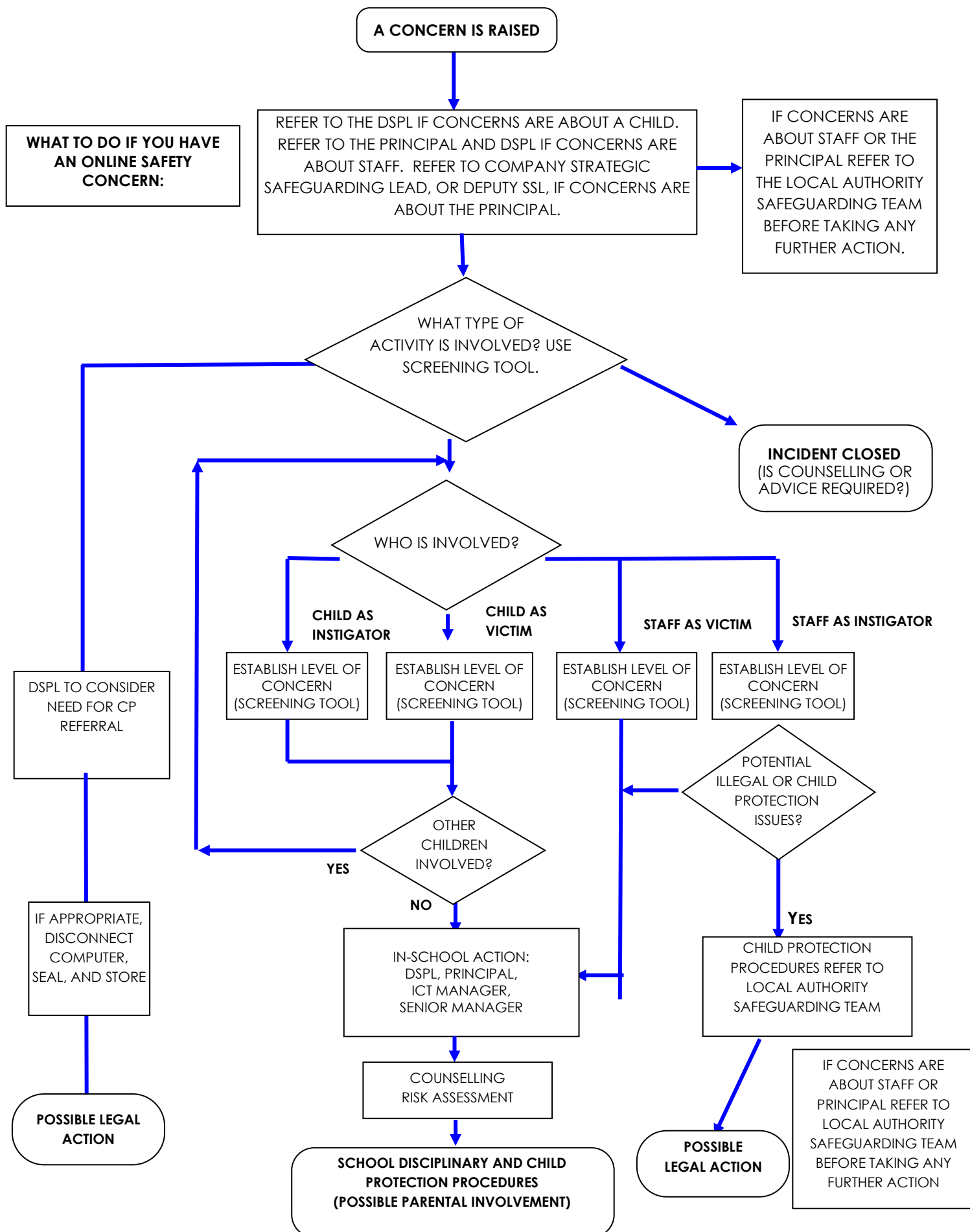
Online safety will be reviewed at least annually and when new or emerging risks arise.

Melrose schools will use relevant audits, filtering and monitoring reviews, safeguarding data, incidents, learner voice, and staff feedback to assess whether arrangements remain effective.

The school will ensure that online safety is not treated solely as an IT issue: it is a whole-school safeguarding responsibility involving leadership, safeguarding, curriculum, IT, staff, learners, and families.

Detailed procedures should be read alongside other policies and procedures such as:

- Online Safety / Acceptable Use Policy.
- Mobile Phone and Device arrangements.
- Staff Code of Conduct.
- Child-on-Child Abuse procedures.
- Intimate Images procedure.
- Data Protection and GDPR arrangements; and
- AI / Emerging Technology Policy, where applicable.



Appendix 17

Sharing Nudes and Semi-Nudes, Image-Based Abuse and AI-Generated Intimate Images

Melrose Education recognises that incidents involving nude or semi-nude images, videos or live streams created or shared by children under 18 are safeguarding concerns and must be responded to proportionately, sensitively and in accordance with current UKCIS guidance.

The term sharing nudes and semi-nudes includes the sending or posting of nude or semi-nude images, videos, or live streams by children under 18. It may involve social media, messaging apps, gaming platforms, forums, cloud services, or direct sharing between devices.

Incidents may include:

- a child creating and sharing an intimate image of themselves.
- a child sharing an intimate image created by another child.
- a child possessing an intimate image of another child.
- images being shared consensually and subsequently redistributed without consent.
- coercion, pressure, or blackmail to create or share images.
- images being used to humiliate, threaten or exploit a child.
- digitally manipulated images.
- AI-generated nude or semi-nude images or deepfakes depicting a child; or
- an adult grooming, coercing, or blackmailing a child into creating or sharing imagery.

UKCIS expressly recognises terms such as deepfakes and deep nudes and confirms that digitally manipulated and AI-generated imagery may fall within the definition of indecent pseudo-images of children.

Responding to an Incident

Any member of staff who becomes aware of an incident involving the sharing or creation of nudes or semi-nudes must:

- report the concern immediately to the DSPL/DDSL.
- follow the school's safeguarding procedures.
- not view, copy, print, forward, save or share the imagery, unless there is an exceptional safeguarding reason and this is undertaken in accordance with UKCIS guidance.
- not ask a child to send, forward or show the image to them.
- not investigate the incident themselves; and
- record what they have been told or observed accurately.

All such incidents should be treated initially as safeguarding concerns. Current UKCIS guidance states that they should be reported immediately to the DSPL/equivalent and managed under the setting's child protection arrangements.

Initial Review by the DSPL/DDSL

The DSPL/DDSL will undertake an initial review with appropriate staff and consider:

- what is known about the incident.
- how the image was created.
- whether the child created the image themselves or whether it was manipulated or AI-generated.
- who possesses or has received the image.
- how widely it may have been shared.
- whether there was consent to create and/or share the image.
- whether there was coercion, pressure, grooming, blackmail, or exploitation.
- the ages and developmental stages of those involved.
- any SEND, disability or communication needs which may affect understanding or vulnerability.

- whether an adult is involved.
- the impact on the child.
- whether there is risk of further distribution.
- whether other children may be at risk; and
- whether police, Children's Social Care or another agency should be involved.

The response should be proportionate and centred on the welfare and protection of the children involved, rather than automatically criminalising children who may themselves require safeguarding and support. UKCIS emphasises proportionality as a core principle.

When Police or Children's Social Care Should Be Considered

Police and/or Children's Social Care involvement should be considered particularly where:

- an adult is involved.
- a child has been coerced, groomed, pressured, or blackmailed.
- imagery has been shared without consent and with malicious intent.
- the content depicts sexual activity, violence, or other serious harm.
- there is concern about exploitation or abuse.
- a child may lack sufficient understanding or capacity in the circumstances.
- the incident forms part of a wider pattern of harmful sexual behaviour.
- the image has been distributed widely or uploaded publicly.
- there is an immediate risk to the child's safety or wellbeing; or
- the child is experiencing significant distress, self-harm, or suicidal thoughts.

Current UKCIS guidance specifically states that police referral should be made where a child has been pressured or coerced into sharing imagery, or where imagery has been shared without consent and with malicious intent.

Where there is immediate danger or risk of serious harm, emergency services should be contacted without delay.

Parents and Carers

Parents/carers should normally be informed and appropriately involved at an early stage.

However, they should not automatically be contacted where doing so could place the child at increased risk, prejudice an investigation or otherwise undermine safeguarding action.

The DSPL/DDSL should seek appropriate safeguarding advice where there is uncertainty about parental involvement.

Devices and Imagery

Where a device may contain relevant imagery or evidence, staff should seek immediate advice from the DSPL/DDSL and follow current UKCIS guidance and the school's procedures for handling devices. Staff should not routinely search, view, or copy imagery themselves.

AI-Generated and Manipulated Images

An incident does not become less serious because the depicted child was never actually naked or the image was artificially generated.

AI tools can create convincing sexual images by manipulating ordinary photographs or generating entirely synthetic material depicting a real child. Such imagery may cause significant distress, humiliation, bullying, blackmail, and reputational harm and may constitute child sexual abuse material or other criminal offending.

Any such incident should therefore be treated as a safeguarding concern and considered alongside Child-on-Child Abuse, Online Safety and Harmful Sexual Behaviour procedures.

Supporting Children

Children involved should be supported in a manner appropriate to their age, development, and circumstances.

Staff should avoid language which blames or shames a child for creating or sharing an image. A child who consensually created an image may subsequently become the victim of coercion, non-consensual sharing, bullying, or exploitation.

Support should consider:

- immediate emotional wellbeing and safety.
- risk of further sharing.
- peer response and bullying.
- online removal/reporting options.
- safeguarding risks beyond the image itself.
- relationships and coercion.
- SEND and communication needs; and
- whether additional pastoral, therapeutic or specialist support is required.

Where appropriate, children can be supported to use Report Remove, the Childline/IWF service for under-18s seeking removal of sexual images of themselves online.

Recording

The DSPL/DDSL will ensure that incidents are recorded appropriately, including:

- the nature and context of the concern.
- children involved.
- risk assessment.
- decisions made.
- whether police, Children's Social Care or other agencies were consulted.
- actions taken and not taken.
- the rationale for decisions; and
- outcomes and support provided.

The imagery itself should not normally be copied into the safeguarding record.

Prevention and Education

Children/learners should receive developmentally appropriate education through RSE, PSHE and online safety about:

- consent and healthy relationships.
- requests for intimate images.
- coercion and pressure.
- non-consensual image sharing.
- sexual harassment.
- online grooming and sextortion.
- AI-generated and manipulated sexual images.
- consequences of forwarding images.
- how to seek help; and
- how to report or seek removal of images.

Preventative education should avoid implying that children are responsible for preventing abuse committed against them.

Further Guidance:

Sharing nudes and semi-nudes: advice for education settings

Appendix 18 – Additional Resources

Further advice, guidance and resources relating to safeguarding and child protection are available from

NSPCC – safeguarding information, resources and advice for professionals, parents/carers, and children.
[NSPCC](#)

Childline – free, confidential information, advice and support for children and young people.
[Childline](#)

Anti-Bullying Alliance – information, training, and resources to prevent and respond to bullying.
[Anti-Bullying Alliance](#)

Childnet International – online safety information and resources for children, professionals, and parents/carers.
[Childnet International](#)

CEOP Education – online safety education and resources for professionals, children, and parents/carers.

UK Safer Internet Centre – online safety information, guidance, and resources, including resources for schools, SEND, and professionals.
[UK Safer Internet Centre](#)

DfE – Filtering and Monitoring Standards for Schools and Colleges
[Meeting digital and technology standards in schools and colleges – Filtering and Monitoring](#)

From Harm to Hope: A 10-year drugs plan to cut crime and save lives
[From Harm to Hope – GOV.UK](#)

Shore – confidential and anonymous support and information for teenagers worried about sexual behaviour.
[Shore](#)

Anna Freud – mental health information, research, training and resources relating to children and young people.
[Anna Freud](#)

Additional Online Safeguarding Resources

Report Remove – Childline / Internet Watch Foundation (IWF)

A free service for children and young people under 18 in the UK to confidentially report sexual images or videos of themselves that have been shared online and seek their removal. Children can also access support from Childline throughout the process.

[Report Remove – Childline](#)

Professionals Online Safety Helpline – UK Safer Internet Centre

Free, independent advice for professionals and volunteers working with children and young people who are dealing with online safety or online safeguarding concerns.

[Professionals Online Safety Helpline](#)

Appropriate Filtering and Monitoring – UK Safer Internet Centre

Guidance for education settings on establishing appropriate levels of filtering and monitoring. The 2026 guidance reflects emerging technology and considers dynamic and AI-generated content, mobile devices and apps, real-time filtering, monitoring and the technical limitations of systems.

Appropriate Filtering and Monitoring – UK Safer Internet Centre

DfE Filtering and Monitoring Core Standard It was updated in June 2026 and now explicitly asks schools to consider generative AI, dynamic and personalised content, SEND, BYOD and the limitations of filtering and monitoring technology.

DfE Filtering and Monitoring Core Standard

Educate Against Hate

Department for Education and Home Office resources to help education settings safeguard children from radicalisation and extremism, also contains resources relating to Prevent, misogyny, misinformation and disinformation, online safety, fundamental British values, SEND, prejudice, and hate.

Educate Against Hate

CEOP Safety Centre – National Crime Agency

Information and reporting routes relating to online child sexual abuse and exploitation, including grooming, sexual coercion and blackmail, requests for sexual images and other concerning online sexual contact. Children and young people can also make reports to CEOP.

CEOP Safety Centre

AI and Emerging Technology

UK Safer Internet Centre – AI Resources for Education

Resources for schools and education professionals relating to the safe and responsible use of artificial intelligence, including age-specific materials, online safety, and safeguarding considerations.

AI and online safety resources

AI-Generated Child Sexual Abuse Material – Professional Guidance

The UK Safer Internet Centre signposts professional guidance developed by the Internet Watch Foundation in collaboration with the National Crime Agency on understanding and responding to AI-generated child sexual abuse material.

IWF professional resource on AI-generated child sexual abuse material

Image Security and AI Manipulation

The UK Safer Internet Centre guidance following incidents where images of learners obtained from school websites were manipulated using AI to create sexual abuse material. This is particularly useful for schools when reviewing policies on publishing learner photographs and videos.

Image security guidance for schools