

Safeguarding and Child Protection Policy

Effective 1 September 2026 | Next scheduled review August 2027

Policy owner	Greg Holden, Designated Safeguarding Lead / Principal
Reviewed by	Cathy Arnold, Deputy Designated Safeguarding Lead / Director of Teaching & Learning
Current guidance basis	Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026
Effective date	1 September 2026
Review cycle	At least annually, and earlier following material changes to law, guidance, provision, technology or safeguarding practice

Key safeguarding contacts

Designated Safeguarding Lead (DSL)	Greg Holden Principal gregholden@milvertoneducation.com +44 (0)7985 629166
Deputy Designated Safeguarding Lead (DDSL)	Cathy Arnold Director of Teaching & Learning c.arnold@milvertoneducation.com +44 (0)330 133 8300
Allegation concerning the Principal	Report to the Chair/Proprietor without informing the Principal first. Current direct contact details are maintained in the staff safeguarding induction information and by the DDSL. If there is a conflict of interest, report directly to the relevant LADO.
Emergency / statutory services	Immediate danger: 999 Non-emergency police: 101 Child at risk: children's social care for the child's home local authority. Relevant LADO details are held by the safeguarding team and are available on the local authority website.

Staff: immediate safeguarding response

- If a child is in immediate danger or at risk of serious immediate harm, call 999 and then inform the DSL/DDSL.
- Report every safeguarding concern to the DSL/DDSL without delay and complete a factual Safeguarding Concern Record as soon as possible.
- Do not investigate, promise secrecy, delay action, or assume somebody else will report the concern.
- A concern about an adult working for or on behalf of Milverton must be reported under the staff-allegation or low-level-concern procedure, not handled informally.

1. Purpose, scope and legal framework

Milverton Education is committed to safeguarding and promoting the welfare of every child and to creating a culture in which safeguarding is understood to be everyone's responsibility. The School adopts an "it could happen here" approach, acts with urgency when concerns arise, and puts the best interests of the child at the centre of decision-making.

This policy applies to all employees, self-employed teachers and tutors, temporary and supply staff, trainee teachers, volunteers, contractors, board/governance members and any other adult working for or on behalf of Milverton who may have contact with pupils or access to pupil-facing systems. For the purposes of this policy, a child is anyone under the age of 18.

Milverton is an online education provider. Where a statutory duty or regulatory provision applies directly to Milverton, it will be followed. Where a provision is framed for a physical school environment or does not apply directly because of Milverton's delivery or regulatory model, Milverton nevertheless adopts the safeguarding expectations in Keeping Children Safe in Education (KCSIE) 2026 as its benchmark and adapts them proportionately to an online setting.

This policy has been prepared with regard to the following principal legislation and guidance:

- Children Act 1989 and Children Act 2004;
- Education Act 2002 and the Education (Independent School Standards) Regulations 2014, where applicable;
- Keeping Children Safe in Education 2026 (effective from 1 September 2026);
- Working Together to Safeguard Children 2026;
- What to do if you're worried a child is being abused: advice for practitioners;
- Equality Act 2010 and relevant Human Rights legislation;
- Counter-Terrorism and Security Act 2015 and Prevent duty guidance: England and Wales (2023);
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025;
- Female Genital Mutilation Act 2003 and the mandatory reporting duty, where applicable;
- current DfE guidance on online safety, remote education, filtering and monitoring, cyber security and generative AI.

This policy should be read alongside the Behaviour Policy, Anti-Bullying Policy, Attendance Policy, Staff Code of Conduct, Safer Recruitment Policy, Data Protection Policy, Online Safety/E-Safety Policy, SEND Policy, Complaints Procedure, RSHE/RHSE arrangements, and the procedure for managing allegations against adults.

2. Safeguarding principles and terminology

Safeguarding includes providing help and support as soon as problems emerge; protecting children from maltreatment inside or outside the home, including online; preventing impairment of physical or mental health or development; ensuring safe and effective care; and taking action to enable children to have the best outcomes.

- Child-centred practice: staff consider at all times what is in the child's best interests and listen carefully to the child's wishes and feelings.
- Professional curiosity: absence of a disclosure does not mean absence of harm. Children may not be ready or able to tell someone, may not recognise an experience as harmful, or may face communication or other barriers.
- Early action: staff act immediately on concerns and do not wait for certainty. Safeguarding issues often overlap and may occur both online and offline.
- Need-to-know confidentiality: information is shared appropriately to protect children. Staff must never promise a child absolute confidentiality.
- Respectful language: the term "victim" may be used for clarity, but staff should use language with which the child is comfortable. "Alleged perpetrator" is used carefully and does not imply that an allegation has been proven.
- Child-on-child abuse: abuse by one or more children against another child, including abuse between children of different ages or peer groups.
- Nudes and semi-nudes: the making or sharing of nude or semi-nude visual content involving a person under 18, including photographs, video, livestreams, digitally altered material and content wholly or partly generated by artificial intelligence, including deepfakes/deep nudes.
- Low-level concern: a concern about an adult's behaviour that is inconsistent with the Staff Code of Conduct but does not meet the harm threshold. "Low-level" does not mean insignificant.

3. Roles and responsibilities

3.1 Governing body / proprietor

- ensure effective safeguarding arrangements, appropriate resources and an open safeguarding culture;
- ensure the DSL is a senior member of staff with sufficient authority, time, training and support;
- ensure this policy and related safeguarding procedures are reviewed at least annually;
- ensure all staff, including staff who do not work directly with children, read KCSIE 2026 Part One in full and are supported to understand their responsibilities;
- ensure safer recruitment, the Single Central Record, staff-allegation procedures, low-level-concern procedures and DBS/TRA referral duties are implemented;
- ensure online safety, filtering and monitoring, information security and safeguarding risks associated with generative AI are appropriately governed and reviewed;
- ensure children are taught how to keep themselves and others safe, including online.

3.2 Principal

- ensure this policy is implemented in day-to-day practice and that safeguarding is properly resourced;
- act as case manager for allegations that may meet the harm threshold unless the allegation concerns the Principal;
- be the ultimate decision-maker for low-level concerns, informed by the DSL where the DSL receives the concern first;
- ensure staff are trained, systems are monitored and safeguarding weaknesses are remedied without delay.

3.3 Designated Safeguarding Lead and Deputy DSL

The DSL has lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring arrangements that apply to Milverton's systems. The DDSL is trained to the same standard and carries out the DSL function when required.

- act as the main point of advice for staff and maintain an overview of the safeguarding picture for each child;
- manage referrals to children's social care, police, Family Help, Prevent/Channel, the Disclosure and Barring Service, the Teaching Regulation Agency or other agencies as appropriate;
- liaise with the Principal, relevant local authorities, LADO services, police and other professionals;
- support staff who make referrals and contribute to multi-agency assessments, meetings and plans;
- maintain secure, accurate safeguarding records, including decisions, rationale, actions and outcomes;
- ensure child protection files are transferred promptly and securely when a child moves setting;
- promote awareness of safeguarding, ensure children's views are understood and help parents/carers understand Milverton's safeguarding responsibilities;
- undertake DSL training at least every two years and keep knowledge and skills up to date at regular intervals, including through annual updates and professional learning.

Milverton maintains clear cover arrangements for periods when the DSL is unavailable. During normal operating periods the DDSL provides cover. If neither DSL nor DDSL is immediately available, staff must not delay action: they should contact statutory services directly where required and inform the safeguarding team as soon as possible.

3.4 All staff

- read and understand KCSIE 2026 Part One and this policy;
- know the identities of the DSL and DDSL and understand Milverton's reporting systems;
- complete safeguarding and online-safety training at induction and keep knowledge up to date;
- recognise indicators of abuse, neglect, exploitation and other safeguarding concerns;
- report and record concerns without delay, even where they appear minor;
- understand that they may make a direct referral to children's social care or the police if necessary, particularly if the DSL/DDSL is unavailable or the child is at immediate risk;
- maintain professional boundaries and report concerns about adults, including self-referrals where their own conduct may have been misinterpreted or fallen below expected standards.

4. Induction, training and safeguarding awareness

All staff receive safeguarding and child protection training, including online safety, at induction. Training is regularly updated, and all staff receive safeguarding updates at least annually and more often where guidance, risks or school systems change.

Induction must include:

- this Safeguarding and Child Protection Policy;
- the Behaviour Policy, including prevention of bullying, cyberbullying and discriminatory bullying;
- the Staff Code of Conduct, including professional boundaries, allegations, low-level concerns and whistleblowing;
- Milverton's safeguarding response to children who are absent from education, particularly repeated or prolonged absence;
- the identity and role of the DSL and DDSL;
- KCSIE 2026 Part One in full;
- online-safety expectations, including staff responsibilities for filtering and monitoring arrangements, safe use of generative AI and secure use of school systems;
- how to report and record concerns using Milverton's safeguarding concern process, including what to do if the standard form is temporarily unavailable.

At least one member of any recruitment panel will have completed appropriate safer-recruitment training. Staff involved in recruitment will refresh their knowledge when legislation or KCSIE requirements change and at intervals appropriate to their role.

5. Recognising abuse, neglect, exploitation and safeguarding concerns

Staff should be alert to indicators of physical abuse, emotional abuse, sexual abuse and neglect, as well as exploitation, modern slavery, domestic abuse, harmful sexual behaviour, child criminal exploitation, child sexual exploitation, serious violence, radicalisation and online harm. Abuse can occur in the family, community or institutional settings, and can occur wholly online or be facilitated by technology.

Safeguarding concerns rarely fit a single category. A change in attendance, engagement, behaviour, appearance, emotional presentation, peer relationships, attainment, online activity or family circumstances may form part of a wider safeguarding picture. Staff should report concerns rather than attempting to diagnose or determine whether abuse has occurred.

The detailed indicators in Appendix 1 are prompts, not a checklist. The presence or absence of any one indicator is not proof of abuse.

6. Children who may benefit from support before statutory intervention

Any child may benefit from universal services and community-based early help or from the targeted early help level of Family Help. Staff should be particularly alert where a child:

- is disabled, has a medical condition or has specific additional needs;
- has special educational needs and/or disabilities, whether or not they have an Education, Health and Care Plan;
- has a mental-health need;
- is a young carer;
- is pregnant and/or is a parent themselves;
- has exhibited early signs of abusive, violent or harmful behaviour;
- shows signs of anti-social or criminal behaviour, gang involvement, organised crime or county lines;
- is frequently missing from education, home or care, or has repeated/prolonged unexplained absence;
- has experienced repeated removal from learning, multiple suspensions, a part-time timetable, risk of exclusion or alternative provision;
- is at risk of exploitation, modern slavery or trafficking, including criminal, sexual or financial exploitation;
- is at risk of radicalisation into terrorism;
- has a parent/carer in custody or is affected by parental offending;
- lives in circumstances involving substance misuse, adult mental-health problems, domestic abuse, homelessness or temporary accommodation;
- is misusing alcohol or drugs;
- is at risk of honour- or faith-based abuse, including FGM or forced marriage;
- is privately fostered;
- is looked after, previously looked after or living in kinship care;
- faces barriers linked to SEND, language, discrimination, sexual orientation or gender questioning that may make it harder to disclose harm.

Where Family Help or other support may be appropriate, the DSL will work with the child, parents/carers and relevant agencies where safe and appropriate. A child's need for support must

not be allowed to drift simply because the threshold for statutory child protection intervention has not been met.

7. Responding to a concern or disclosure

Any concern about a child's welfare must be acted on without delay. If a child makes a disclosure, staff should:

- listen carefully, remain calm and take the child seriously;
- reassure the child that they have done the right thing by speaking and that the concern will be taken seriously;
- not promise secrecy; explain that information may need to be shared with people whose role is to keep them safe;
- avoid leading questions, repeated questioning or investigating. Clarify only what is necessary to understand immediate safety and what needs to be reported;
- use the child's own words where possible and avoid making assumptions;
- consider immediate safety. Call 999 if the child is in immediate danger or there is a risk of serious immediate harm;
- report the matter to the DSL/DDSL immediately and make an accurate written record as soon as possible;
- preserve relevant evidence. Staff must not forward, copy, print, download or unnecessarily view nude/semi-nude images of children.

Where staff have concerns but a child has not disclosed anything, they should maintain professional curiosity and speak to the DSL/DDSL. A child's reluctance or inability to disclose must not prevent action.

8. Recording safeguarding and welfare concerns

Staff must report any safeguarding, wellbeing or welfare concern about a child to the DSL or DDSL without delay. Where a concern is urgent, or a child may be at immediate risk of harm, staff must contact the DSL/DDSL immediately by telephone or direct communication and must not wait to complete a written form. Where a child is in immediate danger or there is a risk of serious immediate harm, staff should call 999 as appropriate and then inform the DSL/DDSL.

All concerns must also be recorded in writing as soon as possible, normally on the same working day, using the Milverton Education Safeguarding Concern Record. Records should be factual, clear and contemporaneous and include:

- the pupil's name;
- date and time of the incident, disclosure or observation;
- what was seen, heard or reported, using the child's exact words where relevant;
- the context in which the concern arose;
- any immediate action taken;
- who was informed and when;
- the name of the staff member making the record.

The completed Safeguarding Concern Record must be sent securely to the DSL/DDSL using an approved Milverton school communication channel. Staff should ensure that the concern has been received. If the standard form is temporarily unavailable, staff must create a secure written record containing the same information and send it to the DSL/DDSL; safeguarding action must never be delayed because a form or template is unavailable. The DSL/DDSL will record subsequent actions, decisions, the reasons for those decisions, referrals, follow-up and outcomes, and will maintain an appropriate safeguarding chronology.

Safeguarding records are confidential. The DSL/DDSL will store them in a restricted-access safeguarding file for each pupil, separate from the pupil's ordinary educational records. Access is limited to those who require the information for safeguarding purposes. Safeguarding records must be transmitted and stored using approved Milverton systems and must not be kept in personal email accounts, personal cloud storage or informal messaging services. Records are managed in accordance with data-protection, information-sharing and retention requirements.

9. Referrals, parents/carers and multi-agency working

Milverton is not an investigating agency. Its role is to recognise concerns, provide appropriate immediate support, record information and refer to the appropriate statutory or specialist service.

For a child in England, referrals to children's social care should normally be made to the local authority in which the child lives. The DSL will follow the published local threshold and referral arrangements and will support children's social care, police and other agencies following a referral.

Parents/carers will normally be informed about concerns and involved in support where it is safe and appropriate to do so. However, parental consent is not required before information is shared for safeguarding where there is a lawful basis and there is good reason to share, including where seeking consent is impracticable, cannot reasonably be expected, would cause delay, or could place a child or another person at increased risk. Decisions about informing parents must be based on the child's safety and best interests and should be recorded.

Any staff member may make a direct referral to children's social care or the police. If a staff member remains concerned after a matter has been reported internally, they must follow up with the DSL/DDSL and, if necessary, escalate the matter or make a direct referral. Staff must not assume that a referral has been made unless they have confirmation.

10. Confidentiality, information sharing and child protection files

Data protection law is not a barrier to appropriate information sharing for safeguarding. Milverton will share information when it is necessary, proportionate and relevant to protect a child, and will do so securely and in a timely manner. Staff should not allow uncertainty about data protection to prevent them from safeguarding a child.

When sharing safeguarding information, staff and the DSL should consider the purpose of sharing, the risks of sharing or not sharing, what information is necessary, who needs it, how it will be transmitted securely, and what should be recorded. Decisions and rationale should be documented.

Where a child leaves Milverton and the receiving school or college is known, the DSL/DDSL will transfer the child protection file separately from the main pupil file, securely and as soon as possible. The transfer should normally take place within 5 days for an in-year move or within the first 5 days of the start of a new term. Receipt should be confirmed. Where appropriate, the transfer will include a clear structured summary of current risk, relevant history, actions and protective factors.

Safeguarding records will be retained in accordance with Milverton's retention schedule, KCSIE and applicable data-protection requirements. Records connected to an active allegation, referral or legal process must not be destroyed simply because the pupil or staff member has left.

11. Child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence

Children can abuse other children. Milverton maintains an "it could happen here" approach even where there are no reports. Staff must never dismiss harmful behaviour as "banter", "just having a laugh", "boys being boys", "girls being girls" or an inevitable part of growing up.

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

- bullying, cyberbullying, prejudice-based and discriminatory bullying;

- abuse in intimate personal relationships between children, including coercive control, stalking and teenage relationship abuse;
- physical abuse, serious violence, threats of violence and incidents involving weapons;
- sexual violence and sexual harassment, including comments, jokes, sexualised bullying and unwanted sexual conduct;
- harmful sexual behaviour (HSB), which exists on a continuum and requires a safeguarding response for both the child harmed and the child displaying the behaviour;
- causing someone to engage in sexual activity without consent;
- upskirting and other image-based abuse;
- making or sharing nudes or semi-nudes, whether consensual or non-consensual, including digitally altered or AI-generated images/deepfakes;
- online abuse, including abusive, harassing, misogynistic or misandrist messages, pressure in group chats, unwanted pornography, sexualised content or threats;
- initiation or hazing-type violence or rituals.

All incidents involving nudes or semi-nudes require a safeguarding response, including where the image was initially made or shared consensually. Staff must follow current UKCIS guidance and should not view an image unless there is a clear and exceptional safeguarding reason agreed with the DSL.

When a report is made, Milverton will consider the immediate safety of all children involved, the wishes of the child harmed, the seriousness and context of the behaviour, ages and developmental stages, power imbalances, SEND and vulnerabilities, whether conduct is repeated, online dissemination, and whether statutory services or police should be involved. A written risk and needs assessment will be completed where appropriate.

Support will be provided to the child harmed and, separately, to the child alleged to have caused harm. The latter may also have unmet safeguarding needs. Measures may include changes to online groups or timetables, restrictions on direct messaging, supervised access, separate teaching arrangements, pastoral support, parental involvement and external referrals. Safety comes first, but decisions will be proportionate and will not prejudice the outcome of any investigation.

12. Online safety, generative AI, filtering and monitoring

Online safety is an integral part of safeguarding at Milverton because teaching, communication and much pupil interaction take place online. The School considers four broad areas of online risk:

- **Content:** exposure to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm or suicide content, antisemitism, radicalisation/extremism, extreme sexual or physical violence, misinformation, disinformation and conspiracy theories.
- **Contact:** harmful interaction with other users or with generative-AI applications that simulate interaction, including peer pressure, adults posing as children, grooming and sexual, criminal or financial exploitation.
- **Conduct:** online behaviour that increases the likelihood of or causes harm, including bullying, making/sending/receiving explicit content and AI-generated explicit images.
- **Commerce:** online gambling, inappropriate advertising, phishing, scams and other financial exploitation.

12.1 Generative AI

- Generative AI may be used only in accordance with Milverton's approved educational, data-protection and acceptable-use arrangements.
- Staff must not enter confidential safeguarding records, special-category pupil data or other sensitive personal information into unapproved consumer AI systems.

- Pupils and staff must not use AI to create sexualised, humiliating, abusive, deceptive or threatening material involving another person.
- AI-generated or digitally altered nudes/semi-nudes of children are treated as safeguarding matters in the same way as other nude/semi-nude imagery.
- Milverton will consider safeguarding, privacy, bias, intellectual-property, age-appropriateness and content/filtering risks before deploying pupil-facing AI products.

12.2 Filtering, monitoring and annual review

Milverton will maintain appropriate filtering, monitoring and platform controls for the systems, accounts, networks and devices it manages. Roles and responsibilities for these controls will be clear. Their effectiveness will be reviewed at least once each academic year by the responsible senior leader with support from the DSL and appropriate IT expertise, and the review will be recorded.

Checks will include whether controls work appropriately on internet-connected devices and systems managed by Milverton, whether staff understand how to escalate concerns, whether harmful content is blocked without unreasonably restricting teaching and learning, and whether monitoring arrangements are proportionate to the safeguarding risks of Milverton's pupils.

Because pupils normally learn from private homes using family networks and, in many cases, privately owned devices, Milverton cannot technically filter or monitor all household internet activity. Parents/carers are therefore given clear information about the online services pupils are expected to use and are encouraged to maintain age-appropriate home controls and supervision. This limitation does not reduce Milverton's duty to act on any online safeguarding concern that comes to its attention.

The School will also conduct an annual online-safety risk review and will consider DfE digital and technology standards, including filtering and monitoring and cyber-security standards, when assessing its arrangements.

12.3 Information security

- Pupils and staff must use individual authorised accounts and must not share passwords or access credentials.
- Access to safeguarding information and pupil data is limited according to role and need.
- Suspicious logins, account compromise, cyber incidents, phishing or inappropriate access must be reported promptly.
- Milverton will protect personal information and maintain cyber-security arrangements as part of its safeguarding responsibilities.

13. Safeguarding in live online teaching and school platforms

Milverton's online model requires specific safeguards. The following expectations apply to live lessons, mentoring, tutoring and other planned pupil-facing interactions:

- Only approved school platforms and authorised Milverton accounts may be used for teaching and formal pupil communication. Pupils are issued individual Milverton accounts for access to school systems.
- Teachers must use platform access controls and must not admit unidentified or unauthorised guests to lessons. Any suspicious access should be ended and reported.
- Scheduled live lessons and formal pupil-facing meetings are recorded as standard unless there is an exceptional, documented reason approved by the Principal/DSL or a technical failure. One-to-one sessions must have equivalent safeguards and should be recorded wherever the approved platform allows.

- Recordings are stored securely. Ordinary lesson recordings may be made available to enrolled pupils for learning and revision in accordance with Milverton's retention arrangements, normally for up to two academic years while the pupil remains enrolled. A recording connected to a safeguarding incident is preserved separately as evidence for as long as required and access is restricted.
- If a safeguarding incident occurs during a recorded lesson, the DSL will preserve the original recording. An academic copy may be withheld or edited to protect children, but the evidential original must not be altered.
- Webcams are encouraged where appropriate because visual contact can support engagement and wellbeing, but pupils should not be pressured to reveal private spaces or use a camera where there is a reasonable privacy, welfare or safeguarding reason not to do so.
- If a member of staff sees or hears something concerning in a pupil's environment, or notices a concerning change in behaviour or presentation, they must report it even if the concern appears incidental to the lesson.
- Staff must not use personal social-media accounts, personal messaging apps or private communication channels to communicate with current pupils. Any direct communication must be through approved professional systems.
- Pupil access to chat, direct messaging, shared files or other collaboration tools may be restricted where necessary to prevent bullying, harassment, sexualised behaviour or other safeguarding risks.

13.1 Mobile phones and personal devices

KCSIE 2026 reflects the DfE expectation that physical schools are mobile-phone-free by default. Milverton's remote model means pupils are usually in their own homes and the School cannot control possession of a personal phone in the same way. During live lessons, pupils are expected not to use personal phones or devices for unrelated purposes and parents/carers are encouraged to support a distraction-free and safe learning environment. Any use of a phone to bully, record, threaten, create imagery or otherwise harm another pupil is a safeguarding and behaviour matter.

13.2 Guest speakers and external contributors

External speakers and contributors must be appropriately briefed and, where necessary, risk assessed. Materials may be requested in advance. Contributions must not undermine safeguarding, equality or fundamental British values or promote extremist or harmful content. A Milverton staff member will normally remain present in live pupil-facing sessions.

14. Attendance, children absent from education and welfare checks

Repeated or prolonged absence from online education can be a safeguarding warning sign. Staff should be alert to unexplained failure to attend lessons, sudden disengagement, inability to contact a pupil/family, unusual patterns of absence or significant changes in participation.

Attendance concerns will be managed under the Attendance Policy and may include contact with parents/carers, a welfare check, contact with other professionals or referral to the child's home local authority. Where there is reason to believe a child may be missing, unsafe or at immediate risk, the DSL will escalate without delay to children's social care and/or the police.

15. Children potentially at greater risk of harm

Milverton recognises that some children experience additional barriers to seeking help or are more likely to be targeted. Safeguarding practice must be inclusive, anti-discriminatory and responsive to the child's individual circumstances.

15.1 SEND, medical needs and communication barriers

Children with SEND or medical conditions may be more vulnerable to abuse or may have additional barriers to disclosure. Behaviour, communication difficulties or injuries must not automatically be attributed to disability or need. Staff should consider how best to communicate with the child and seek specialist input where required.

15.2 Young carers

Young carers may experience hidden pressures, absence, fatigue, emotional distress or adult responsibilities. Staff should be alert to these pressures and consider Family Help or other support where appropriate.

15.3 LGB and gender-questioning children

Children who are lesbian, gay or bisexual, or who are questioning their gender, may be targeted by bullying, harassment, sexual violence or other abuse and may face barriers to disclosure. Staff must respond without discrimination or assumptions. Parents/carers are normally involved in wellbeing and support decisions unless doing so would create or increase a safeguarding risk. Any issue with broader safeguarding implications should be considered with the DSL and in line with current DfE guidance.

15.4 Looked-after, previously looked-after and kinship-care children

The DSL will take account of care arrangements, existing plans, social-worker involvement and relevant information-sharing needs. Staff should be aware that changes in placement, contact arrangements or care status may affect safeguarding and wellbeing.

15.5 Safeguarding and sport / external academies

Where pupils also train or participate with sports clubs, academies or other external organisations, Milverton will not assume that another organisation's involvement removes the School's safeguarding responsibility. Concerns arising from sport, coaching, travel, accommodation, adult relationships, physical treatment or online contact must be reported to the DSL and shared with the relevant safeguarding lead or statutory agency where appropriate. Any partnership arrangement should have clear safeguarding responsibilities and routes for sharing concerns.

16. Specific safeguarding issues

16.1 Domestic abuse and teenage relationship abuse

Domestic abuse may involve a single incident or a pattern of coercive, controlling, threatening, degrading, physical, sexual, economic or emotional behaviour. Children may see, hear or experience domestic abuse in the home or may experience abuse in their own intimate relationships. These experiences can have serious and long-term effects on health, development, wellbeing and learning. Relevant Operation Encompass notifications or equivalent information will be acted upon where received.

16.2 Child sexual exploitation and child criminal exploitation

Child sexual exploitation (CSE) and child criminal exploitation (CCE) occur where an individual or group uses an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Exploitation may appear consensual, may be facilitated by an organised network or gang, may involve children being criminalised for actions taken under coercion, and may occur online. County lines, financial exploitation and trafficking may form part of CCE.

Indicators can include unexplained money or possessions, older associates, changes in friendships, repeated absence, travel patterns, hotel/taxi use, sexual-health concerns, substance misuse, secrecy, fear, violence, decline in engagement or unusual online activity. Any concern must be referred to the DSL.

16.3 Modern slavery and trafficking

Modern slavery includes trafficking and exploitation of children for criminal, sexual, labour or other purposes. The DSL will consider referral to children's social care, police and the National Referral Mechanism where appropriate.

16.4 Serious violence

Staff should be alert to signs that a child may be at risk from or involved in serious violence, including significant changes in peer groups, repeated absence, unexplained injuries, threats, weapons, fear, exploitation, unexplained money or possessions, substance misuse or a marked deterioration in wellbeing or participation. Any concern should be reported promptly; immediate threats should be referred to police.

16.5 Mental health, self-harm and suicide risk

Mental-health difficulties can be an indicator that a child has experienced or is at risk of abuse, neglect or exploitation. Staff are not expected to diagnose conditions but should report concerns and seek appropriate support. Any disclosure or evidence of self-harm, suicidal thoughts, plans or immediate danger must be treated seriously and escalated according to the level of risk, including emergency services where necessary.

16.6 Radicalisation and Prevent

Milverton recognises its responsibility to help protect children from being drawn into terrorism. Staff should be alert to changes in behaviour, relationships, online activity, language or material that may indicate susceptibility to radicalisation, while avoiding stereotypes or assumptions. Concerns should be reported to the DSL, who will consider the current Prevent referral process and Channel support where appropriate. Where there is an immediate threat or suspected terrorism offence, the police should be contacted.

Milverton's Prevent arrangements have regard to the Prevent duty guidance for England and Wales (2023) and include consideration of online radicalisation and relevant risk assessment.

16.7 Honour- or faith-based abuse, FGM and forced marriage

So-called honour- or faith-based abuse can include threats, coercion, forced marriage, FGM and other forms of violence or control. Cultural, religious or family explanations must never be used to minimise harm.

Female Genital Mutilation (FGM): FGM is illegal in England and Wales and is child abuse. Teachers in England and Wales have a personal legal duty to report to the police a known case of FGM in a girl under 18 where, in the course of their professional work, the girl discloses that FGM has been carried out on her or the teacher observes physical signs that appear to show FGM has been carried out. The mandatory duty does not apply merely to suspected or at-risk cases; those cases must still be reported immediately through normal safeguarding procedures. Staff should also inform the DSL so that wider safeguarding needs can be considered.

Forced marriage: a forced marriage is one in which one or both parties do not freely consent or where pressure/coercion is used. In the UK, any marriage involving a person under 18 is considered a forced marriage even if no physical or emotional pressure is apparent. Concerns must be reported to the DSL. The Forced Marriage Unit can provide specialist advice: 020 7008 0151 / +44 (0)20 7008 0151 from overseas, fmu@fcdo.gov.uk. Call 999 in an emergency.

16.8 Cybercrime and online offending

A child may be drawn into cyber offending or may be exploited by others to carry out hacking, fraud, account compromise or other computer misuse. Behaviour that appears technically sophisticated or criminal may also indicate grooming, coercion or vulnerability. Staff should report concerns to the DSL and preserve evidence without attempting their own investigation.

17. Concerns or allegations about adults that may meet the harm threshold

This section applies to employees, self-employed staff, supply staff, trainee teachers, volunteers and contractors. The harm-threshold procedure applies where it is alleged that an adult working in or on behalf of Milverton 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;
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children, including relevant behaviour outside work (“transferable risk”).

Such concerns must be reported without delay. The reporting route is:

- Concern about any staff member/contractor/volunteer other than the Principal: report to the Principal. The DSL should also be informed as necessary to protect the child.
- Concern about the Principal: report to the Chair/Proprietor without informing the Principal first.
- Where the Principal is also the sole proprietor, or there is another conflict of interest that makes internal reporting inappropriate: report directly to the relevant Local Authority Designated Officer (LADO).
- If a child is at immediate risk: contact children’s social care and/or police immediately before or alongside the internal reporting route.

The case manager will consult the LADO as required and follow local procedures. Milverton will carry out only those initial factual enquiries that are consistent with LADO advice and that do not jeopardise a police or social-care investigation. Suspension is not an automatic response and will be considered only after an appropriate risk assessment and consultation.

Where the legal criteria are met, Milverton will make required referrals to the Disclosure and Barring Service. Where applicable, it will also consider referral to the Teaching Regulation Agency. Resignation or cessation of services does not prevent a referral or the completion of safeguarding processes.

18. Low-level concerns about adults

A low-level concern is any concern, no matter how small and even if it is only a sense of unease or “nagging doubt”, that an adult working in or on behalf of Milverton may have acted in a way that is inconsistent with the Staff Code of Conduct but does not meet the harm threshold or is not otherwise serious enough to consider a LADO referral.

Examples may include being over-friendly with children, favouritism, inappropriate personal contact or messaging, taking images contrary to policy, humiliating a child, inappropriate conduct outside work, or conduct that could reasonably be misinterpreted. The purpose of reporting is to create openness and identify patterns early, not to label every minor mistake as abuse.

Low-level concerns must be reported promptly to the DSL or Principal using the designated confidential route. If received by the DSL, the DSL will inform the Principal in a timely manner; the Principal is the ultimate decision-maker. Concerns about the Principal follow the route in section 17. If there is doubt about whether the harm threshold is met, advice will be sought from the LADO.

All low-level concerns are recorded in writing, stored securely and reviewed for patterns. Supply agencies or contractor employers will be informed where appropriate. Staff are encouraged to self-refer where they believe their own conduct could be misinterpreted or may have fallen below expected professional standards.

19. Whistleblowing and concerns about safeguarding practice

All staff and volunteers should feel able to raise concerns about poor or unsafe safeguarding practice or failures in Milverton's safeguarding arrangements. Concerns will be taken seriously and staff must not be disadvantaged for raising a genuine safeguarding concern in good faith.

Where a staff member believes a concern has not been acted on, or does not feel able to use the normal internal route, they should use Milverton's whistleblowing procedure or contact an external safeguarding route. The NSPCC Whistleblowing Advice Line is available on 0800 028 0285 and help@nspcc.org.uk.

20. Safer recruitment, vetting and the Single Central Record

Milverton is committed to recruiting adults who are suitable to work with children. Recruitment and vetting arrangements are set out in the Safer Recruitment Policy and will reflect KCSIE 2026, current DBS eligibility rules and the legal definition of regulated activity.

- at least one appropriately trained person participates in recruitment processes;
- identity, right-to-work, employment history, references, qualifications and appropriate criminal-record/barred-list/prohibition checks are completed as required;
- online searches may be undertaken for shortlisted candidates in accordance with KCSIE and the Safer Recruitment Policy;
- the Single Central Record is maintained accurately;
- appropriate checks are completed for self-employed staff, contractors, volunteers and others before access to children is permitted;
- Milverton will apply the 2026 regulated-activity rules, including the removal of the previous "supervision exemption" where relevant to volunteers and work with children;
- there are processes for ongoing suitability and for making DBS/TRA referrals where statutory criteria are met.

21. Professional boundaries, social media and communication

Professional boundaries protect both pupils and adults. Staff must follow the Staff Code of Conduct and use approved school systems for pupil communication.

- Staff must not add, follow, "friend", privately message or otherwise connect with current pupils through personal social-media accounts.
- Staff must not move pupil communication to personal messaging apps, gaming platforms or private email accounts.
- Personal social-media contact with former pupils is strongly discouraged, must never occur while the former pupil is under 18, and must never exploit the prior professional relationship. Staff should seek advice from the Principal/DSL before accepting personal contact from a recent leaver.
- Staff must not take or retain personal photographs, screenshots or recordings of pupils on personal devices except where an immediate safeguarding need requires temporary evidence to be preserved; in such a case the DSL must be informed immediately and the material transferred securely according to instruction.
- Any accidental boundary issue or communication that could be misinterpreted should be self-reported as a low-level concern.

22. Bullying, discrimination, racism and preventative culture

Milverton aims to create a culture of zero tolerance for bullying, cyberbullying, racism, sexism, misogyny/misandry, homophobia, biphobia, sexual harassment/violence, discriminatory or

derogatory behaviour and other forms of violence or conflict. Repeated incidents, or a single serious incident, may become a safeguarding matter and must be considered in that context.

Known incidents are recorded and responded to under the relevant behaviour/anti-bullying procedure. Where an incident indicates significant harm, exploitation, hate crime, child-on-child abuse or another safeguarding risk, the DSL process takes precedence.

23. Curriculum, prevention and pupil voice

Milverton uses its curriculum, wellbeing provision, mentoring and wider pastoral work to help children understand healthy relationships, consent, boundaries, respectful behaviour, discrimination, online safety, harmful content, deepfakes, pornography, misinformation, exploitation, radicalisation, reporting concerns and how to seek help.

Preventative education should be age- and developmentally appropriate and responsive to SEND and other vulnerabilities. Pupils are regularly reminded who they can speak to if they are worried and are encouraged to contribute to the School's safeguarding culture through feedback and pastoral dialogue.

Useful child-facing sources include Childline, CEOP Education, Childnet and the Internet Watch Foundation. Milverton will maintain a short, current list rather than relying on outdated campaign websites.

24. International safeguarding

Some Milverton pupils may live or travel outside England. The fact that local law, custom or family practice differs from the UK does not lower Milverton's safeguarding threshold or make cultural acceptance a determining factor in whether staff report a concern. Milverton's approach remains child-centred and informed by the UN Convention on the Rights of the Child and UK safeguarding principles.

For a pupil outside England, the DSL will identify the appropriate local child-protection, social-care or police route and may seek advice from relevant UK or international agencies where necessary. If there is immediate danger, the local emergency services should be contacted. The School will take account of local law when deciding how a referral can be made, but the child's safety remains the primary consideration.

Where a family moves between jurisdictions, the DSL will consider what safeguarding information should be shared with the receiving setting or agency and will record the basis for the decision.

25. Complaints, support and learning from concerns

Milverton's Complaints Procedure is available to pupils, parents/carers and staff. A complaint that constitutes a safeguarding concern or allegation about an adult will be handled under the safeguarding procedure rather than solely as a complaint.

Children, parents and staff affected by safeguarding concerns may seek support from the DSL/DDSL. Where appropriate, Milverton will signpost to external specialist services.

Safeguarding incidents, allegations and low-level concerns will be reviewed for lessons learned. Where weaknesses in systems, training, technology, recruitment or culture are identified, action will be taken promptly.

26. Policy review and publication

This policy is reviewed at least annually and is updated sooner if there is a significant change to legislation, statutory guidance, Milverton's operating model or technology, or if a safeguarding incident or review identifies a need for change. The current approved version will be made available to parents/carers and staff and published on the School website as appropriate.

Appendix 1 - Indicators of harm and abuse

These indicators are not exhaustive and are not diagnostic. Staff should report concerns rather than attempting to determine whether abuse has taken place. In an online setting some physical indicators may be less visible, making changes in behaviour, attendance, engagement, communication and online activity particularly important.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. It may also include fabricated or induced illness. Possible indicators include unexplained or inconsistent injuries, repeated injuries, fear of going home, unusual explanations, reluctance to seek medical help or behaviour that suggests fear of a particular adult.

Emotional abuse

Emotional abuse is persistent emotional maltreatment that causes severe and adverse effects on emotional development. It may include persistent criticism, belittling or name-calling; making a child feel worthless or unloved; silencing them; age-inappropriate expectations; overprotection; serious bullying; or exposing a child to the ill-treatment of others. Possible indicators include anxiety, withdrawal, aggression, low self-esteem, fearfulness, extreme compliance, self-harm, social isolation or a marked change in behaviour.

Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activity, whether or not the child understands what is happening. It includes contact and non-contact abuse, grooming and online sexual abuse. Possible indicators include a direct or indirect disclosure, sexual knowledge or behaviour that is not age/developmentally appropriate, unexplained changes in behaviour, fear, withdrawal, self-harm, sexualised online activity, coercion, pregnancy or sexual-health concerns.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to impair health or development. It can include inadequate food, clothing, shelter, supervision, protection from harm, medical care or emotional responsiveness. Possible indicators include persistent hunger, poor hygiene, unsuitable clothing, unmanaged health needs, tiredness, repeated absence, developmental concerns, poor supervision or a child regularly being left responsible for themselves or others beyond what is appropriate.

Online and extra-familial harm

Staff should also be alert to grooming, exploitation, threats, coercion, sexualised contact, harmful group chats, image-based abuse, financial scams/exploitation, extremist content, serious violence, gang association, trafficking, cybercrime and other harms that arise outside the family. Online and offline harms commonly overlap.

Appendix 2 - Staff safeguarding action guide

1. Recognise: notice a concern, disclosure, change in behaviour/attendance, online incident or information from another person.
2. Respond: listen, reassure, clarify only what is necessary, do not investigate and do not promise secrecy.
3. Protect: if there is immediate danger or serious immediate harm, call 999. Preserve relevant evidence without forwarding or unnecessarily viewing harmful imagery.
4. Report: contact the DSL/DDSL immediately. A concern about an adult follows sections 17 or 18; a concern about the Principal goes to the Chair/Proprietor or LADO as appropriate.

5. Record: complete a clear factual Safeguarding Concern Record as soon as possible, including dates, times, words used, actions taken and who was informed.
6. Follow up: if you remain concerned, ask what action has been taken. Escalate or make a direct referral if necessary. Safeguarding is not complete simply because a concern has been passed on.

Do not

- promise to keep a safeguarding disclosure secret;
- confront an alleged abuser or alleged perpetrator yourself;
- conduct your own investigation or ask repeated/leading questions;
- forward, screenshot, download or print nude/semi-nude images of a child;
- delay reporting while waiting for more evidence;
- use personal devices or personal accounts to manage safeguarding information unless required in an immediate emergency and then only until it can be transferred securely.

Appendix 3 - Key guidance and external support

- [Keeping Children Safe in Education 2026](#)
- [Working Together to Safeguard Children 2026](#)
- [Information sharing advice for safeguarding practitioners](#)
- [Prevent duty guidance: England and Wales \(2023\)](#)
- [Teaching online safety in schools](#)
- [DfE filtering and monitoring standards](#)
- [Report child abuse / local authority routes](#)
- [Forced Marriage Unit](#)
- [FGM mandatory reporting procedural information](#)
- [NSPCC Whistleblowing Advice Line](#)

Useful telephone contacts

- Emergency services: 999
- Police non-emergency: 101
- Childline: 0800 1111
- NSPCC adult helpline: 0808 800 5000
- NSPCC Whistleblowing Advice Line: 0800 028 0285
- Forced Marriage Unit: 020 7008 0151 / +44 (0)20 7008 0151 from overseas

Policy details

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