

Safeguarding Policy

This policy applies to:
Brighton College, BCPS



If this is an employee policy, please indicate who this applies to:
All employees

Policy owner:	Paul Coventry (Designated Safeguarding Lead) Gareth Jackson (Designated Safeguarding Lead, BCPS)
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Key changes to previous version:	Key personnel changes.
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	Name (role):	Signature:	Date:
Policy owner:	Paul Coventry (Designated Safeguarding Lead)	P Coventry	14 August 2025
	Gareth Jackson (Designated Safeguarding Lead, BCPS)	G Jackson	14 August 2025
SMT owner (if different):	As above		
Legal Counsel:	Matthew Burgess	M Burgess	August 2025
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1. Introduction

Brighton College recognises its moral and statutory responsibility to safeguard and promote the welfare of all its pupils. Safeguarding at the College is everyone's responsibility, and all staff (inclusive of teaching, support staff, volunteers, and contractors) have the general legal duty to:

- protect children from abuse.
- be able to identify welfare concerns among pupils and to identify pupils who need additional support.
- be aware of the college's child protection procedures, know how to access them and follow them.
- keep a record of any significant event, complaint, or conversation.
- report any matters of concern to the appropriate person or authority.

This policy has been authorised by the Governing Body and is published on the College's website. It applies wherever staff or volunteers are working with pupils even where this is away from the site, for example at an activity centre or on an educational visit.

As the College is also a charity, the governors have considered their responsibilities as trustees under charity law, and specific safeguarding recommendations included in publications from the Charity Commission, including [Safeguarding and Protecting People For Charities and Trustees](#) and [Strategy for Dealing with Safeguarding Issues in Charities](#). For the purposes of charity law and reporting obligations to the Commission as regulator, the term 'safeguarding' includes the range of measures in place to protect the people who encounter the College through its work from abuse and mistreatment of any kind.

In this policy, the Head refers to the Head Master of Brighton College, and the Headmaster of Brighton College Prep School (BCPS). 'DSL' refers to the 'Designated Safeguarding Lead.' The College refers to both the Senior School and BCPS.

In ensuring this policy is put into practice in the College and BCPS, where the DSL is unavailable, one of the other Deputy DSLs (DDSL) will act to fulfil the responsibilities and roles outlined below. Where the Head Master is unavailable, the Deputy Head will act to fulfil the roles outlined in this policy.

2. Policy Statement

This policy applies at Brighton College and Brighton College Prep School. It is designed to ensure the welfare of pupils and visiting young people both within school and on authorised activities away from the site, such as trips and expeditions. The policy is reviewed and updated at least annually or when required by legislative change.

Brighton College is committed to safeguarding and promoting the welfare of children and young people and fostering a culture of safety, equality, and protection. It expects all staff to share this commitment, creating an open environment where staff and pupils feel able to raise concerns. Concerns will be listened to with a readiness to involve support services and other agencies, as necessary. We endeavour to provide a safe and welcoming environment where children are listened to, respected, and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support and protection.

Paramount in all dealings, staff should be asking what is in the best interests of the child and ensure all the College's systems, processes and policies operate with the best interests of the child at their heart.

3. Safeguarding contact details

Brighton College Safeguarding Team			
Designated Safeguarding Lead:	Paul Coventry	DSL@brightoncollege.net pcoventry@brightoncollege.net	01273 704 325 07586 670392
Deputy DSL:	Chris Fowler	cfowler@brightoncollege.net	01273 704 220
Deputy DSL:	Jane Hamblett-Jahn	jhamblettjahn@brightoncollege.net	01273 704 239
Deputy DSL:	Georgina Clarke	gclarke@brightoncollege.net	01273 704 381
Deputy DSL:	Lucinda Fowler	lfowler@brightoncollege.net	01273 704 840
Deputy DSL:	Natasha Marchant	nmarchant@brightoncollege.net	01273 704 361
Deputy DSL:	Sarah Le Grice	slegrice@brightoncollege.net	01273 704 282
Deputy DSL:	Adrian Ford	aford@brightoncollege.net	01273 704 221
Deputy DSL:	Hannah Kulin	hkulin@brightoncollege.net	01273 704 334
BCPS Safeguarding Team			
Designated Safeguarding Lead:	Gareth Jackson	gjackson@brightoncollege.net bcpsdsl@brightoncollege.net	01273 704 212 07586 686 787
Deputy DSL:	Julia Tooke	jtooke@brightoncollege.net	01273 121 642
Deputy DSL (EYFS):	Kate Gari (Designated EYFS Protection Person)	kgari@brightoncollege.net	01273 704 259
Deputy DSL:	Jo Ford	jford@brightoncollege.net	01273 704 200
Deputy DSL:	Lucy Amos	lamos@brightoncollege.net	01273 704 200
Deputy DSL:	Simon Lucas	slucas@brightoncollege.net	01273 704200
Deputy DSL:	Kathryn Cornish	kcornish@brightoncollege.net	01273 704 259

4. Policy Details

4.1 Legislative guidance

As with all other schools in the UK, we work within a legislative framework that seeks to safeguard and promote the welfare of all children. Our Safeguarding Policy has been developed in accordance with the principles established in the following:

- [Working Together to Safeguard Children](#)
- [Keeping Children Safe in Education](#) (KCSIE)
- [Disqualification under the Childcare Act 2006](#) (DfE)
- [Revised Prevent duty guidance for England and Wales](#)
- [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government)
- [Multi-agency statutory guidance on female genital mutilation](#) (HM Government)
- [What to do if you're worried a child is being abused: advice for practitioners](#) (HM Government)
- [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (HM Government)
- [Children missing education](#) (DfE)
- [Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation](#) (DfE)
- [Teaching Online Safety in Schools](#)
- [Safeguarding children and protecting professionals in early years settings: online safety considerations](#) (UKCIS)
- [Relationships education, relationships and sex education and health education guidance](#) (DfE)
- [Meeting digital and technology standards in schools and colleges](#) (DfE)

4.2 What to do if you suspect a child is at risk of harm

- If a member of staff is concerned that a pupil may be suffering harm or is at risk of harm, they must act on this immediately;
- In an emergency, take the action necessary to help the child, for example, call 999;
- Report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the guidance in [Section 6](#) of this policy should be followed;
- If the DSL is not available, ensure the information is shared with a Deputy DSL that day;
- Where a staff member has access, the concern should be logged on CPOMS and tagged as 'Safeguarding Review Required,' which will trigger an immediate alert to the Safeguarding Team;
- If there is a risk of immediate serious harm to a child and it is not possible to report the matter in accordance with this procedure, a referral should be made to local children's services or, if appropriate, the police immediately;
- Never start your own investigation;
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- Support is available to staff following an incident or crisis.

[Appendix 8.1](#) shows the Flowchart for following through a concern at Brighton College.

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning, or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Record these early concerns on CPOMS and pass them to the DSL immediately. If the child does begin to reveal that they are being harmed or are at risk of harm, including radicalisation, you should follow the advice in section 4.3 of this policy.

4.3 Pupil disclosures

It takes a lot of courage for a child to disclose that they are being abused, neglected and / or exploited. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

The '6 Rs' give guidance to managing a disclosure in a safe and supportive way.



Any staff member can make a referral to children's social care although where possible, there should be a conversation with the DSL to agree a course of action.

Staff should follow the reporting procedures outlined in [Appendix 8.1](#). Staff may also share information directly with Brighton and Hove Children's Service (Front Door for Families), the police or the NSPCC if:

- the situation is an emergency and the DSL, a Deputy and the Head are all unavailable
- they are convinced that a direct report is the only way to ensure the child's safety
- when there is a concern of immediate danger to a child, staff must call 999.

When referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

Other ways to report your concerns:

Call the local Police – 101 for non-emergency police

Contact the NSPCC – for help if you are unsure whether to report your concerns. Call 0800 800 5000 to speak in confidence, or text anonymously to 88858.

For concerns relating to radicalisation:

Call the Brighton and Hove Prevent Lead 01273 574 661 where there are concerns relating to extremism and radicalisation. Further guidance can be found in the College's Prevent Policy.

Department for Education Helpline for non-emergency advice on radicalisation: 020 7340 7264 and counter.extremism@education.gsi.gov.uk.

Further local authority details can be found in section [4.5](#) of this document.

4.4 Recognising Abuse and Vulnerability:

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is, therefore, important that all staff understand their responsibility to identify, act on, and refer the early indicators of abuse, neglect, and exploitation.

Recognising Abuse

Abuse involves maltreatment of a child. The definition of child abuse is wide in order to cover all forms of cruelty that children may endure in their lives. Somebody may abuse or neglect 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 known to them or, more rarely, by others. Abuse can happen wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can take four main forms:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may

also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of others, including domestic abuse. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse involves forcing or enticing a 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. 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.

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.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate carers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

[Appendix 8.2](#) of this policy sets out further detail of possible signs of abuse and grooming.

Domestic Abuse

Domestic Abuse is defined as 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:

- psychological;
- physical;

- sexual;
- financial; and
- emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and / or violence, including where they see, hear, or experience its effects, can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

[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.

Self-harming, eating disorders, anxiety or depression

It is recognised that some young people have a problem with self-harming/eating disorders /anxiety/depression and that this may be as a result of unhappiness in some aspect of their life (which may, in the worst-case scenario, be linked to a child protection issue). Staff (especially those in positions of pastoral responsibility) should be vigilant and aware of the causes and symptoms of all of the above and should refer any cases to the Health Centre as soon as possible. Health Centre staff will keep the Designated Safeguarding Lead informed.

More detailed information can be found in the separate College and BCPS Mental Health and Wellbeing policies, located on the Staff Hub.

Extremism, Radicalisation, Terrorism

Please see the College's Prevent Policy (also applicable to BCPS) for further guidance. The Deputy Head (Pupils) keeps a log of all visiting speakers to ensure suitability in line with our Prevent duties.

Female Genital Mutilation (FGM)

There is a **specific legal duty for teachers** to report to the police cases where an act of FGM appears to have been carried out on a girl under the age of 18. In addition, and applicable to all staff (not just teachers), concerns about FGM should be raised with the DSL for referral to children's social care if appropriate.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. This includes so-called 'honour' based abuse. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk, but if there are two or more indicators present this could signal a risk to the child or young person.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the [Multi-Agency Practice Guidelines](#) (currently section B1.2).

Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Children who may be at increased risk of harm

Some children may be at increased risk of harm as a result of neglect, exploitation and / or physical, sexual or emotional abuse.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

To ensure that all our children receive appropriate protection, we will give special consideration and attention to children who fall into one or more of the following categories:

Children with a disability or who have Special Educational Needs (SEND)

Barriers may exist in recognising or communicating about abuse, neglect and exploitation that may be present for a child with SEND. Assumptions may be made that behaviour, mood or injury may relate to the condition, without exploring the possibility of abuse.

Children with SEND may be disproportionately impacted by factors like bullying without outwardly showing any signs, or more prone to peer group bullying or isolation than other children, making them even more vulnerable. They may be unable to understand the difference between fact and fiction in online content or may fail to appreciate the consequences of repeating the content/behaviours in school.

'Looked After' Children (LACs) or children in care, including Previously LACs

The most common reason for children becoming looked after is as a result of abuse and / or neglect. All schools have a 'Designated Teacher' who keeps a register of all looked after pupils and has responsibility for promoting the educational achievement of pupils who are looked after. In the College, this person is Hannah Kulin; in BCPS it is Gareth Jackson.

The Designated Teacher will provide relevant staff with information to ensure that children who have specific care arrangements are supported appropriately by school staff. The College will hold information regarding the care arrangements and the level of authority delegated to the carer.

Previously looked after children (care leavers) can remain vulnerable. Relevant staff will be supported by the Designated Teacher to ensure they have the skills and confidence to appropriately support previously looked after children.

The DSL should have information regarding the child's social worker. The government's guidance on 'Promoting the Education of looked-after and previously looked-after Children' (Feb 2018) can be found [here](#).

Children who are lesbian, gay, bisexual, or questioning their gender

The College works hard to ensure that every individual feels included, valued and supported.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived

by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where children can speak out or share their concerns with members of staff.

We will also give special consideration and attention to children who fall into one or more of the following categories:

- are disabled or have certain health conditions and have specific additional needs.
- have special educational needs (whether or not they have a statutory Education, Health and Care plan).
- have a mental health need.
- are young carers.
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- are frequently missing / go missing from care or from home.
- are at risk of modern slavery, trafficking, sexual or criminal exploitation.
- are at risk of being radicalised or exploited.
- have a family member in prison or are affected by parental offending.
- are in a family circumstance presenting challenges for a child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- are misusing alcohol and other drugs themselves.
- have returned home to their family from care.
- are at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- are a privately fostered child, or
- are unexplainably or persistently absent from education, including unexplainable or persistent absences for part of the school day.

4.5 Local Authority support.

Brighton and Hove Children's Services use a [Continuum of need](#) to categorise the varying levels of support children and families may need. The safeguarding team must have due regard to this document to ensure any action taken is in line with agreed local procedures.

Further information and guidance is clarified in ['Supporting Families in Brighton and Hove'](#)

College safeguarding team members are appropriately trained in understanding the role of external agencies and the levels of support given, including Child Protection Plans and Child in Need Plans. Where a child is subject to an intervention from a social worker, a member of the safeguarding team will actively support the family alongside the relevant Housemaster/ Housemistress.

All staff should be prepared to identify children who may benefit from 'early help'. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Staff training specifically addresses some typical factors which might indicate that a child might benefit from early help, and more detailed guidance is available in both KCSIE and Working Together to Safeguard Children.

No matter where pupils reside, the first port of call is the Brighton and Hove authority, as stipulated in Section 47 of the Children's Act. The Brighton and Hove Children's Services contact details, along with our neighbouring local authorities, are listed below.

Brighton and Hove Council	East Sussex County Council	West Sussex County Council
Front Door for Families 01273 290400 Front Door for Families	Single Point of Access 01323 464222 East Sussex SPOA	Integrated Front Door (IFD) 01403 229900 WSCC Integrated Front Door
Emergency Duty Service 01273 335905/6	Emergency Duty Service 01273 335905/6	Emergency Duty Service 0330 222 6664
LADO 07795 336355	LADO 01323 466606 / 07825 782793	LADO 0330 222 6450

4.6 Notifying parents

The College will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the College believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from the local authority. This is also subject to advice from the LADO if the allegation involves a member of staff.

For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

4.7 Action by the DSL - Referral

The DSL (or in their absence a Deputy DSL) will make a referral to Brighton and Hove Front Door for Families (or the child's local children's services if directed to do so by Brighton and Hove) immediately if it is believed that a child has suffered or is at risk of suffering harm.

In situations where a pupil is not at risk of suffering harm but is instead in need of additional support from external agencies, the DSL will still liaise with the local authority in accordance with inter agency procedures and, depending on their advice, will ensure that all appropriate actions are taken to gain access to the most appropriate support.

Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures set out in [Section 6](#) of this policy.

In cases of possible radicalisation, the DSL will consider a referral to the police using the Prevent National Referral Form. Full government guidance on the Channel programme can be found [here](#).

5. AREAS OF COLLEGE LIFE UNDERPINNED BY SAFEGUARDING

5.1 Harmful behaviour by other children – child-on-child abuse

Children may be harmed by other children or young people. All staff working with children are advised to maintain an attitude of ‘it could happen here.’ This is especially important when considering child-on-child abuse. All staff should be aware of how **child-on-child abuse** may manifest itself:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers (sometimes called teenage relationship abuse);
- physical abuse such as hitting, kicking, shaking, biting, hair-pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and / or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and / or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- 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;
- consensual and non-consensual sharing of nudes and semi-nude images and / or videos (also known as sexting or youth-produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

The College seeks to minimise the risk of child-on-child abuse through appropriate supervision of pupils, particularly in relation to the boarding community. Pupils are regularly educated on high standards of courtesy and respect expected in the language and behaviour of pupils to one another, whether online or in person.

Staff are clear that child-on-child abuse is unacceptable and will be taken seriously; so-called ‘banter’ is not an acceptable vehicle for unkindness or abusive behaviour towards others and specific PSHEE resources on banter and unkindness have been developed and are taught each year.

Staff will be aware of the harm caused by bullying and will use the College’s anti-bullying procedures where necessary. The Deputy Head (Pupils) is also a Deputy Designated Safeguarding Lead. They will ensure that all staff are aware that the Safeguarding Policy may also need to be considered alongside anti bullying procedures. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and local services in accordance with the procedures in this policy.

5.2 Investigating child-on-child abuse

Regardless of the form in which child-on-child abuse manifests itself, the College's initial response will be to support all members of the College community who may be involved, whilst remaining mindful of the wider College community, too.

Until investigations have been undertaken and findings made, the College will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation.

The Exclusion, Removal and Review Policy sets out the College's approach to investigations into pupil behaviour. The College is guided by Part 5 of KCSIE, which contains information about how schools should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and / or online.

Investigations into alleged child-on-child abuse require particularly sensitive handling, as the College will be dealing with potentially traumatic and conflicting accounts from pupils. The College will usually seek to involve parents at an early stage so that pupils, whether alleged victims or perpetrators, have family support. The College may seek early advice from the local Educational Welfare Officer/Front Door for Families. In the case of alleged behaviour that is potentially criminal, the College will seek advice from the Police before carrying out any investigations.

With regard to the alleged perpetrator(s), disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent the College from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. The College will consider this on a case-by-case basis, with the DSL taking a leading role and coordinating closely with other agencies. The College always considers if, by taking any action, it would prejudice an investigation and / or any subsequent prosecution.

In line with KCSIE, the College will seek to give alleged victims as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This is balanced with the College's duty and responsibilities to protect other children.

A pupil (or pupils) against whom an allegation of abuse has been made may be suspended from the College during the investigation.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the College will ensure that, subject to the advice of the local authority, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult: more information is contained in [PACE Code C](#). In the case of pupils whose parents are abroad, subject to separately satisfied risk assessments for the pupil and an identified Education Guardian, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate them if it is necessary to suspend them during the investigation.

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the College will work with other relevant agencies to

maintain the safety of the whole College community. Young people who display such behaviour may be victims of abuse themselves and child protection procedures will be followed for both victim and perpetrator – i.e. all children involved will be treated as being “at risk”.

5.3 Sexual Violence and Sexual Harassment

Brighton College has a zero-tolerance approach to sexual violence and sexual harassment. A blind eye will never be turned, and action will always be taken.

The full Government guidance on sexual violence and sexual harassment can be found in Part 5 of KCSIE.

It is important that **all** victims are taken seriously and offered appropriate support. Evidence shows girls and children with SEND are at greater risk. However, it should be noted that boys are not immune to the threat and impact of sexual violence and harassment.

Staff at Brighton College are all expected to be aware of the importance of:

- making clear that sexual violence and sexual harassment is never acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter,” “part of growing up,” “just having a laugh” and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting up skirts. Staff must understand that dismissing or tolerating such behaviours risks normalising them.

Further detail regarding how seriously the school takes sexual misconduct, and the disciplinary sanctions and processes to be followed in the event of an allegation, are laid out in the Behaviour Policy and the Exclusion, Removal and Review Policy.

Sexual violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. A full explanation of what constitutes a sexual offence can be found in Part 5 of KCSIE.

Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. 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. Sexual harassment can cross a line into sexual violence and in considering this the College will take into account the experience of the victim.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim
- displaying pictures, photos, or drawings of a sexual nature

- upskirting
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and / or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and / or videos. Taking and sharing nude photographs of those aged under 18 is a criminal offence
 - sharing of unwanted explicit content
 - sexualised online bullying
 - unwanted sexual comments and messages, including on social media
 - sexual exploitation; coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they're not comfortable with online

5.4 Responding to a report of sexual violence or sexual harassment

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the 6Rs documented in section [4.3](#) of this policy. Reports should be recorded in line with the reporting process in Appendix [8.1](#) and reported directly to the DSL.

5.5 Child Sexual Exploitation (CSE)

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.

Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Multi-agency working and information sharing are vital in tackling all forms of abuse, but it is clear that they are particularly important in identifying and preventing child sexual exploitation.

5.6 Sharing nudes and semi-nudes/Sexting (Youth Produced Sexual Imagery)

The College's approach has full regard to UK Council for Internet Safety guidance in this area, which is a useful resource for all staff: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

The meaning of 'sending nudes or semi nudes' is the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child or young person. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Staff should be alert to any imbalance of power (such as age difference), coercion or pressure applied to another individual to share sexual images of themselves.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year-olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

What to do if an incident comes to your attention

Report it to the DSL immediately.

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download it – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and / or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

Further details about staff viewing pupils' devices or phones can be found in the College's 'Searching Pupils, their Rooms, Belongings and Devices' Policy. This sets out the context in which electronic devices may be searched by staff, and makes very clear that if a Child Protection issue is suspected, the device must be handed to the Designated Safeguarding Lead without any content first being viewed. Part 5 of KCSIE makes it clear that staff should not view or forward alleged illegal images of a child, and signposts advice for staff on what to do when viewing an image is unavoidable.

The Designated Safeguarding Lead will liaise closely with the relevant members of staff regarding appropriate pastoral and disciplinary responses. The DSL may be duty-bound to inform the local authorities and the Police.

In addition to making the sanctions for involvement in youth produced sexual imagery or 'youth involved' sexual imagery very clear, the College will provide appropriate pastoral support to the perpetrator and the victim.

5.7 Sexually active pupils

If a pupil reveals that they are sexually active it may be a child protection issue. The member of staff concerned should report this to the Designated Safeguarding Lead. They will then decide, having due regard to the pupil's age and maturity, whether this is indeed a child protection issue. If so, steps should be taken to arrange appropriate support. The College Head of Health

Centre, HMMs, parents and Deputy Head (Pupils) will be consulted where appropriate. If sexual activity were to take place on school premises or on a school trip (when normal School rules always apply), this would also be considered a disciplinary matter, to be handled by the Deputy Head (Pupils) (see the College's Behaviour Policy).

The DSL will, when considering who needs to be informed, consider matters of the age of the pupils involved and the possibility of child-on-child abuse.

5.8 Bullying

Bullying is a subset of abuse that can take different forms, including: physical, emotional, verbal, ostracism, homophobic and gender-related bullying and / or cyber bullying (which includes abusive messages posted online or sent by text or email or via other means using technology). The College is determined that no kind of bullying will be tolerated by pupils, parents or staff at the College. Comprehensive details are contained in the College and BCPS Anti-bullying policies.

5.9 Online Safety

Details relating to Online safety can be found in the Online Safety Policies (College and BCPS).

Where there is a safeguarding concern in relation to an aspect of a child's safety online, staff should follow the guidance set out in section [4.2](#) and [4.3](#) of this policy and report concerns using procedures set out in [Appendix 8.1](#).

The DSL takes lead responsibility for ensuring that the College has effective filtering and monitoring on its IT systems. Further details can be found in the Online Safety policies.

5.10 Boarding

Children can be particularly vulnerable in residential settings and boarding staff should be alert to pupil relationships and the potential for child-on-child abuse. Boarding policies and procedures, including additional induction and refresher training provided to boarding staff, will make appropriate provision for responding to these issues.

The College boarding houses will have regard to the National Minimum Standards for boarding schools. These include:

- I. Briefing for senior pupils given positions of responsibility over other pupils, on appropriate action to take should they receive any allegations of abuse, or have any concerns or suspicions about the behaviour of a member of staff or fellow boarder;
- II. Safeguarding and Child Protection briefing for House Prefects early in the new academic year to outline the roles and responsibilities of the adults they can turn to in and outside school, including the provision and advertisement of how to contact a School-designated 'Independent Listener', a suitably qualified, vetted volunteer, who is not employed by the School, that pupils can raise concerns with;
- III. The College's Missing Pupil policy, known to staff and used in practice, includes procedures for searching for and, if necessary, reporting any boarder missing from School and the knowledge and means of reporting concerns or allegations to the local authority team.

Should an allegation of abuse be made against a member of boarding staff (or the member of boarding staff be charged with abuse), the Head Master, LADO and Designated Safeguarding Lead will agree on the appropriate steps to take. It may involve arrangements being made for accommodation away from children until the results of the investigation have been disclosed. This

may also concern a member of the Boarding House staff who lives in close proximity to the school site in school accommodation.

5.11 Mental Health and Wellbeing

The College fully recognises the challenges faced by pupils in regard to mental health and wellbeing. These are themes that are addressed in a number of policies, notably the College and BCPS 'Promoting Mental Health and Wellbeing' policies.

5.12 Pastoral and Safeguarding Education

Pupils are educated about safeguarding, wellbeing and mental health through many areas of school life: the Assembly programme in Chapel and in Houses, through the PSHEE curriculum, tutor times, the ICT curriculum, parents' pastoral seminars, and stand-alone talks. Pupils are informed, empowered and encouraged to communicate with appropriate people if they have any concern or question. They are regularly reminded about who they can speak to if they are concerned for themselves or a fellow pupil, or if they are concerned about the behaviour of an adult or peer.

As well as a wide range of trusted adults, the College also has a Peer Mentor scheme and Prefect appointments through which older pupils can provide appropriate support to pupils.

Information can be found in the College and BCPS PSHEE policies and Promoting Mental Health and Wellbeing policies.

5.13 Missing Pupils

Staff should be alert to the possible safeguarding implications of a pupil running away or deliberately going missing.

Unexplained absences of pupils on a Child Protection Plan

The Designated Safeguarding Lead must notify Children's Services if there is an unexplained absence of more than two days of a pupil who has a Child Protection (CP) plan. In such a case, where the child is not at morning registration, contact is made as soon as possible to find out what explanation is given for absence. Depending on the response received, a referral will be made more urgently. In practice, this is flagged up by College HMMs or School secretaries (in BCPS) who will alert the Designated Safeguarding Lead (or a member of the Safeguarding team) immediately.

Children who are absent from education

Children being absent from education unexpectedly, for prolonged periods and / or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation. In addition to the procedures to follow if a child goes missing from the College or BCPS (see separate Missing Pupil Policies), staff should have in mind the potential safeguarding concerns relating to travelling to conflict zones, FGM and forced marriage.

In order to safeguard pupils, the College takes the following steps:

- Maintain an admission and an attendance register.
- Review the attendance percentages regularly to spot patterns of high absenteeism: an attendance percentage below 90% will trigger consideration as to the appropriate next course of action, whether pastoral, disciplinary, parental or child protection.
- Inform Brighton and Hove Local Authority (copying in, where the child is normally resident in another local authority, that local authority also) if a child is to be removed from the admission

register at non-standard transitions, i.e. where a compulsory school-aged child leaves a school before completing the school's final year. A pupil's name can only be deleted from the admission register for a reason set out in the School Attendance (Pupil Registration) (England) Regulations 2024 and the school has regard to [Working together to improve school attendance \(2022\)](#) for advice on deletions from the roll.

- Inform the local authority if any pupil fails to attend school regularly, or if any pupil has been absent without the school's permission for a continuous period of 10 days or more.
- Endeavour to hold more than one emergency contact number for each pupil.

All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any pupil missing from school. The procedure includes the requirement to record any incident, the action taken, and the reasons given by the pupil for being missing. Schools have a duty to report children missing education.

Please see the Missing Pupil Policies and the Attendance, Registration and Absence policies for further details.

6. Concerns About Staff and Other Adults

6.1 Concerns about/Allegation against a member of staff and other adults

If you are concerned about the behaviour of a colleague towards a pupil or pupils, you may worry that you have misunderstood the situation or wonder whether a report could jeopardise a colleague's career. However, any concern about a member of staff must be raised immediately regardless of how unlikely it seems that there would be any substance to the concern. No further action may be necessary, but it is important that such information is brought to the school's attention as soon as possible. You must remember that in all situations the welfare of the child is paramount.

Our reporting procedures for managing concerns/allegations against staff (including Governors and other volunteers) are in line with Part Four of Keeping Children Safe in Education and local safeguarding partner arrangements. They apply when staff have, or are alleged to have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

They also apply to so-called 'low level' concerns that do not meet the thresholds above – see [6.4](#) of this policy for more information. Low level concerns can be reported via the low level concerns form on the Staff Hub. Alternatively, the Head Master and DSL can be approached directly.

When you report a concern you can expect:

- your identity to remain confidential (if this is your wish), unless you are later required to act as a witness in court proceedings;
- to be protected as far as possible from victimisation or harassment;
- for an initial inquiry to take place to identify any action necessary;

- Children's Services and the Police to be involved if the concern relates to abuse, neglect, exploitation or the potential commission of a crime;
- written confirmation within the timescales given in the whistle-blowing procedures that your concern has been received and is being dealt with; and
- although we are unable to provide a 'running commentary' of ongoing cases, we will endeavour to inform you of the final outcome, subject to the constraints of confidentiality and legal advice (please note, if restrictions are in place, or if we have received specific direction from Children's Services or the Police, communication with the reporting party might not be permissible).

If you have child protection concerns about the behaviour of a colleague, or about a school practice, which is likely to put pupils at risk of abuse or other serious harm, you must report it immediately, using one of the steps outlined below:

- **Allegations against staff, volunteers or contractors:** If you are making an allegation or complaint against any member of staff (including the DSL or a DDSL), volunteer or contractor, you should report it immediately to the Head Master. The Head Master will liaise with the DSL about an allegation concerning a staff member where appropriate and may ask them to lead on an investigation.
- **Allegations against the Head Master or the Principal:** If you are making an allegation against the Head Master, you should report it to the Chair of the Board of Governors (via the Bursar's EA/Clerk to the Governors).
- **Allegations against a staff member who is no longer working at the school or no longer teaching** will be referred to the police and any relevant authorities. Historical (non-recent) allegations of abuse will be referred to the police and to the LADO.

6.2 What happens when an allegation has been made?

We will deal with any allegation of inappropriate behaviour that harms, or may cause harm to a pupil, as an immediate priority.

If an allegation is made against anyone working or volunteering at the school, we will not undertake our own investigation into the allegation without prior consultation with the Local Authority Designated Officer (LADO), or in the most serious cases, the police, so as not to jeopardise statutory investigations. It is important that staff do not carry out their own investigations prior to informing the Head Master or DSL for the same reason. In borderline cases the Head Master and DSL are allowed to informally discuss the issue with the LADO on a 'no names' basis.

Once an allegation has been made, which appears to meet the reporting criteria either the Head Master or DSL, depending on who the allegation has been made against, will immediately contact the LADO to discuss the nature, content and context of the allegation and agree a course of action. The LADO must be informed within one working day of any allegation reported to the school that appears to meet the criteria or of any allegations that are made directly to the police. All discussions with the LADO will be recorded in writing. The College will follow advice from the LADO about how to approach the matter in question, whether the police are to be involved and whether there is to be a strategy meeting. We will also take direction from the LADO as to what we may communicate to:

- a) the person about whom allegations have been made,
- b) the person who has raised the allegation, and

c) (if it concerns a pupil) their parents.

The Head Master or DSL will ensure that the individual against whom the allegation has been made is notified as soon as possible and given an explanation of the likely course of action (unless there is an objection from the police). A named representative will be appointed to keep the individual informed of the progress of the case and to arrange appropriate support.

Careful consideration will be given to whether the circumstances of the case warrant suspension whilst the allegation is investigated or whether alternative arrangements can be put in place. Alternative accommodation will be arranged (away from pupils) in cases where a member of boarding staff is suspended pending an investigation of a child protection nature.

The Head Master or DSL will, after consultation with the LADO and / or the police, inform the parents and provide regular updates as soon as permissible.

Where an allegation is made against a staff member not directly employed by us, such as supply or agency staff, the Head Master or DSL will immediately contact both the company concerned and the LADO to discuss the nature, content and context of the allegation, in order that all parties can work together to agree a course of action. We will continue to support any investigation that is required.

6.3 How an individual will be treated if an allegation is raised against them

The College's Disciplinary Policy may apply in the event of an allegation being made.

The College will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions will apply up to the point where the accused person is charged with an offence, or the Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

Allegations found to be malicious or false will be removed from the personnel record of the individual concerned. In all other cases a written record of the decision will be placed on their file in accordance with KCSIE and a copy provided to the individual concerned. Allegations which are false, malicious, unfounded, or unsubstantiated will not be included in the individual's future references.

If a report is determined to be unsubstantiated, unfounded, false, or malicious, the DSL will consider whether the child and / or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Services may be appropriate.

6.4 Reporting low level concerns about adults working for or on behalf of the College

Concerns that do not meet the harm threshold are called low level concerns. Examples of these could be using inappropriate language with pupils, being over-friendly, showing favouritism. Low level concerns should still be reported to encourage an open and transparent culture, enabling the school to identify concerning, problematic or inappropriate behaviour early, to minimise the risk of abuse and to ensure that adults working in or on behalf of the College are clear about professional boundaries and how to act within those boundaries.

Low level concerns will be recorded and dealt with effectively and sensitively. The school will take the following actions in relation to low level concerns and / or allegations which do not meet the 'harm' threshold:

- If the concern has been raised by a third party, the Head Master will appoint an investigator to collect as much evidence as possible by speaking directly to the person who raised the

concern (unless it has been raised anonymously) and to the individual involved and any witnesses.

- All low-level concerns will be recorded in writing.
- The record will include details of the concern, the context in which the concern arose, the investigation(s) carried out and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- The information collected will help to categorise the type of behaviour and determine what further action may need to be taken.
- These records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- As part of the annual review of safeguarding, these records will be reviewed at least annually so that potential patterns of concerning, problematic or inappropriate behaviour can be identified which will be addressed either through the school's disciplinary procedures or (where a pattern of behaviour moves from a concern to meeting the harms threshold) after referral to the LADO.
- Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur. Amendments to policies and training will be considered to minimise the risk of it happening again.
- Reports about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.
- Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. A low level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.
- When appropriate, follow-up conversations will take place with the relevant member of staff. The Head has overall responsibility for handling concerns about staff, but in accordance with the local safeguarding guidance, he may delegate follow-up conversations to the DSL.

Low level concerns can be reported via the Low Level Concerns Form on the Staff Hub. Alternatively, the Head Master and DSL can be approached directly. The Head Master will be informed of all Low Level Concerns. Any concerns raised will be treated with the utmost sensitivity.

Staff should feel confident to self-refer if they feel that their behaviour could be misconstrued. All reports of this nature will be handled sensitively and proportionately with the primary aim of supporting and protecting our staff.

6.5 Whistleblowing

Complaints from staff involving wrongdoing in the workplace should be dealt with under the College's Whistleblowing Policy and Disciplinary and Grievance policies.

Where a staff member feels unable to raise an issue with the College, or feels that their genuine concerns are not being addressed, additional whistleblowing channels are open to them, including:

The [NSPCC whistleblowing helpline](https://www.nspcc.org.uk/what-we-do/our-services/whistleblowing/): 0800 028 0285 (8am to 8pm) or email help@nspcc.org.uk

6.6 Abuse of Trust and Inappropriate Relationships

All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

The College's Staff Code of Conduct separately sets out expectations of staff.

7. Management of safeguarding

7.1 Designated Safeguarding Lead

The DSL (and Deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSLs of both the College and BCPS serve on the respective Senior Management Teams.

The broad areas of responsibility for each of the DSLs are as follows and taken from Appendix C of KCSIE; should the College DSL be unavailable, a Senior Deputy DSL will fulfil these roles in the first instance.

The DSL or Deputy DSLs should always be available to discuss safeguarding concerns and their mobile phone numbers are readily available on school literature and lanyards. If the DSL or Deputy DSLs are not available, this should not delay appropriate action being taken. Holiday-time cover is agreed among the DSL and Deputy DSLs. If for any reason they are not contactable, staff may speak to a member of the Senior Management Team (SMT) and / or take advice from local children's services. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

The main responsibilities of the Designated Safeguarding Lead are:

- to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection;
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- to refer all cases of suspected abuse to the local authority children's social care;
- to co-ordinate the child protection procedures in the college, ensuring that all staff are aware of the Safeguarding (Child Protection) Policy and procedures and know how to recognise and refer any concerns;
- to maintain an ongoing training programme for all employees and provide regular safeguarding updates;
- to ensure all members of staff (and volunteers) have read and understood Part 1 of Keeping Children Safe in Education, and Annex B of KCSIE;
- to monitor the keeping, confidentiality and storage of records in relation to child protection, which are kept separate from pupil records;
- to liaise with the Local Authority Designated Officer (LADO) where appropriate and to maintain a close working relationship with Local Safeguarding Partners;
- to keep parents informed of action to be taken under these procedures in relation to their child;
- to liaise with the Head Master to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- to monitor records of pupils in the College who are subject to a child protection plan to ensure that this is maintained and updated as required;

- to liaise with other professionals to ensure that the College contributes to inter-agency working in line with Working Together to Safeguard Children. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children who are subject to child protection plans;
- to ensure that locally agreed inter-agency procedures put in place by the Brighton and Hove Safeguarding Children partnership are followed;
- to advise and act on all suspicions, concerns and / or evidence of the need for children to receive additional support, or of children who have suffered or are likely to suffer abuse, neglect and / or exploitation, which are reported to the DSL;
- where appropriate, to take part in child protection conferences or reviews;
- to inform social services in writing when a child who is subject to a child protection plan moves to another school and to ensure the secure transfer of the child protection file to the pupil's new school (sent separately from the main pupil file) within prescribed time periods;
- to ensure that the College keeps and maintains records of staff training on child protection and safer recruitment procedures;
- to monitor the DBS checking process for all who come into contact with children at the school and the operation of the Single Central Register in association with the Head of HR.
- to notify the Disclosure and Barring Service if the College ceases to use the services of a member of staff because they are unsuitable to work with children;
- to liaise with the local Channel Panel if a child is deemed to be at risk of radicalisation;
- to refer all cases where a crime has been committed to the Police;
- to provide regular case specific updates to the Safeguarding Governor and provide termly reports to the Board of Governors;
- to refer any serious cases to the Charity Commission;
- to ensure that the Safeguarding (Child Protection) Policy is reviewed annually, or more often if necessary, and the procedures and implementation are updated and reviewed regularly;
- to verify that the Safeguarding (Child Protection) Policy is available publicly and parents are aware of the role of the school in referrals about suspected abuse, neglect or exploitation;
- to be responsible for online safety for all members of the school community including understanding the filtering and monitoring systems in place at the College and arranging for them to be reviewed annually to manage risks;
- should the College offer admission to a pupil who is looked after, or has been previously looked after by a local authority, the DSL will ensure that staff have the skills, knowledge and understanding necessary to keep safe any child looked after by a local authority. This would include ensuring that the Designated Teacher has responsibility for their welfare and progress, has up to date assessment information from the relevant local authority, has the most recent care plan and contact arrangements with parents, and delegated authority to carers;
- to consider whether pupils are at risk of extra-familial harm including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence;
- to keep up to date with child protection policies, regulations, and developments, including attending relevant training (at least every two years) provided by the Local Safeguarding Partners, the Safeguarding in Education Team, or a similar provider and;
- to ensure that all staff and visitors are wearing appropriate lanyards to ensure all authorised individuals are easily identified by staff and pupils.

7.2 Deputy DSLs

The main responsibilities of the Deputy Designated Safeguarding Leads are:

- to assume all functions of the Designated Safeguarding Lead in the event of an absence;
- to be appropriately trained in child protection (to the same level as the DSL) in order to carry out all functions necessary to ensure the ongoing safety and protection of all pupils. Such training must include regular updates (every two years) in local procedures from external safeguarding partners;
- to maintain an effective working knowledge of the Safeguarding (Child Protection) Policy and of Keeping Children Safe in Education, including any updates;
- to act on all suspicions/concerns and / or evidence of the need for children to receive additional support, or of children who have suffered or who are at risk of suffering harm;
- to monitor the Safeguarding Inbox as required by the Designated Safeguarding Lead and to act upon any child protection concerns that arise, or to refer these directly and without undue delay to the Designated Safeguarding Lead (or the Head Master where appropriate);
- to attend internal safeguarding training and from time to time deliver safeguarding training to members of the College community;
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding;
- to understand the local authority referral procedures for child protection and to decide when to make a referral by liaising with relevant agencies; to oversee and deal with any child protection concerns as requested by the Designated Safeguarding Lead;
- to oversee and deal with any child protection concerns as requested by the Designated Safeguarding Lead;
- to keep the Designated Safeguarding Lead apprised of all safeguarding concerns currently being monitored by the Deputy Designated Safeguarding Lead;
- to participate in regular safeguarding meetings with the Designated Safeguarding Lead and other Deputy Designated Safeguarding Leads, sharing information as appropriate;
- to keep accurate, detailed and confidential records of all concerns, ensuring that all such records are stored securely and are kept separate from the pupils' general files;
- to update CPOMS correctly and in a timely fashion;
- in the absence of the Designated Safeguarding Lead, to contribute to inter-agency working with external bodies in line with Working Together to Safeguard Children.

The DSL and the DDSLs have the appropriate authority and shall be given the necessary time, funding, training, resources, and support to carry out their role.

7.3 The Head Master

The Head Master will:

- Ensure that the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the DSL and Deputy DSLs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. (Reporting wrongdoing by staff in the workplace, whether or

not it involves the safeguarding and welfare of children, is dealt with in accordance with the College's Whistleblowing procedures);

- Provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith;
- Ensure that children's safety and welfare are addressed through the curriculum; and
- Be able to understand safer recruitment procedures and processes and deal with concerns raised or allegations made against members of staff and others in line with this policy and KCSIE.

7.4 The College's Governing Body

The College's Governing body will ensure that:

- There is an effective and statutorily compliant safeguarding and child protection policy and procedures in place, together with a Staff Code of Conduct and that these are provided with other required documentation to all staff (including temporary staff and volunteers) on induction;
- Committed staff are appointed to the Safeguarding team and that they have the appropriate authority and the time, funding, training, resources and support to fulfil the role and responsibilities as outlined above;
- In line with KCSIE and Working Together to Safeguard Children, a member of the Governing Body and a reserve are nominated by the full Governing Body to take leadership responsibility for safeguarding arrangements, i.e.:
 - o have oversight of safeguarding matters;
 - o be available to liaise with the local authority and / or partner agencies on issues of child protection; and
 - o instigate the annual review of this policy.
- The safeguarding team will be scrutinised by both the Safeguarding and Pastoral Governors Committee as well as reporting to the full Governing board.

The nominated safeguarding governor will fulfil their responsibilities guided by Working Together to Safeguard children, KCSIE and guidance set out by the Charity Commission.

7.5 Training of Staff

The DSL, and DDSs shall ensure that:

- All governors receive appropriate safeguarding and child protection training at induction, to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding;
- Training for governors is regularly updated;
- All staff have received the required initial and annual safeguarding training (the content of which will be in line with local procedures) and have signed to indicate that they have read and understood this Safeguarding Policy, the Behaviour Policy, the Staff Code of Conduct and Part One and Annex B of KCSIE and that they know who the DSL is;
- All staff receive training to enable them to fulfil their responsibilities listed above, including online safety (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), having an understanding of Early Help, the importance of sharing information, how to manage a report

of child-on-child sexual violence and sexual harassment (in accordance with Part 5 of KCSIE), making a referral themselves and finding guidance on how to do this, as well as the role they might be expected to play in any assessment of a child's support needs;

- All staff know what to do if a child tells them they are being abused/neglected/exploited, including maintaining an appropriate level of confidentiality and only involving those who need to be involved;
- All staff understand the difference between a 'child in need' and a 'child at risk';
- All staff receive Prevent awareness training as part of safeguarding training; the DSL and Deputy DSLs complete additional training;
- All staff are re-trained as and when required and an accurate record of staff attendance of induction and refresher training is maintained;
- All staff complete a Safeguarding Questionnaire at least annually to demonstrate understanding of the core components of KCSIE and the School's Safeguarding Policy;
- Staff are given the chance to provide feedback or ideas relating to safeguarding at the College;
- All staff receive safeguarding and child protection updates (for example via email and staff meetings) as required, and at least annually.

7.6 Record Keeping

The DSL will oversee CPOMS, the College's software for recording all information relating to child protection, as well as pastoral and learning support information. This includes ensuring staff feel confident to raise a concern and that appropriate staff are able to update incidents, noting concerns, decisions made and the rationale for those decisions. Staff are trained in good practice for record-keeping, so that records include:

- a clear and comprehensive summary of the incident or concern;
- details of how the incident was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

The DSL and DDSs will work with HMMs to ensure recording is timely, the voice of the child is consistently heard, and actions are timely, achievable and completed.

7.7 Pupil Welfare Risk Assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified. The assessment and action will be recorded and regularly monitored and reviewed.

The format of risk assessment may vary and may be included as part of the College's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the College's approach to promoting pupil welfare will be systematic and pupil focused. The information obtained through this process and the action agreed will be shared, as appropriate, with other staff, parents and third parties in order to safeguard and promote the welfare of a particular pupil or of pupils generally.

Welfare risk assessments should be recorded on CPOMS and made accessible to all relevant staff integral to the safety and welfare of that pupil.

Confidentiality and sharing information

The College's approach is based on Government guidance on information sharing, which is a helpful resource for all staff: [Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers](#)

When making decisions on what information to share and when, the most important consideration is whether information sharing is likely to safeguard and protect the child. Staff must consider if the information shared is necessary for the purpose for which it is being shared, ensure it is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Whilst the College understands the specific responsibilities arising from the Data Protection Act 2018 and UK GDPR to process personal information fairly and lawfully, staff must be clear that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about information sharing cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Staff must not promise confidentiality to a pupil and will always act in the best interests of the pupil.

Staff should only discuss concerns with the DSL, a Deputy DSL, the Head Master, the Chair of Governors, or the nominated safeguarding governor (depending on the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The College will co-operate with police and Children's Services to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children.

Where allegations have been made against staff, the College will consult with the LADO and, where appropriate, the police and Children's Services to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

All written information will be stored in a locked facility and any electronic information will be kept in a password-protected area.

7.8 Safer Recruitment

The College is committed to safer recruitment and the HR department is responsible for implementing these practices.

The College carries out the required checks on staff as outlined in Part 3 of KCSIE

Detailed information about safer recruitment and practice can be found in the Recruitment Policy.

7.9 Photography and images

The use of photographic images of pupils in publications and on the College website is covered under the Information Security Policy and the School's Privacy Notices.

Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Staff Code of Conduct.

From time-to-time professional photographers are invited into the College to take group photographs or pictures of significant events. Any professional photographers hired will be subject to appropriate vetting checks.

If the behaviour of an adult capturing images seems unusual or a pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible and in as much detail as possible to allow the concern to be followed up. The police will be informed in cases of serious concern.

7.10 Intimate Care

All staff at the BCPS site, when involved in helping a child following a soiling or wetting incident should inform another member of staff that they are helping a child. Respect for the child's privacy is important and staff should be aware that some children will want to remove soiled clothes themselves and others may require help. All staff have access to non-latex gloves, wet wipes and bags for dealing with soiling or wetting incidents. Clothes will be rinsed off and placed in a plastic bag ready to give to parents or carers at pick-up time. Spare clothes are available.

7.11 Use of College Premises by Third Parties

It is a requirement of KCSIE that, where the College's facilities or premises are made available to other organisations or individuals, the College ensures that appropriate arrangements are in place to keep children safe. This includes:

- Seeking assurance that the organisation has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed).
- Ensuring that there are arrangements in place to liaise with the College on these matters where appropriate.
- Ensuring that the College's safeguarding requirements are included in any agreement with the third party as a condition of use and occupation of the premises.
- Ensuring that failure to comply with these safeguarding requirements may lead to termination of the agreement.

These requirements apply regardless of whether or not the children who attend any of these services are pupils of the College.

The person responsible for ensuring that the College complies with the requirements set out above is Kathryn Leng, Commercial Manager of Brighton College Services. In relation to the assessment of an organisation's safeguarding and child protection policies and procedures, she will:

- Inspect the organisation's policies and procedures.
- Use a pro forma checklist to assess the extent to which the organisation's policies and procedures include the recommended content.
- Consult with the Designated Safeguarding Lead in cases of uncertainty.

No organisation will be permitted to use the College's premises or facilities until these requirements have been met.

7.12 Use of 'Reasonable Force'

The Use of Reasonable Force Policy outlines the 'use of reasonable force' and when it may be appropriate for staff to use reasonable force to safeguard children and young people. The term

covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. The DfE makes it clear that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils. KCSIE stresses that professional judgement should be used and action always depends on individual circumstances. The Deputy Head (Pupils) keeps a log of any incidents of reasonable force.

7.13 Health & Safety, Extended School Activities and Educational Visits

The School's Health & Safety Policy and Educational Visits Policies are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the College environment and away from the site when undertaking trips and visits.

Where extended activities are provided by and managed by the College, its own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on its site the member of the College staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures, to keep children safe.

When our children attend off-site activities, including those abroad on College trips, the Educational Visits Coordinator will check that effective child protection arrangements are in place. All staff are bound by the Educational Visits Policies when arranging and organising off-site trips. In particular, those responsible for organising exchange visits where pupils are accommodated by host families are required to consider what intelligence/information will best inform an assessment of the suitability of the adults in those families who will be responsible for the pupils during the stay. Where there is a safeguarding concern in relation to a specific child or venue, the trip leader should discuss this with the DSL.

7.14 Host Families

Where the College's pupils stay with host families in the UK or abroad (in the case of sports tours, for example), the College liaises with the hosting school to ensure appropriate suitability checks are completed and to secure full details. See the Educational Trips Policy, in which the Trips Checklist includes a requirement for the Designated Safeguarding Lead to check pupil lists for any safeguarding concerns.

KCSIE clarifies in Annex D that in circumstances where a school arranges for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults will be engaging in regulated activity for the period of the stay. In such cases and where the school has the power to terminate such a homestay the school would be the regulated activity provider. Where the child's parent(s) or a pupil themselves arranges their own homestay, this would be a private arrangement, therefore, the school would not be the regulated activity provider.

7.15 Secure premises

The College will take all practicable steps to ensure that the premises are as secure as circumstances permit.

The College keeps a Visitors' Log at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on College premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the premises. Visitors must sign a Child Protection declaration at

Reception when receiving their badge; this includes the Child Protection contact details on the back for ease and speed of communication. The Security team is vigilant in stopping all visitors who are not known to them. The College manages large events (such as parents' evenings or concerts) differently, locking down areas of the site and allowing guests access only to the appropriate venue(s). Senior pupils sometimes take visitors/families for a tour of the College. They have received safeguarding training, must follow a set route which remains in the main public areas of the College, and they are briefed on what to do if anything concerns them during the tour. Pupils at BCPS are never on their own with visitors if providing a tour but are accompanied by a teacher.

In addition to the procedures above, all visitors to Boarding Houses must report to the duty member of staff immediately on arrival and must observe the necessity to be kept under sufficient staff supervision during their visit.

7.16 Monitoring and review

This policy is reviewed at least annually. The policy may also be reviewed following changes in government guidance and legislation and following a serious incident as part of the 'lessons learned' process.

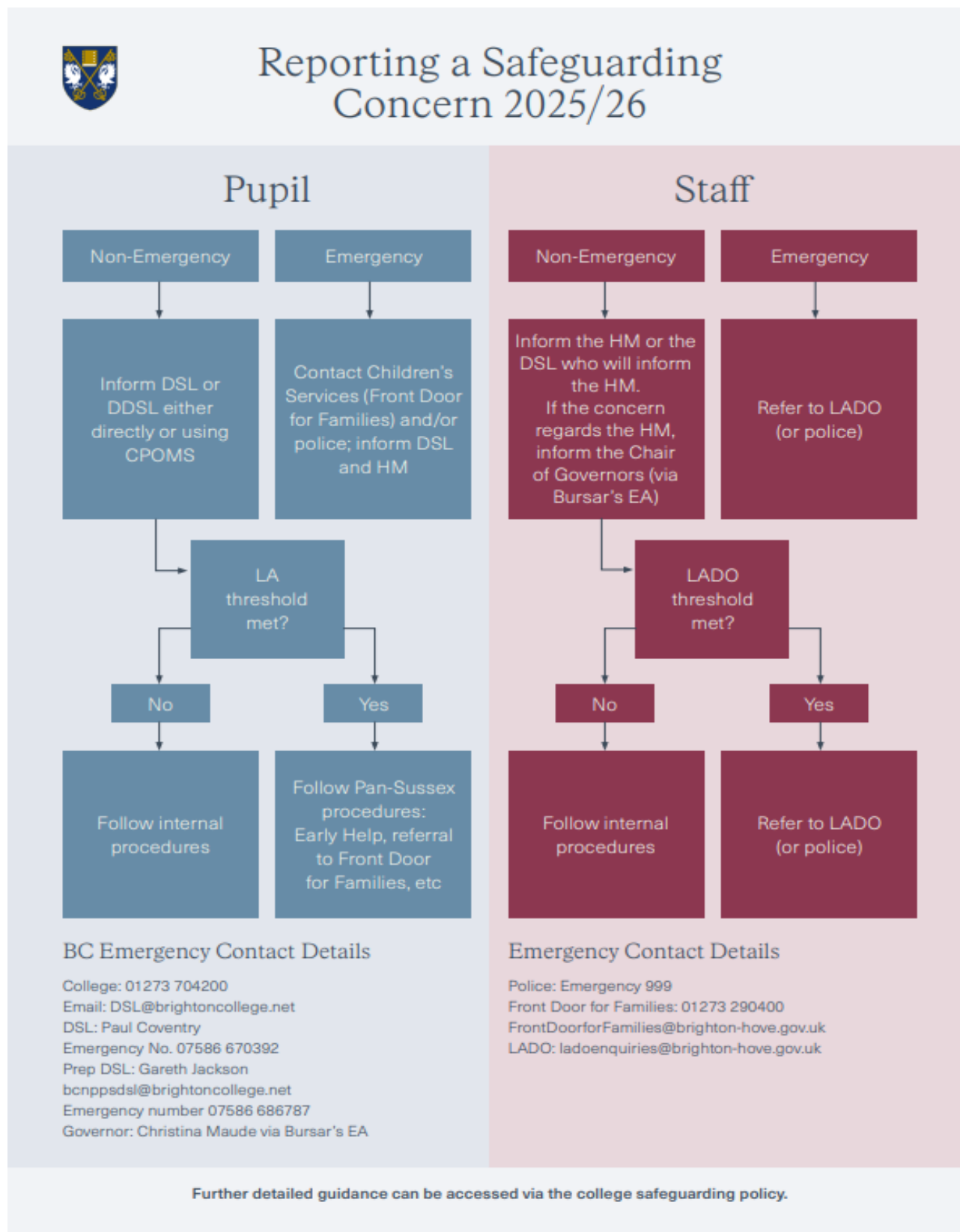
Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

The local authority provides an annual Safeguarding Audit, which offers a significant extra layer of self-reflection and scrutiny to the College's Policy and associated procedures.

As part of the review process, the DSL communicates with the Local Authority Schools' Safeguarding Officer to discuss best practice and local authority procedures.

8. Appendices

8.1. Reporting a safeguarding concern flowchart



8.2 Recognising Indicators of Abuse

As part of training, staff are also provided with the following guidance for recognising the indicators of abuse:

Physical abuse

Physical indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument on an infant in various stages of healing that are seen after absences, weekends, or vacations.
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing "stocking" or "glove" marks on hands and feet; "doughnut shaped" on buttocks or genital area.
- Rope burns.
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

Emotional Abuse

Physical Indicators:

- Eating disorders, including obesity or anorexia.
- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height level substantially below norm.
- Flat or bald spots on head (infants).
- Nervous disorders (rashes, hives, facial tics, stomach aches).

Behavioural Indicators:

- Habit disorders (biting, rocking, head-banging).
- Cruel behaviour, seeming to get pleasure from hurting children, adults or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behavioural extremes, such as overly compliant-demanding; withdrawn-aggressive; listless-excitabile.

Sexual Abuse

Physical Indicators:

- Torn, stained or bloody underclothes.
- Frequent, unexplained sore throats, yeast or urinary infections.
- Somatic complaints, including pain and irritation of the genitals.
- Sexually transmitted diseases.
- Bruises or bleeding from external genitalia, vagina or anal region.
- Pregnancy.

Behavioural Indicators:

- The victim's disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).
- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing, or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Neglect

Physical Indicators:

- Poor hygiene, including lice, scabies, severe or untreated diaper rash, bedsores, body odour.
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.
- Lack of immunisations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance.
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Begging for or collecting leftovers.
- Assuming adult responsibilities.
- Reporting no caretaker at home.

Child Sexual Exploitation

Physical indicators:

- Tiredness, mood swings.
- Bruising.

- Sexually transmitted diseases.
- Pregnancy.

Behavioural indicators

- Sudden decline in school performance, punctuality, attendance.
- In possession of expensive goods.
- Going to places you know they cannot afford.
- Age-inappropriate clothing.
- Inappropriate sexualised behaviour.
- Secretive.
- Mixing with older people.

Female Genital Mutilation (see also [Multi-agency statutory guidance on female genital mutilation, B1.2](#))

Physical indicators:

- Difficulty walking, sitting, standing.
- Spend longer than normal in the bathroom.
- Bladder or menstrual problems.

Behavioural indicators:

- May talk about a 'special procedure' or 'special occasion to become a woman'.
- Abroad for a prolonged period.
- Unusual absence.
- Reluctant to undergo normal medical examinations.

Radicalisation

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

We might consider the following when looking for indicators, although no single checklist can be created in the case of radicalisation:

- Disclosure: e.g. writing, drawings, poems, accessing extremist material
- Expressions of support for terrorism: 'us' and 'them' language, justifying use of violence
- Personal crisis: family tension, sense of isolation, changes in friendship group, low self-esteem, questioning identity, family, faith, belonging
- Personal circumstance: migration, local community tension, a sense of grievance triggered by a personal experience e.g. of racism, discrimination

No list of abuse or neglect indicators can include all signs, and staff are advised to use their best judgement.

Failure to adhere to the contents of this policy will lead to disciplinary procedures being followed.