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## Safeguarding and Child Protection Policy and Procedures

This policy must also be read in conjunction with the Statutory Framework for the Early Years Foundation Stage (EYFS 2025). The DSL and DDSL for Early Years ensure that safeguarding and welfare requirements specific to EYFS are fully met, including safer recruitment, staff ratios, supervision, and safeguarding training.

This child protection and safeguarding policy sets out the school's expectations across the whole school. This policy is applicable for all children including those in the EYFS. It should be read in conjunction with:

Early Years Policy	Positive Behaviour Policy	Recruitment Policy
Equal Opportunities & Inclusion Policy	Anti-Bullying Policy	Professional development
	PSHE and RSE Policy	Security Policy and Procedures
SEND Policy	Wellbeing & Mental Health Policy	Staff Code of Conduct
Care and Supervision Policy	ICT Acceptable Use & Online safety	Staff discipline and grievance
Allergies Policy	Social Media Policy	Health and Safety Policy
Risk Assessment	Attendance Policy	Whistle blowing Policy
Educational Visits and Outings Policy		Data Protection Policy

This policy is available on the school website and a printed copy can be made available via the school office. It reflects Trafford Strategic Safeguarding Partnership Multi-agency safeguarding arrangements. In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

Keeping Children Safe in Education (September 2025) – KCSIE 2025
Equality Act 2010
Education Act 2002 (section 175)
The Children Act 2004
<b>Trafford Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures</b>
Information Sharing Advice for practitioners providing Safeguarding Services (May 2024) <a href="#">Information Sharing 2024</a>
Working Together to Safeguard Children (Dec 2023) <a href="#">WTSC 2023</a>
The Education (Pupil Information) (England) Regulations 2005



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Counter Terrorism & Security Act - Prevent Duty Guidance for England and Wales (March 2015)
The Prevent Duty: Departmental Advice for Schools and Childminders (Dec 2023) <a href="#">Prevent Duty 2023</a>
The Use of Social Media for On-Line Radicalisation (July 2015)
Independent Schools Regulations 2014 (ISSRs)
Working Together to Improve School Attendance (2024)
ISI Commentary on the Independent School Regulations (Sept 2022)
What to do if you are worried a child is being abused – Advice for practitioners (March 2015)
Teaching online Safety in Schools (June 2019)
Sexting in schools and colleges: responding to incidents and safeguarding young people (2017)
Children Missing in Education statutory Guidelines for Local Authorities (Sept 2016)
Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (2019).

### Key School Contact Details

Designated Safeguarding Lead (DSL): Mrs Sophie Hughes	<a href="mailto:shughes@bowdonprep.org.uk">shughes@bowdonprep.org.uk</a>
Deputy Designated Safeguarding Lead (DDSL): Mrs Sara Makepeace-Taylor	<a href="mailto:head@bowdonprep.org.uk">head@bowdonprep.org.uk</a> (tel. 07710 505678)
Deputy Designated Safeguarding Lead (DDSL): Mrs Carol Delf	<a href="mailto:cdelf@bowdonprep.org.uk">cdelf@bowdonprep.org.uk</a>
Deputy Designated Safeguarding Lead Early Years: Mrs Georgie Oakley	<a href="mailto:goakley@bowdonprep.org.uk">goakley@bowdonprep.org.uk</a>
Deputy Designated Safeguarding Lead for Out of School Care (DDSL): Mrs Heather Odiowei	<a href="mailto:hodeowei@bowdonprep.org.uk">hodeowei@bowdonprep.org.uk</a>
Safeguarding Governor: Mrs Nicola Tighe	<a href="mailto:bursar@bowdonprep.org.uk">bursar@bowdonprep.org.uk</a>
Senior Mental Health Lead: Mrs Sara Makepeace-Taylor	<a href="mailto:head@bowdonprep.org.uk">head@bowdonprep.org.uk</a>
Mental Health First Aider: Mrs Emma Hunter & Miss K Powell	<a href="mailto:office@bowdonprep.org.uk">office@bowdonprep.org.uk</a> or <a href="mailto:kimpowell@bowdonprep.org.uk">kimpowell@bowdonprep.org.uk</a>
Chair of Governing Body: Mrs Mina Kawasaki	<a href="mailto:chair@bowdonprep.org.uk">chair@bowdonprep.org.uk</a>

### Key External Contact Details

Trafford Children's First Response	0161 912 5125 <a href="mailto:firstresponse@trafford.gov.uk">firstresponse@trafford.gov.uk</a>
Emergency Duty Team (Out of Hours)	0161 912 2020
Greater Manchester Police	101 (non emergency) 999 (emergency)
Trafford Strategic Safeguarding Partnership	Trafford Personal Advisor



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Trafford Local Authority Designated Officer (LADO): Anita Hopkins	0161 912 5024. email: <a href="mailto:anita.hopkins@trafford.gov.uk">anita.hopkins@trafford.gov.uk</a>
NSPCC	0808 800 5000
NSPCC Whistle Blowing Advice	0800 0280285 email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> <a href="http://www.nspcc.org.uk">NSPCC website</a>
Childline	0800 11 11 <a href="http://www.childline.org.uk">www.childline.org.uk</a>
Independent Schools Inspectorate	0207 6000100 <a href="http://www.isi.net/parents-and-pupils/concerns-about-a-school">www.isi.net/parents-and-pupils/concerns-about-a-school</a> email: <a href="mailto:concerns@isi.net">concerns@isi.net</a>
Teaching Regulation Agency	02075935393 <a href="http://www.gov.uk/report-teacher-misconduct">www.gov.uk/report-teacher-misconduct</a> email: <a href="mailto:misconductteacher@education.gov.uk">misconductteacher@education.gov.uk</a>
UK Council for Child Internet Safety Guidance	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_293_9_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_293_9_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf</a>
Trafford Children Social Care Protocol of Assessment	<a href="http://www.proceduresonline.com/trafford/cs/chapters/p_assessment.html">www.proceduresonline.com/trafford/cs/chapters/p_assessment.html</a>
Trafford Multi-Agency Safeguarding Arrangements	TSSB-multiagency-arrangements ( <a href="http://traffordsafeguardingpartnership.org.uk">traffordsafeguardingpartnership.org.uk</a> )
To discuss concerns about a child at risk of radicalisation contact one of the following:	
Trafford Children and Young People Vulnerable to Violent Extremism: Liz Baxter	<a href="mailto:liz.baxter@trafford.gov.uk">liz.baxter@trafford.gov.uk</a>
Concerns relating to extremism (DFE)	020 7340 7264 email: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>
Radicalisation - Channel (Trafford)	0161 856 6362 Ext 66373 email: <a href="mailto:channel.project@gmp.police.uk">channel.project@gmp.police.uk</a>
Greater Manchester Police Prevent Team	0161 856 6345. Call anonymously on 0800 789 321.
National Anti-Terrorist Hotline	0800 789321

## Monitoring the Effectiveness of the Policy and Procedures

An annual report and audit is completed during the first stage of the autumn term, which is reviewed by the Governor responsible for safeguarding.

### Review of policy

All members of staff and Governors will receive a copy of this policy. Copies may be reviewed by parents. This policy will be reviewed, evaluated and updated as required and formally on an annual basis to assess its relevance and effectiveness. It is reviewed and updated with contribution from all staff with experience and responsibility for safeguarding.

Date of update	(U) Updated (R) Reviewed by	How was updated disseminated	Parents informed	Policy on website	Gov Approve d
Sept 2025	S Hughes (R & U)	Staff training – INSET. Staff email	Yes	Yes	Yes

## Keeping Children Safe in Education - KCSIE - What's Changing in 2025:

<b>Attendance</b>	Now statutory; daily registers and action on persistent absence
<b>Online Safety</b>	Expanded to new content risks (e.g. misinformation); enhanced filtering, AI & cybersecurity focus
<b>Alternative Provision</b>	Written safeguarding assurances and frequent AP placement reviews mandated
<b>Virtual School Heads</b>	Extended role to kinship care
<b>SEND Terms</b>	Updated to align with SEND Code
<b>RSHE &amp; Gender Guidance</b>	New signposts expected in September version
<b>Minor Updates</b>	Recruitment links, annex titles, "Shore" resource added
<b>Future Updates</b>	Annex F signals upcoming legislative & inquiry changes

## Bowdon Prep's Safeguarding Statement

Bowdon Preparatory School is committed to providing a safe, caring, and inclusive environment where all pupils can thrive. Safeguarding is central to our ethos, and all members of the school community share responsibility for promoting the welfare of children.

Safeguarding at Bowdon Prep goes beyond policy; it is embedded in our school culture. All staff, pupils, and visitors are expected to be vigilant, supportive, and respectful of others. While safeguarding procedures guide practice, we strive to uphold our values in all interactions.

The school's **Safeguarding and Child Protection Policy** is reviewed annually—or earlier if legislation changes—and is available to staff via the intranet and to parents and pupils via the school website. All

staff (teaching, non-teaching, part-time, supply, governors, volunteers, and contractors) are required to read and implement the policy. It also applies to parents on school premises or involved in school matters, and to residents or visitors in staff accommodation connected to the school.

The **Governing Body and staff** recognise that safeguarding is everyone's responsibility. The school promotes pupils' physical, mental, and emotional wellbeing and provides a stable, secure environment—especially for those at risk of harm. A positive safeguarding culture encourages staff, parents, and pupils to raise concerns, knowing they will be taken seriously.

Discrimination is not tolerated. The school respects the dignity, privacy, and beliefs of all, regardless of gender, race, culture, religion, caste, sexual orientation, or disability. Every child has the right to protection from abuse and equal access to support.

All staff must report any concerns of actual or suspected abuse or neglect to the **Designated Safeguarding Lead (DSL)**, a senior member of staff with the authority to act. **Deputy DSLs** are also appointed to ensure a trained safeguarding lead is always available during school-led activities, including extracurricular provision and out-of-term time clubs.

The school has clear, accessible systems in place for children to report concerns safely and confidently. A child's wishes and feelings are always considered when deciding actions and support.

In an emergency or if a child is in immediate danger, the school will contact the police via **999**.

The school uses **Trafford's Early Help Assessment** when engaging external services to support children and families. Where appropriate, we coordinate a **Team Around the Family** approach to ensure consistent multi-agency support. We meet our duties to both children in need and those at risk of significant harm.

## Definition of Safeguarding 2025

This is now in line with the Working Together to Safeguard Children 2023 guidance:

1. Providing help and support to meet the needs of children as soon as problems emerge.
2. Protecting children from maltreatment, whether that is within or outside the home, including online.
3. Preventing the impairment of children's mental and physical health or development.
4. Making sure that children grow up in circumstances consistent with the provision of safe and effective care.
5. Taking action to enable all children to have the best outcomes.

## Aims and Objectives of Safeguarding Practice at Bowdon Prep School

Bowdon Prep aims to:

- Work effectively with external agencies, including the Police, Social Care, and Channel, to safeguard pupils and prevent terrorism.

- Ensure all staff with access to children are appropriately vetted, including identity verification (see Safer Recruitment Policy).
- Prevent abuse through effective teaching and strong pastoral care.
- Provide support for pupils who have experienced abuse.
- Maintain staff awareness through ongoing training on key issues such as child sexual exploitation, sexual violence, criminal exploitation, radicalisation, child marriage, FGM, and child-on-child abuse.
- Ensure **all staff** receive statutory safeguarding training, are aware of who the Safeguarding Team are
- All staff have read Part 1 of KCSIE 2025, or Annex A as a condensed version, if they don't work directly with children
- Ensure governors receive safeguarding and child protection training at induction and regular intervals to support effective oversight of policies and procedures.

### The Duties of the School

Bowdon Prep will:

- Annually review and update the child protection policy with the Governing Body; make it publicly available and ensure parents understand the school's duty to refer safeguarding concerns.
- Liaise with Trafford LSCB to access training, follow local safeguarding procedures, and ensure staff awareness.
- Transfer child protection files securely and separately when pupils move schools, with the DSL sharing relevant information with the receiving school.
- Follow safer recruitment procedures in line with statutory guidance, ensuring all staff, governors, and volunteers are appropriately vetted.
- Provide a Staff Code of Conduct, Whistle Blowing Policy, and Acceptable Use of ICT policies for staff and pupils.
- Appoint a Designated Safeguarding Lead (DSL) to lead safeguarding, support staff, and liaise with Trafford First Response and the LADO.
- Maintain a policy for managing allegations against staff, volunteers, and the Headteacher.
- Train staff regularly to recognise abuse, neglect, and medical emergencies (e.g. asthma, anaphylaxis).
- Promote a child-centred approach: active listening, empathy, emotional regulation, and clarity between fact and opinion.
- Identify and support children who may need early help, especially those at risk of exclusion, with parents in custody, affected by parental offending, or frequently missing.
- Teach safeguarding, including online safety, through the curriculum.
- Vet all visiting speakers through references, testimonials, and online checks

### Prevent Duty:

As part of our safeguarding responsibilities, we follow the **Prevent duty** set out in the **Counter-Terrorism and Security Act 2015** and the updated statutory guidance (2023).

This requires schools to help protect children from the risk of radicalisation and being drawn into terrorism. In line with (KCSIE) 2025, Prevent is not a separate policy but part of our wider safeguarding

approach. We regularly assess risks, provide staff with training to recognise concerns, and follow the “notice, check, share” approach to ensure any worries are raised quickly. Where needed, referrals are made through established safeguarding channels, including the **Channel programme**, so that children and families can access early help and support.

The school will:

- Ensure all staff complete Prevent awareness training and understand how to recognise and refer concerns related to radicalisation.
- Build pupils’ resilience to extremist narratives through the promotion of fundamental British values and a broad, balanced curriculum.
- Refer concerns to the DSL, who will liaise with Trafford’s Channel Panel and safeguarding partners where appropriate.
- Regularly review online safety and filtering systems to reduce the risk of access to extremist or harmful content.

#### **Governance and Safeguarding at Bowdon Prep School:**

The Governing Body ensures robust safeguarding through an effective child protection policy and a clear staff behaviour policy (code of conduct). A senior member of staff must be appointed as the Designated Safeguarding Lead (DSL), with sufficient authority and resources to lead safeguarding effectively.

Key responsibilities of the Governing Body include:

- Contributing to inter-agency working, including coordinated early help when children's additional needs are identified.
- Ensuring the implementation of child protection and staff behaviour policies.
- Appointing a DSL and Deputy DSL team (DDSL), all of whom must complete annual child protection training.
- Prioritising pupil welfare and fostering a culture where staff feel confident to challenge senior leaders on safeguarding concerns.
- Taking a proportionate, risk-based approach to sharing safeguarding information with temporary staff, volunteers, and contractors.
- Ensuring pupils are taught how to keep themselves safe.
- Maintaining child protection records as outlined in Annex C of *KCSIE 2025*.
- Embedding safer recruitment practices, including informing applicants that online searches will form part of due diligence, in line with *KCSIE 2025*.
- Holding more than one emergency contact number per pupil where reasonably possible.


The Safeguarding Governor should focus on filtering and monitoring systems, without needing technical expertise.

## The Role of the Designated Safeguarding Lead (DSL)

### Who is the DSL?

The **DSL** is a senior leader responsible for overseeing safeguarding and child protection. Staff must report **all concerns** to the DSL or Deputy DSL. In urgent cases, any staff member can also contact:

 **Trafford Children's First Response:** 0161 912 5125

 **Online Referral Form:** via Trafford Council website

### DSL Responsibilities

#### 1. Managing Referrals

The DSL promptly refers cases to:

- **Children's First Response** (suspected harm or risk)
- **LADO** (allegations against staff)
- **Police** (if a crime may have occurred)

The DSL informs the **Headteacher** of significant concerns and supports staff with referral decisions

#### 2. Multi-Agency Working

The DSL coordinates and represents the school at:

- Early Help (Team Around the Family) meetings
- Child in Need and Child Protection Conferences
- Social Care Strategy meetings

They submit written reports and ensure the school contributes to any child protection or support plans

#### 3. Decision-Making

On receiving a concern, the DSL determines whether:

- It meets the threshold for external referral
- It should be addressed through **Early Help** (Level 2 support)
- A **school-based response** is sufficient

#### 4. Record-Keeping and Holding & Sharing Information

The DSL will:

- Maintain **detailed, accurate, and secure records** of concerns, actions, and referrals to support safeguarding and enable effective multi-agency working.



- Document the rationale for all decisions.
- Understand the importance of **timely and appropriate information sharing** within school, between schools (e.g. at transfer), and with safeguarding partners and agencies.
- Comply with the **Data Protection Act 2018, UK GDPR**, and guidance in *KCSIE 2025* (Parts 1, 2, and 5).

## 5. Training & Policy Implementation

The DSL, with support from the DDSLs:

- Receives **annual training, including PREVENT training**
- Ensures staff understand and follow the school's **safeguarding policies**
- Raises awareness of the needs of vulnerable pupils (e.g., SEND, young carers)
- Promotes a culture where staff **listen to and act on pupil voice**

## 6. Supporting Educational Outcomes

The DSL shares relevant welfare information with teachers and leaders to support:

- Pupil progress and attendance
- Pupils with a **social worker** or wider safeguarding concerns

## 7. Availability

A DSL or Deputy is always available during school hours. In exceptional cases, remote attendance (e.g., Zoom/TEAMS) may be arranged.

## Early Years Safeguarding

In our Early Years provision, safeguarding and child protection are paramount. We follow the **Statutory Framework for the Early Years Foundation Stage (EYFS, 2025)** and **Keeping Children Safe in Education (KCSIE, 2025)**.

- A **Designated Safeguarding Lead (DSL)**, and trained deputy, are always available during EYFS hours.
- Staff are trained to understand the specific safeguarding needs of very young children, including recognising signs of abuse or neglect when children may be unable to communicate concerns.
- At least one member of staff with a current **paediatric first aid** certificate is present on site at all times.
- **Safer recruitment practices** and statutory staff–child ratios are strictly maintained.
- **Staff allegations:** Any concerns or allegations against staff are managed in line with statutory guidance, referred immediately to the Headteacher and the Local Authority Designated Officer (LADO), with safeguarding prioritised while investigations take place.
- **Pupil absence:** All absences are followed up promptly. Unexplained, repeated, or concerning patterns of absence are treated as safeguarding issues and reported in line with local procedures.

- **Food requirements and allergies:** All dietary needs, medical conditions, and allergies are recorded, regularly reviewed, and clearly communicated to staff. Strict procedures are in place to ensure meals and snacks are prepared and served safely, with allergy awareness embedded in daily practice to prevent risk of harm.
- Mobile phone, camera, and online safety procedures are in place to protect children's privacy.
- We work closely with parents, carers, and external agencies to promote children's welfare, ensuring swift action is taken when concerns arise.

This ensures that safeguarding in the Early Years is fully embedded within the school's wider safeguarding framework, while addressing the particular needs of our youngest pupils.

#### **Bowdon Prep's Child Protection Procedures** (Included in a handout to all staff)

#### **IMMEDIATE PRIORITY: Is the child in immediate danger?**

If **yes**, contact:

- **Designated Safeguarding Lead (DSL) or Deputy DSL** *immediately*.
- If DSL is unavailable and child is at risk of significant harm, **call 999** or **Children's Services**.

#### **Recognise a Concern**

Staff may notice or be involved with:

- A disclosure by the child
- Changes in behaviour or appearance
- Attendance issues
- Unexplained injuries or frequent absences
- Concerning comments made by the child or others

#### **DO:**

- Stay calm and listen carefully.
- Take the disclosure seriously.
- Reassure the child that they've done the right thing and are not at fault

#### **DO NOT:**

- Promise confidentiality.
- Ask leading questions.
- Investigate the concern yourself.
- Share your personal thoughts and feelings about the alleged perpetrator

#### **Report Immediately to the DSL**

Verbally inform the **Designated Safeguarding Lead (DSL)** or their deputy **as soon as possible — before the end of the day.**

### **Record the Concern on CPOMS**

Use CPOMS (Child Protection Online Management System) to formally log your concern.

#### **CPOMS Entry: Step-by-Step**

1. **Log in** to your school's CPOMS portal.
2. Click **'Add Incident'**.
3. Complete the form, including:
  - **Date/time** of incident or disclosure
  - **Exact words** used by the child (where possible)
  - **Factual, objective information** only (avoid assumptions)
  - **Actions taken** (e.g., reported to DSL)
  - Attach any relevant documents or photos if appropriate
4. **Select category** (e.g., Child Protection, Behaviour, Medical, etc.)
5. **Tag relevant staff**, including DSL and deputies
6. Click **'Submit Incident'**



**Good practice:** Write in clear, professional language. Always include:

- Who was present
- What was said and by whom
- Body language or emotional state of child

### **DSL to Review and Take Action**

The DSL will:

- Review your report
- Cross-reference with any existing concerns
- Decide on the next steps, which may include:
  - Speaking with the child or family
  - Monitoring the child
  - Making a referral to **Children's Social Care**
  - Contacting external safeguarding professionals

### **DSL to Record Actions on CPOMS**

DSL must:

- Log any actions or referrals taken
- Record ongoing monitoring
- Update CPOMS with decisions and outcomes
- Keep all information secure and confidential

### **Ongoing Monitoring and Support**

The school will:

- Monitor the child as appropriate
- Offer pastoral or academic support
- Update records accordingly
- Communicate with external agencies, if required

### **! Key Reminders**

- **Every concern must be recorded** — even small ones.
- **Never delay** reporting a concern because you are unsure.
- CPOMS is a **secure and confidential system** — only trained staff can access safeguarding categories.
- If in doubt, **consult the DSL**.

To maintain a culture of openness, trust and transparency, all staff must feel confident to report any behaviour—no matter how minor—that may raise a concern about an adult working in or on behalf of the school.

### **What is a Low-Level Concern?**

A **low-level concern** is any behaviour by a staff member, volunteer, contractor, or supply staff that:

- **Does NOT meet the harm threshold** (i.e. does not require LADO referral), but is inconsistent with the Staff Code of Conduct, including behaviour outside work.

Examples may include:

- Over-friendly behaviour towards pupils
- Having favourites
- Taking photos of children on a personal device
- One-to-one situations behind closed doors
- Inappropriate language or tone

Such concerns may be subtle or seem minor but must still be reported.

### **When DOES a Concern Meet the Harm Threshold?**

Refer to the **Headteacher immediately** if an adult has:

- Harmed or may have harmed a child
- Possibly committed a criminal offence
- Posed a risk of harm to children
- Acted in a way that suggests unsuitability to work with children (even outside school)

These cases follow the "**Allegations Regarding Staff**" procedures in the Safeguarding Policy (Appendix D) and may involve the LADO.

### **What Should Staff Do if They Have a Low-Level Concern?**

#### **Step 1: Share the Concern Promptly**

- **Speak to the Headteacher** as soon as possible.
- Self-refer if you reflect on your own actions and feel they may have fallen short of professional standards.

#### **Step 2: Record the Concern in Writing**

The record should include:

- Details and context of the concern
- Who was involved or witnessed it
- Action taken
- Your name (or anonymous if preferred)

If shared verbally, the **Headteacher will record it** and date/sign the record.

### **How Will the School Respond?**

The **Headteacher will:**

- Confirm if it is a low-level concern or needs to be escalated
- Investigate by speaking to those involved (where needed)
- Keep a **written record** with rationale and action taken

Depending on severity, actions may include:

- A reflective conversation
- Advice/guidance
- Training
- Monitoring
- In rare cases: disciplinary or capability procedures

Contractor/supply staff concerns will be reported to their employer.

### **Confidentiality & Monitoring**

- Concerns are stored **confidentially** (not in staff files unless formal action is taken).
- A **central log** is reviewed monthly by SLT to monitor for patterns or recurring concerns.

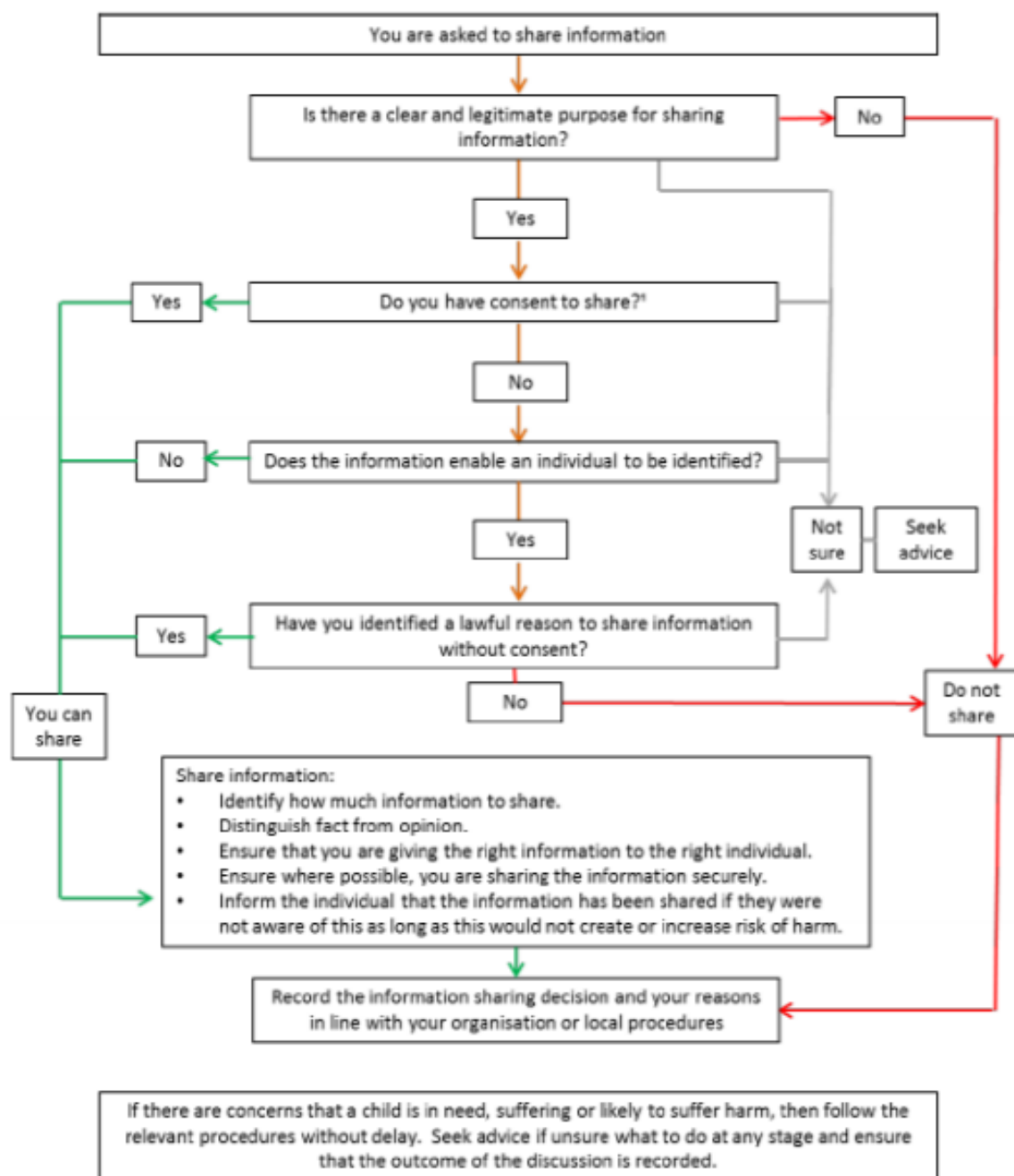
### **Concerns About the Headteacher**



Report directly to the **Chair of Governors** (see key school contacts at the beginning of this policy)

## APPENDIX A

### Flowchart of when and how to share information

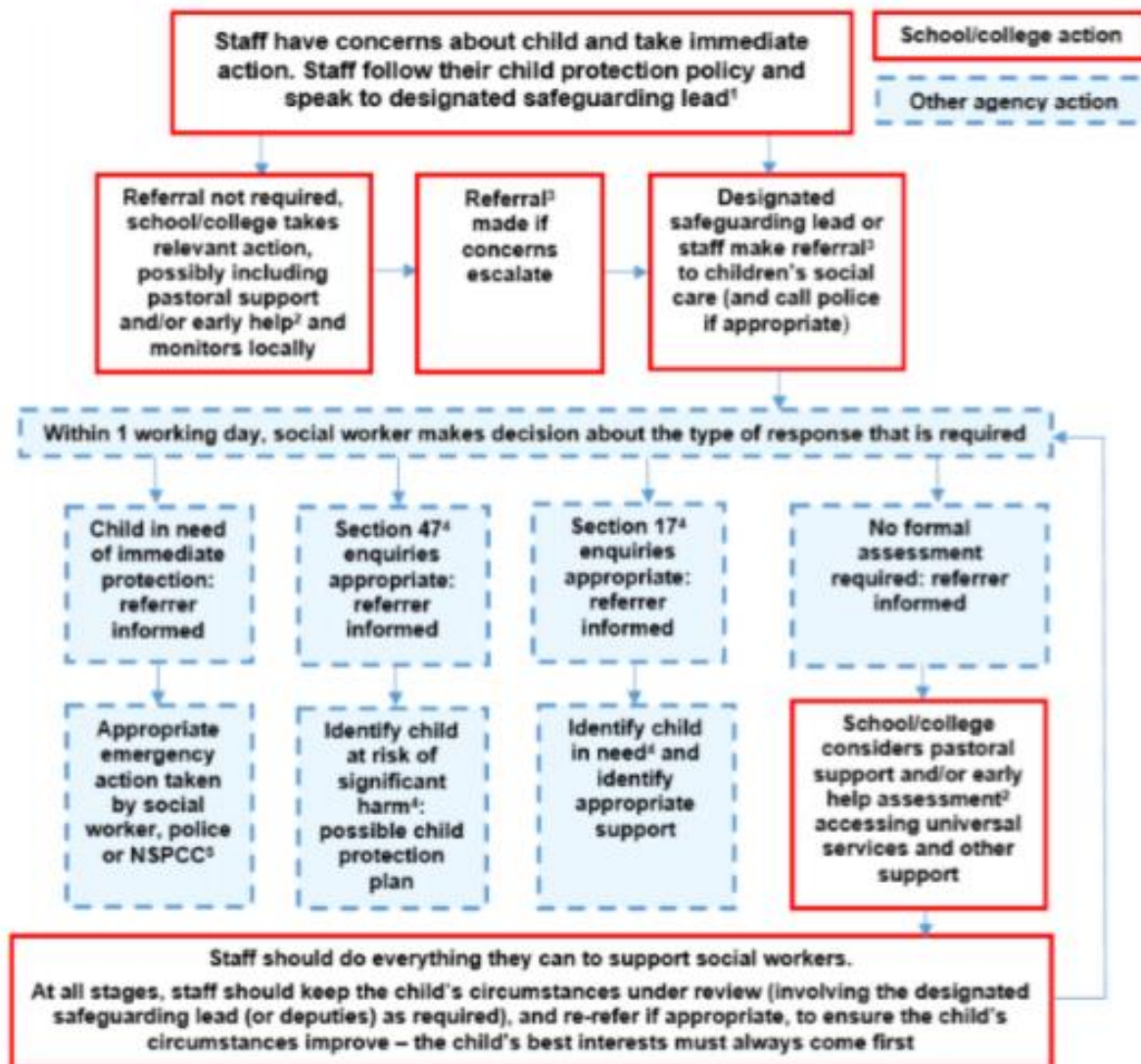


1. Consent must be unambiguous, freely given and may be withdrawn at any time



## APPENDIX B

### Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).



## APPENDIX C

### Additional risks

#### Susceptible Children

Bowdon Prep School recognises its duty under *Keeping Children Safe in Education (KCSIE 2025)* to provide additional safeguarding support to susceptible children. This includes those with a social worker (e.g. on a Child Protection Plan, Child in Need Plan, or looked-after) and those up to age 25 with an Education, Health and Care (EHC) plan.

The Headteacher, DSL, and DDSLs maintain oversight of all susceptible pupils and can offer early support to those on the edge of social care involvement.

– *Working Together to Improve School Attendance (2024)* is formally recognised in KCSIE 2025, with updates stating that attendance is now statutory. Schools must submit daily attendance registers and should trigger safeguarding referrals for persistent absence.

The school encourages attendance—either remotely or in person—based on individual circumstances. Where physical attendance is appropriate, any underlying health risks will be assessed in consultation with the child’s social worker and in line with Public Health England guidance.

If a parent of a vulnerable child is reluctant for them to attend, the school will work with the social worker to explore concerns and agree safeguarding arrangements.

All professionals involved (e.g. social workers, SEND caseworkers, Early Help) will be kept informed of the child’s attendance and any safeguarding measures in place.

#### Safeguarding Training

All staff at Bowdon Prep School have read **Part 1 of Keeping Children Safe in Education (KCSIE 2025)**. The **Designated Safeguarding Lead (DSL)** shares any updates to local safeguarding arrangements, ensuring all staff know how to respond to concerns about a child. All staff receive annual safeguarding training ready for the new academic year, which also includes any new updates and legislation. Online training is completed through The Safeguarding Training Company.

When the **Safeguarding Policy** is updated, all staff must confirm they have read and understood the revised version.



New staff and volunteers receive safeguarding induction, delivered in person. They will receive a copy of the school's safeguarding policy, our school procedures, and the contact details of the safeguarding team.

### **Safer Recruitment/Volunteers**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the school will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in Part 3 of KCSIE 2025 which includes informing candidates that online searches will be carried out as part of due diligence.

Where volunteers are deployed, the school will continue to follow the checking and risk assessment process as set out in the relevant sections of KCSIE (2023). Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity. The school will continue to follow its legal duty to refer to the DBS where appropriate, in line with advice from the LADO, anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

It is essential from a safeguarding perspective that the school is aware, on any given day, which staff / volunteers will be in school, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the school will continue to keep the single central record (SCR) up to date as outlined in the relevant section of KCSIE. The SCR can also be used to log details of any risk assessments carried out on volunteers.

Volunteers and visitors who have had the relevant DBS checks and are clear to be in the presence of children without supervision must wear a **GREEN** visitors pass. Anyone who has not had the relevant checks must wear a **RED** visitors badge, indicating that they are not permitted to be left with children in school unsupervised.

### **Filtering, Monitoring, and Online Safety**

The school is committed to ensuring a safe online environment. All school-related digital activity must take place via secure, school-managed platforms, with appropriate filtering, monitoring, and supervision in place. Online safety procedures are detailed in the **Online Safety Policy**. The online risks have now been expanded within KCSIE 2025 and explicitly names **misinformation, disinformation, and conspiracy theories** as safeguarding concerns.

### **Roles and Responsibilities:**

The **Designated Safeguarding Lead (DSL)**, in collaboration with **IT Support** and the **Head of ICT**, oversees all filtering and monitoring procedures. This includes:

- Reviewing filtering and monitoring systems (e.g. Sophos)
- Acting on safeguarding concerns
- Conducting regular checks and reviews
- Ensuring annual evaluation of system effectiveness

- Documenting decisions regarding allowed or blocked content

## **Staff Responsibilities**

Staff must:

- Be aware of their role in online safety
- Complete appropriate training
- Follow all school policies and procedures
- Report concerns, including:
  - Access to inappropriate content
  - Potential over-restriction
  - Unusual spikes in monitoring logs
  - Attempts to bypass filters (e.g. through slang, abbreviations, or other languages)
  - Any required access to blocked educational content

## **Filtering and Monitoring**

Filtering should prevent access to harmful material without disrupting teaching, learning, or administrative tasks. As no system is fully effective, active **monitoring**—including software logs, physical supervision, and device checks—is essential.

## **APPENDIX D**

### **Managing Allegations Against Staff Policy**

This policy sets out procedures for managing allegations against adults working or volunteering in our school, in line with:

- The Children Acts 1989 & 2004
- Education Acts 2002 & 2011
- The Education (Independent School Standards) Regulations 2010
- KCSIE 2025
- ISI regulatory requirements

**Note:** This policy applies to all adults working with pupils, including permanent, temporary, supply, contracted, and volunteer staff.

The **Staff Code of Conduct** and **Whistleblowing Policy** are separate documents.

## **2. Scope of Allegations**

This policy applies when an adult is alleged to have:

1. Harmed or potentially harmed a child.
2. Committed or possibly committed a criminal offence against a child.
3. Behaved in a way that suggests they may pose a risk to children.

These behaviours relate to:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

### 3. Core Principles

- The welfare of the child is paramount.
- Allegations will be handled fairly, promptly, and consistently.
- Staff subject to allegations will be supported and treated in accordance with employment law.
- No internal investigation will begin until agreed with the **LADO** (Local Authority Designated Officer) and/or Police.
- Confidentiality will be maintained wherever possible, in line with the **Education Act 2002** and legal reporting restrictions.

### 4. Roles and Responsibilities

- **Nominated Senior Manager (NSM):** Headteacher
- **Deputy NSM (in Head's absence):** Deputy Headteacher or DSL
- **For allegations against the Head:** Chair of Governors (contacted by the DSL)

The NSM liaises with:

- LADO
- Police (if required)
- Trafford First Response (0161 912 5125 or 0161 912 2020 out of hours)

### 5. Initial Actions

**Anyone receiving an allegation must:**

- Treat it seriously and avoid asking leading questions.
- Make a detailed written record (date, time, place, who was present, exact words).
- Report immediately to the Headteacher or Chair of Governors (if about the Head).

**The NSM will:**

- Report to the LADO within one working day.
- Agree on next steps, including informing the accused and parents (when appropriate).
- Record all decisions, discussions, and actions in writing.

### 6. Outcomes and Definitions

The outcome of an investigation will be classified as:

- **Substantiated** – Sufficient evidence the allegation is true.
- **False** – Sufficient evidence the allegation is untrue.
- **Malicious** – False with deliberate intent to deceive.
- **Unsubstantiated/Unfounded** – Insufficient evidence or mistaken identity.

## 7. Suspension

Suspension is **not automatic**. It is considered only if:

- A child may be at risk.
- The allegation may warrant police involvement or dismissal.
- Suspension is necessary to protect the integrity of the process.

Alternatives to suspension (e.g. redeployment, limited duties) will be considered first. Written confirmation will be provided within one working day, along with a named support contact (typically the Bursar).

## 8. Investigation Process

Depending on the LADO's advice, the next steps may include:

- Strategy meeting with external agencies.
- Internal disciplinary investigation (if criminal thresholds are not met).
- Referral to Police or Children's Social Care.
- No further action, with justification recorded.

Disciplinary processes will follow the school's policy:

- Internal investigations completed within 10 working days where possible.
- Disciplinary hearings held within 15 working days if required.

## 9. Conclusion of a Case

If substantiated:

- Referral made to **DBS** and/or **Teaching Regulation Agency (TRA)**.
- Report submitted to **ISI** (within 14 days) for EYFS cases involving serious harm.

If unsubstantiated or malicious:

- Allegation removed from records.
- Support offered for staff returning to work.
- Disciplinary action may be considered against a pupil making a malicious allegation.

Records of substantiated allegations are kept **indefinitely**. Malicious allegations are removed.

## 10. Supply Staff and External Hirers

- Allegations against supply staff are managed by the school, in consultation with the agency and LADO.
- Hirers of school premises must follow their own safeguarding procedures and inform the LADO of any allegations.
- All external providers must have an up-to-date DSL and suitable safeguarding training.

## 11. Historic Allegations

Any allegation against a former member of staff or former pupil over 18 should be reported immediately to the Headteacher, who will inform the Police.

## 12. Support for Involved Parties

### Accused Staff:

- Provided with information, updates, and support.
- Encouraged to contact a union or colleague.
- Assigned a named contact (usually the Bursar).

### Children and Parents:

- Medical support arranged where necessary.
- Informed appropriately about the allegation, process, and outcome (where allowed).
- Advised about confidentiality and reporting restrictions.

## APPENDIX E

Guidance to safeguard children and education staff with regard to situations which may lend themselves to allegations of abuse

### Physical Contact, Restraint & Intimate Care

#### Physical Contact

Staff must follow a **'limited touch' approach**, using physical contact only when:

- It meets a genuine need of the child at the time
- It is age-appropriate, brief, and non-intrusive

Physical contact must always be:

- Justifiable and professional
- Open to scrutiny
- Documented if frequent or planned (e.g. for SEND pupils)

Children with prior abuse may misinterpret physical contact. Extra care, professional boundaries, and the presence of another adult (where possible) are essential.

### **Comfort and Reassurance**

Staff may offer brief, appropriate comfort (especially in EYFS), avoiding any action that could be considered intimate.

Inappropriate contact initiated by a child should be gently redirected and reported to the **DSL**.

### **Restraint (Use of Reasonable Force)**

Restraint is only permitted to:

- Prevent harm to the child, others, or property and it must be proportionate and brief and never used as punishment.

All incidents must be **recorded and reported** in line with the school's **Positive Behaviour Policy**.

### **First Aid & Intimate Care**

Staff must:

- Respect the child's dignity and privacy
- Ensure another adult is present where possible
- Follow hygiene, safeguarding, and recording protocols

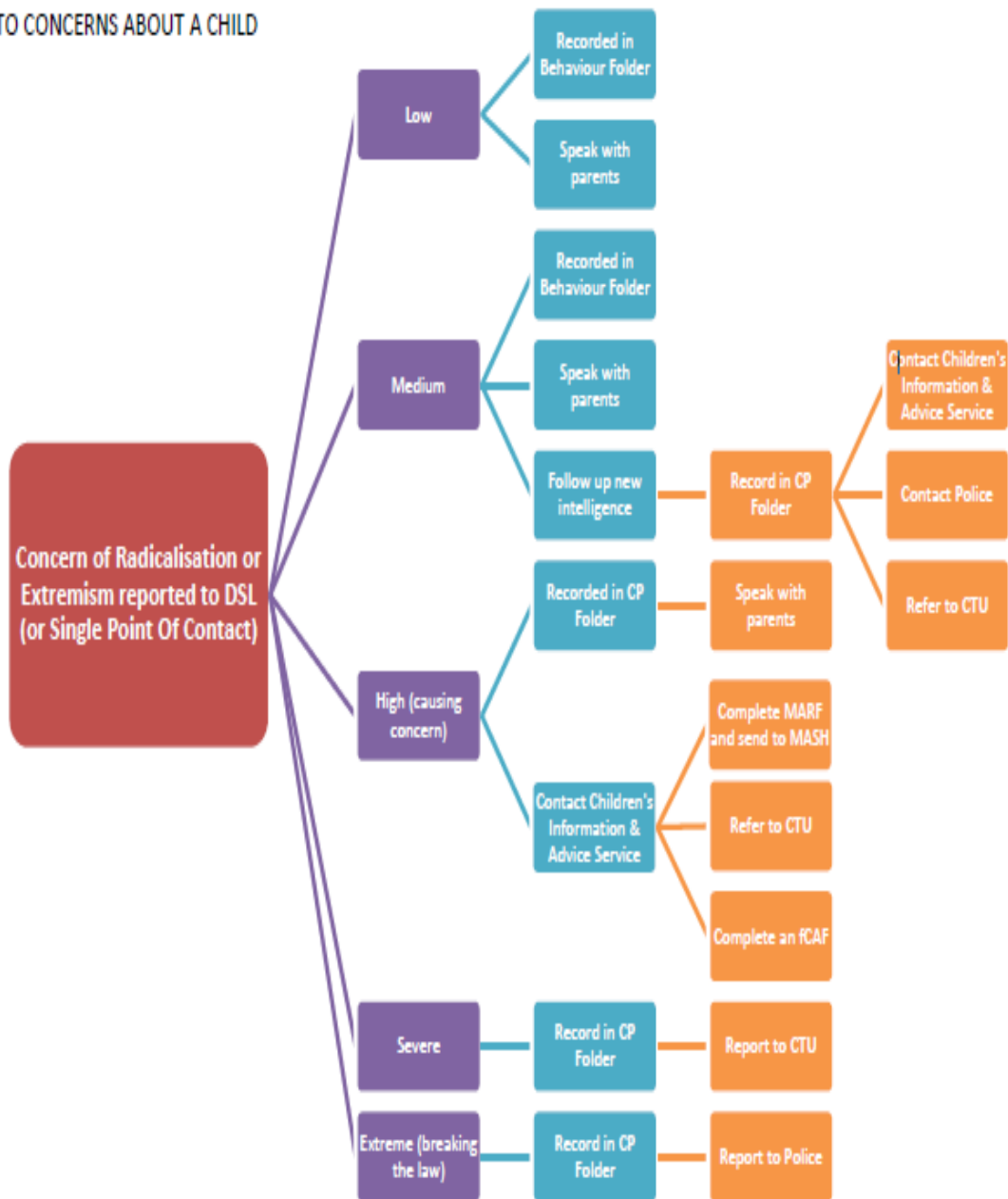
Support for SEND or intimate care must be documented, agreed with parents, and regularly reviewed.



**APPENDIX F** Anti-Radicalisation and Anti-Extremism Flow Chart.

# Anti-Radicalisation & Anti-Extremism Flow Chart

RESPONDING TO CONCERNS ABOUT A CHILD



## APPENDIX G

### Youth Produced Sexual Imagery (YPSI) Policy

#### 1. Key Principles

- All incidents must be taken seriously and dealt with in line with the **Child Protection Policy**.
- Children under 13 **cannot legally consent** to any sexual activity (Sexual Offences Act 2003).
- The **DSL must be informed immediately** of any concerns or disclosures.

#### 2. Initial Response

When an incident arises:

- Refer immediately to the **DSL**.
- DSL to conduct an **initial review**.
- Parents should be informed unless doing so puts the child at risk.
- Immediate referral to **Trafford Children's First Response** or **Police** if:
  1. An adult is involved.
  2. Coercion, grooming or capacity to consent is in doubt.
  3. Imagery is unusually explicit or violent.
  4. Any pupil is under 13.
  5. There is risk of significant harm (e.g. self-harm, suicidal ideation)

#### 3. Disclosures

Disclosures may come from:

- The young person.
- A peer, parent, or staff member.
- Anonymous or external sources.

All staff should be trained to **recognise and report** disclosures appropriately.

#### 4. Initial Review Meeting

Led by the DSL to assess:

- Any immediate risks.
- Whether to involve external agencies.
- Whether the image needs to be viewed (generally avoided).
- The spread of the imagery.
- Action needed to secure/delete content.
- Parental involvement.
- Need to contact other schools or settings
-



## 5. Risk Assessment

If not referred externally, the DSL must:

- Interview pupils involved.
- Consider coercion, sharing history, adult involvement, and impact.
- Assess understanding of consent and prior incidents.
- Keep all decisions under review and documented.

## 6. Informing Parents/Carers

Parents should be involved unless this would increase risk.

Where appropriate, DSLs may support pupils in informing parents themselves.

## 7. When to Involve the Police

Contact police via:

- Safer Schools Officer
- Local police (101)
- Neighbourhood or school-based support

**Note:** Any report made will initiate a formal investigation. Devices may be seized and interviews conducted.

## 8. Handling Devices & Imagery

- Devices should be **confiscated**, powered off, and locked securely until police collect them.
- **Staff should not view** imagery unless:
  - It's necessary to determine external referral.
  - A report to a website/app is required.
  - A student has shown it to staff or it's found on a school system.

If viewed:

- Only the DSL (or delegated safeguarding lead) may view.
- Another staff member should be present.
- No image may be copied, downloaded or shared.
- All viewing must be recorded, signed, and stored securely.

## 9. Deleting Imagery

- Preferable for pupils to delete imagery themselves (with confirmation and deadline).
- Staff can delete content only where there is **clear and lawful reason** to do so.
- All deletion actions must be documented.

## 10. Supporting Pupils

DSLs should:

- Focus on reassurance and support.
- Avoid accusatory language.
- Discuss consent, pressure, healthy relationships, and digital safety.
- Help pupils report content and remove it online.

## **11. Recording & Documentation**

All YPSI incidents must be recorded, including:

- Whether referrals were made (and if not, why).
- Decision-making, actions, conversations, and outcomes.
- Details of parent contact.
- How content was managed.
- Risk assessments and safeguarding measures.

Records must meet **ISI standards**:

- Complete, timely, and demonstrate risk management.
- Evidence of multi-agency working (if applicable).
- Secure and transferable if the pupil leaves.

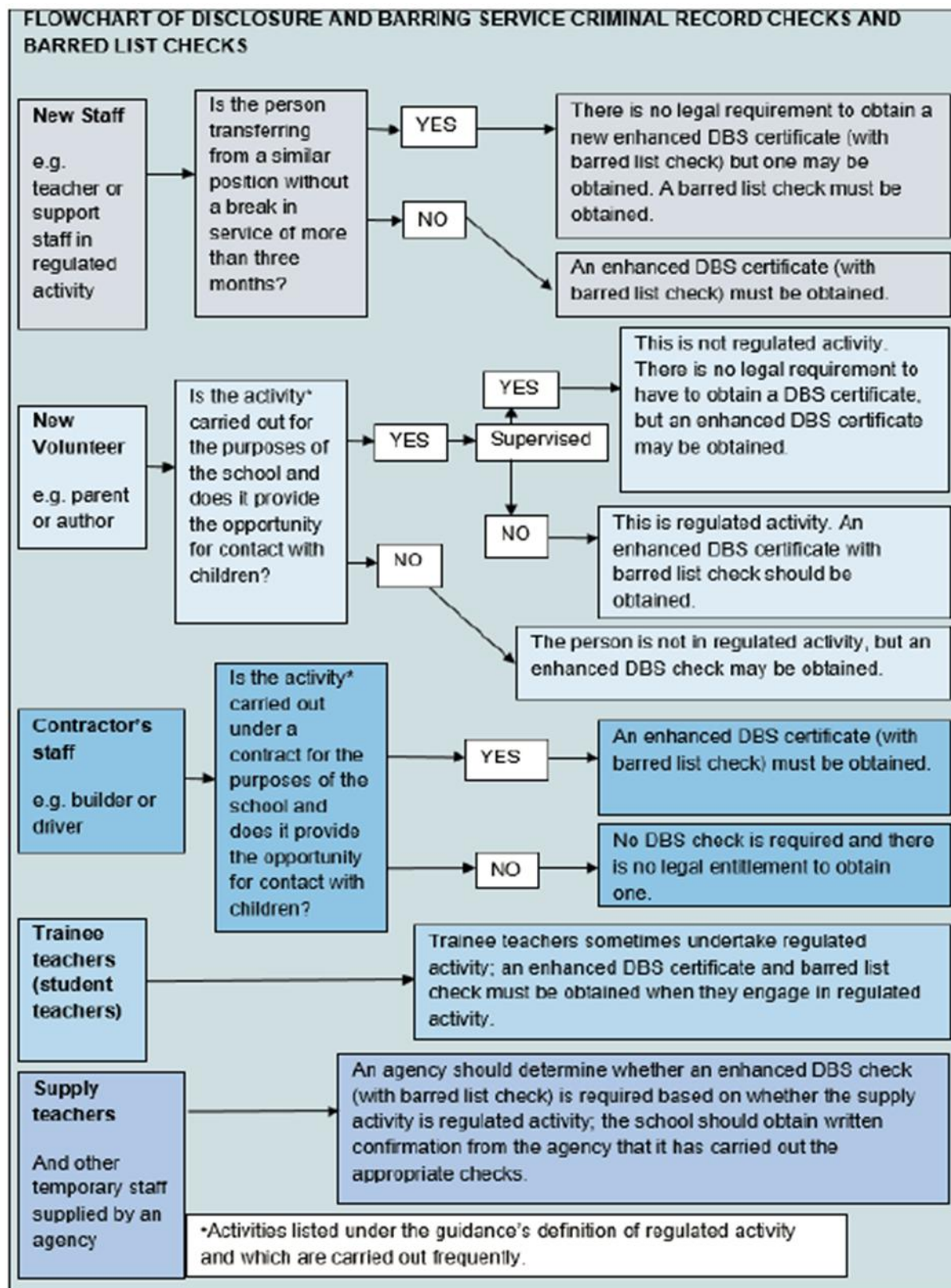
## **12. Reporting Content Online**

Support should be provided to:

- Help pupils report content via platforms.
- Use takedown services (e.g. Report Harmful Content or social media tools).
- Ensure timely action and follow-up.



# APPENDIX H: Flowchart of disclosure and barring service criminal records check and barred list check



APPENDIX I:

# OPERATION ENCOMPASS



## Police Response

- Police attend a Domestic Abuse (DA) incident.
- Details are recorded, including:
  - Perpetrator, victim, and all children usually residing at the address (whether present or not). Voice of the Child is documented



## Notification to School

- The attending police officer emails a notification to the school before end of their shift.
- Every effort is made to ensure notifications are sent by 09:00 the next school day.
- If the officer does not send it, the GMP Safeguarding Team ensures delivery.



## Implementation of Support

- The school's strategy may include:
  - Checking safeguarding records for previous concerns.
  - Quiet or overt support from staff.
  - Speaking with the child's teacher.
  - Monitoring wellbeing.
- If there is evidence or suspicion of significant harm, a referral is made to Children's Social Care





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## APPENDIX J

# THRESHOLD OF NEED FRAMEWORK – TRAFFORD

## UNIVERSAL

Child is thriving. All needs are met by universal services (e.g. school, GP, health visitor).

## EARLY HELP / PREVENTION

Child may benefit from additional support from an agency/agencies.

### NEXT STEPS

Support family through Early Help processes. Develop an Outcome Plan identifying community-based or specific interventions.

## INTENSIVE FAMILY SUPPORT

Family has multiple or complex needs. Struggling to make progress without targeted support.

### CHILD IN NEED

Initiate Early Help Assessment, Engage Intensive Family Support and coordinate multi-agency support.

## CHILD PROTECTION

Child is at risk of or suffering significant harm. Urgent intervention needed.

### CHILD PROTECTION

Immediate referral to Children's Social Care. May lead to CP Plan or child becoming

## APPENDIX K

### Child-on-Child Abuse

At Bowdon Prep, the **Governing Body, staff, volunteers, and wider school community** are committed to the **early identification, prevention, and response** to all forms of child-on-child abuse, both within and outside of school.

### Core Commitments

- A **whole-school safeguarding approach** is essential to identify and address the risks pupils may face.
- This policy is designed to **prevent** abuse, not simply to react after incidents.
- Our approach is informed by national awareness (e.g. *Everyone's Invited* 2021) and current statutory guidance including:
  - **KCSIE (2025)**
  - **Sexual Violence and Sexual Harassment in Schools (DfE 2021)**
  - **Harmful Sexual Behaviour Framework** (NSPCC & Research in Practice)
  - **ISSRs (Part 3, Paragraph 7)**
  - **UKCIS guidance on youth-produced sexual imagery**

### Safeguarding-Focused Language

We avoid terms such as “perpetrator” or “abuser” and instead adopt a **safeguarding lens** for all pupils involved, recognising that some may have experienced abuse themselves.

### Scope

This policy applies to **all pupils under 18**, and recognises the need for **age-sensitive** responses—particularly for those under 10 or over 18—depending on local authority thresholds and agency involvement.

### Parental Involvement

We encourage **parental engagement**. If a pupil is made to feel unsafe by peer behaviour, we urge parents to notify the school promptly so appropriate support and action can be taken.

### Image Sharing

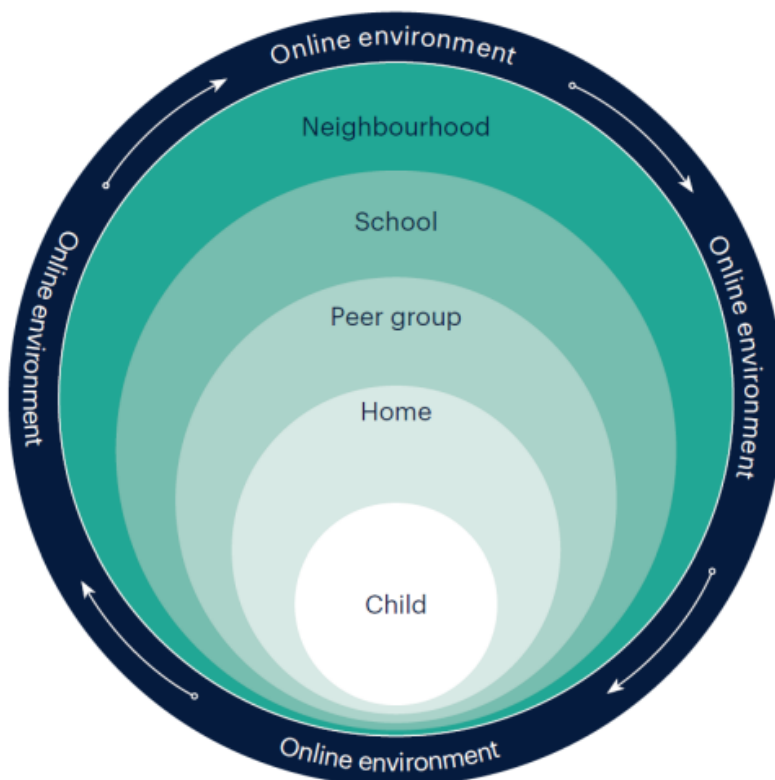
Our response to youth-produced sexual imagery will depend on the age and needs of those involved. See the **Taking, Sharing and Using Images of Young Children Policy** for further guidance.

### Review and Monitoring

This policy is reviewed **annually** and as needed throughout the year. Staff and pupil input informs updates, and effectiveness is monitored to ensure pupils are safeguarded against evolving risks.



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All staff must be aware that **child-on-child abuse** can take many forms. This includes, but is not limited to:

- Bullying (including cyberbullying)
- Physical abuse
- Sexual abuse and harassment (including online and verbal abuse)
- **Upskirting** – a criminal offence under the *Voyeurism (Offences) Act 2019*
- Sexting and non-consensual sharing of nude/semi-nude images or videos
- Hazing/initiation-type violence
- Gender-based violence
- Relationship abuse (including peer-on-peer domestic violence)

**All child-on-child abuse is unacceptable** and will be taken seriously, whether it occurs in or outside of school.

Bowdon Preparatory School adopts a **contextual safeguarding** model, as outlined in KCSIE 2025, recognising that abuse can occur beyond the home.

We are committed to:

- Understanding the **influence of peer, online, and community contexts**
- Working **in partnership** with Trafford's safeguarding services
- Promoting a **whole-school culture** of safety, inclusion, and respect
- Providing staff and pupils with **training** on healthy relationships, consent, and tackling bias and stereotypes
- Identifying and addressing **physical or social "hotspots"** within the school where risk may be heightened
- Monitoring for changes in behaviour, well-being, and attendance as indicators of potential harm

### **Vulnerability to Child-on-Child Abuse:**

While any pupil may be affected, some are **more vulnerable** due to individual or contextual factors. These include pupils who:

- Are socially isolated
- Are exploring their **sexuality or gender identity**
- Have **SEND** (staff must not assume behaviour is solely linked to additional needs)
- Belong to minority **ethnic, racial, or religious groups**

Under the *Equality Act 2010*, these may relate to **protected characteristics**.

The school recognises that abuse may impact **girls and boys differently** and will consider **gender dynamics** and **contextual safeguarding (KCSIE 2025)** in its response.

### **Preventing and Responding to Child-on-Child Abuse**

Bowdon Prep adopts a whole-school approach to preventing, identifying, and responding to child-on-child abuse, in line with **KCSIE 2025, Sexual Offences Act 2003, Data Protection Act 2018, and UK GDPR**.

#### **Prevention**

- Embed contextual safeguarding in the curriculum and school culture
- Educate pupils on consent, equality, respect, and digital safety
- Address all concerns, including low-level incidents
- Maintain a zero-tolerance stance
- Engage parents in safety measures and risk identification
- Monitor trends through weekly safeguarding reviews





### Staff Responsibilities

- Report all concerns to the DSL/DDSL without delay
- Treat all allegations seriously and sensitively
- Provide support to all affected pupils

### Multi-Agency Working

- Follow *Trafford Safeguarding Partnership* protocols
- Refer to Children's Services/police where appropriate
- Use and share data lawfully and securely

### Response to Allegations

- Investigate thoroughly and record actions
- Refer immediately where risk is present
- Prioritise the victim's voice and safety
- Implement safety plans as required

### Safety Plans May Include:

- Avoidance of identified risks
- Regular staff check-ins
- Counselling referrals
- Mental health and resilience strategies

### Sexual Violence (Sexual Offences Act 2003)

- **Rape:** Penile penetration without consent
- **Assault by Penetration:** Non-penile sexual penetration without consent
- **Sexual Assault:** Non-consensual sexual touching
- No child under 13 can legally consent. Age of consent is 16.

### Support Services

- Barnardo's, NSPCC, Lucy Faithfull Foundation, Marie Collins Foundation, Rape Crisis
- UK Safer Internet Centre, Victim Support, The Survivors Trust, Anti-Bullying Alliance

### Disciplinary Action

- Proportionate, safeguarding-led action
- Expulsion only where safety demands it

### Ongoing Review

- Evaluate safeguarding impact regularly
- Use pupil voice and case reflection to guide improvement

- Collaborate with local agencies

## Key Review Questions

- What protections work and where are gaps?
- Are there physical, digital or cultural risk factors?
- Do past cases suggest changes to training, policy, or provision?
- Is pupil voice central to strategy?

The DSL, with SLT support, will oversee implementation and review.

## APPENDIX L

### KCSIE 2025 Key Updates

- 1. Attendance is now statutory**
  - *Working Together to Improve School Attendance* (2024) is formally recognised in KCSIE 2025 (see para 177). Schools must submit daily attendance registers and should trigger safeguarding referrals for persistent absence ([services4schools.org.uk](https://services4schools.org.uk), [safeguarding.network](https://safeguarding.network)).
- 2. Online risks expanded**
  - Under content risks, KCSIE now explicitly names **misinformation, disinformation, and conspiracy theories** as safeguarding concerns (para 135) ([Honeyguide School Leader Support](https://honeyguide.org.uk/school-leader-support)).
- 3. \*\*Encryption, filtering, and AI guidance\*\***
  - New links to DfE “Plan Technology for Your School” tool (paras 142–144).
  - Emphasis on reviewing filtering, cybersecurity, and monitoring systems, including generative AI risk assessments (paras 143–144) ([services4schools.org.uk](https://services4schools.org.uk), [headteacherchat.com](https://headteacherchat.com)).
- 4. \*\*Alternative Provision (AP) duties\*\***
  - Schools remain responsible for safeguarding pupils in AP settings. Mandatory written confirmation required that all AP staff are DBS/checked.
  - Schools must monitor AP placements—know attendance, monthly reviews, and withdraw placement if unsafe (paras 169–170, 331) ([services4schools.org.uk](https://services4schools.org.uk)).
- 5. Expanded role for Virtual School Heads**
  - Virtual School Heads now also support children in **kinship care** (not just those in local authority care) (para 199) ([services4schools.org.uk](https://services4schools.org.uk)).
- 6. SEND language updated**
  - Terminology aligned with SEND Code of Practice; removes “spectrum” and “disorder” when referring to autism (para 205) ([Honeyguide School Leader Support](https://honeyguide.org.uk/school-leader-support), [services4schools.org.uk](https://services4schools.org.uk)).
- 7. Updated RSHE & gender-questioning links**
  - Placeholder (para 128) added for upcoming RSHE and **gender-questioning child guidance**. Expect final version and direct references by September 1, 2025 ([services4schools.org.uk](https://services4schools.org.uk)).
- 8. Minor/reference link updates**
  - Updated links for safer recruitment (paras 260, 266, 319, 331) and corrections in annex titles and Employment Practices guidance ([safeguarding.network](https://safeguarding.network)).
  - New resource “Shore” (Lucy Faithfull Foundation) signposted for child-on-child sexual harm support ([safeguarding.network](https://safeguarding.network)).
- 9. Future references flagged**
  - Annex F notes forthcoming updates related to Children’s Wellbeing & Schools Bill, findings

from the Group-Based CSE Inquiry (Casey Audit), and Violence Against Women and Girls strategy ([GOV.UK](https://www.gov.uk)).

### Next Steps

- **Update policies and training** to reflect statutory attendance duties and new online harms.
- **Audit cybersecurity and filtering systems**, include generative AI in risk assessments.
- **Ensure written confirmations** for safeguarding compliance in AP settings and schedule placement reviews.
- **Review terminology** for SEND and rename accordingly.
- **Prepare for RSHE/gender guidance** by auditing current curriculum and embedding links when released.
- **Share with governors and DSLs**, highlight flagged future changes to ensure readiness.

### APPENDIX M – Spectrum of behaviour

<p><b>Allegation that may meet the harm threshold</b></p> <p>Report to headteacher or alert LADO and/or Police</p> <p>Behaviour which indicates that an adult who works with children has;</p> <ul style="list-style-type: none"> <li>• Behaved in a way that has harmed a child or may have harmed a child and/or</li> <li>• Possibly committed a criminal offence against or related to a child; and or</li> <li>• Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and or</li> <li>• Behaved or may have behaved in a way that indicates they may not be suitable to work with children</li> </ul>
<p><b>Low – Level Concern</b></p> <p>Does not mean that it is insignificant. A low-level concern is any concern – no matter how small; and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working with children may have acted in a way that:</p> <ul style="list-style-type: none"> <li>• Is inconsistent with the School’s Staff Code of Conduct, including inappropriate conduct outside of work; and</li> <li>• Does not meet the harm threshold or is otherwise not serious enough to merit a referral to the LADO</li> <li>• Report to the Headteacher</li> </ul>
<p><b>Appropriate Conduct</b></p> <p>Behaviour which is entirely consistent with the School’s Staff Code of Conduct, and the law</p>



## Glossary

Term	Meaning
A Child	A person who has not yet reached their 18 <sup>th</sup> birthday.
Abuse, Neglect and Exploitation	A form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
Bullying & Cyberbullying	Behaviour that is: <ul style="list-style-type: none"><li>• repeated</li><li>• intended to hurt someone either physically or emotionally</li><li>• often aimed at certain groups, for example because of race, religion, gender or sexual orientation</li></ul>
Child abduction and community safety incidents	<p>Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers. Other community safety incidents in the vicinity of our school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.</p> <p>As children get older and are granted more independence (for example, as some Year 6 pupils may start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Year 6 attend Trafford's 'Crucial Crew' which gives practical advice about pupils looking after themselves outside of school.</p> <p>It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: <a href="http://www.actionagainstabduction.org">www.actionagainstabduction.org</a> and <a href="http://www.clevernevergoes.org">www.clevernevergoes.org</a></p>
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child sexual exploitation	Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.



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Term	Meaning
Children and the court system	<p>Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.</p> <p>The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.</p> <p>Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. We may refer some parents and carers to this service where appropriate.</p>
Children with family members in prison	<p>Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.</p>
Children with Special Educational Needs and/or disabilities	<p>SEN - a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her.</p> <p>Disability - a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.</p>
Contextual Safeguarding	<p>Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.</p>
County Lines	<p>County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Be aware of children who have been the perpetrator or alleged perpetrator of serious crime (knife crime), as well as the victim.</p>
Criminal Exploitation	<p>Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.</p>



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Term	Meaning
Cybercrime	<p>is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:</p> <ul style="list-style-type: none"> <li>• unauthorised access to computers (illegal 'hacking'), for example accessing a computer network to look for test paper answers or change grades awarded;</li> <li>• denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,</li> <li>• making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.</li> </ul> <p>Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.</p> <p>If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety</p>
Domestic Abuse	<p>Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn. Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:</p> <ul style="list-style-type: none"> <li>• psychological</li> <li>• physical</li> <li>• sexual</li> <li>• financial</li> <li>• emotional</li> </ul>
Early Help	<p>Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse and reflects the Working Together to Safeguard Children guidance</p>



Term	Meaning
Emotional Abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.</p> <p>It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p>
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
Gangs & Youth Violence	<p>Defining a gang is difficult, They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang.</p> <p>A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.</p> <p>An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).</p>
Hate	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> <li>• disability</li> <li>• race</li> <li>• religion</li> <li>• transgender identity</li> <li>• sexual orientation.</li> </ul>
Homelessness	Being homeless, or at risk of homelessness presents a real risk to a child's welfare. We will be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect





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Term	Meaning
	that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.
Honour-based violence	Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
Image Sharing “sexting”	Sexting is when someone shares consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. <sup>1</sup> They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.
Low-Level Concern	Behaviour from a member of staff that is inconsistent with the staff code of conduct but does not meet the harm (whistleblowing) threshold – Poor professional conduct, having favourites, using inappropriate language. Low-level concerns should be reported to the Headteacher. Staff can also self-refer.
<a href="#">Mental Health</a>	Negative experiences and distressing life events can affect mental health in a way that can bring about changes in a young person’s behaviour or emotional state, displayed in a range of different ways, all of which can be an indication of an underlying problem. This can include: <ul style="list-style-type: none"><li>• Emotional state (fearful, withdrawn, low self-esteem)</li><li>• Behaviour (aggressive or oppositional; habitual body rocking)</li><li>• Interpersonal behaviours (indiscriminate contact or affection seeking, over-friendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).</li></ul>
<a href="#">Modern Slavery</a>	Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.
Neglect & Exploitation	Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: <ul style="list-style-type: none"><li>• Protect a child from physical and emotional harm or danger.</li></ul>

<sup>1</sup> Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos





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	<ul style="list-style-type: none"> <li>• Ensure adequate supervision (including the use of inadequate care-givers).</li> <li>• Ensure access to appropriate medical care or treatment.</li> <li>• It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</li> </ul>
Operation Encompass	Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website
Child-on-Child Abuse (previously peer-on- peer abuse)	Children can abuse other children (now referred to as Child-on-Child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of Child-on-Child abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future
Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their



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Term	Meaning
	own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)
Radicalisation & Extremism	The process of a person legitimising support for, or use of, terrorist violence Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	<ul style="list-style-type: none"> <li>• protecting children from maltreatment;</li> <li>• preventing impairment of children's health or development;</li> <li>• ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and</li> <li>• taking action to enable all children to have the best outcomes.</li> </ul>
Serious Violence	<p>The word 'gang' means different things in different contexts, the government in their paper 'Safeguarding children and young people who may be affected by gang activity' distinguishes between peer groups, street gangs and organised criminal gangs.</p> <ul style="list-style-type: none"> <li>• Peer group A relatively small and transient social grouping which may or may not describe themselves as a gang depending on the context.</li> <li>• Street gang "Groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity."</li> <li>• Organised criminal gangs "A group of individuals for whom involvement in crime is for personal gain (financial or otherwise). For most crime is their 'occupation.'"</li> </ul> <p>It's not illegal for a young person to be in a gang – there are different types of 'gang' and not every 'gang' is criminal or dangerous. However, gang</p>



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Term	Meaning
	membership can be linked to illegal activity, particularly organised criminal gangs involved in trafficking, drug dealing and violent crime.
Sexual Abuse	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.</p> <p>They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p> <p>The requirement to preserve records which contain allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse has been removed – KCSIE 2025</p>
Sexual harassment between children	When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment, and can include: sexual comments, sexual jokes or taunting, online sexual harassment or physical behaviour such as deliberately brushing against someone.
Sexual violence between children	<p>When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003<sup>2</sup>.</p> <p>Sexual violence offences include: rape, assault by penetration and sexual assault.</p>
Trafficking	Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.
Whistle Blowing	Raising a high-level concern and reporting serious wrongdoings. Think: “This is serious and must be escalated.” All staff should whistle blow if there are safeguarding failures or cover ups. Reports should be made to the Headteacher. If staff feel unable to report to the Headteacher, they should reach out to the Chair of Governors. LADO and/or the police can also be contacted if evidence of criminal activity or child safeguarding issues.



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### **Policy Review and Dissemination**

All members of staff and governors will receive a copy of this policy (via TEAMS link).

The policy will be available for parents on our website. A paper copy can be requested via the School Office [office@bowdonprep.org.uk](mailto:office@bowdonprep.org.uk)

<b>SLT member responsible</b>	SHughes
<b>Governor / Board Responsible</b>	Full Board
<b>Date of review</b>	September 2025
<b>Date of next review</b>	September 2026