Safeguarding Policy

Twyford is a School:

- Where we promote an enduring love of learning.
- Where each child is respected as an individual.
- Where we engender a clear appreciation of the traditional ethical and spiritual precepts of our Christian foundation.
- Where children feel safe and unconditionally valued.
- Where excellence is identified and where each child may extend themselves.
- Where staff are our most cherished resource.
- Where pupils engage with technology as a means of extending systematic enquiry.
- Where there is a partnership between staff, pupils, parents and governors.

Re-Written Updated By:	Tom Parsons/Judith Ramshaw Tom Parsons/Judith Ramshaw EYFS wearable technology updates Tom Parsons Judith Ramshaw, Kealey Taylor EYFS updates KCSiE 2026 Judith Ramshaw /Tom Parsons AI related review Crime and Policing Act 2025 Judith Ramshaw / WTTSC 2026, KCSIE 2026 ISS regulations, EYFS Statutory Framework 2026, Restrictive Physical Intervention / Positive Handling Guidance (2026),	Summer 2023 July 2025 May/June/Aug 2025 March 2026 July 2026 September 2026
Reviewed By:	Aurélien Vieilleville (Safeguarding Governor) SLT A&PC	Sept 2025, 2026 September 2025, 2026 24.09.26
Approved By:	Full Governing Board	3/12/2026

DONR: September 2027

Abbreviations, Acronyms and Definitions

Abbreviation / Acronym	Definition
EYFS	Early Years Foundation Stage
KCSIE	Keeping Children Safe in Education
WTTSC	Working Together to Safeguard Children 2026
DSL	Designated Safeguarding Lead
YPSI	Youth Produced Sexual Imagery

This Policy is for the whole School, Early Years Foundation Stage and Boarding

Procedures and guidance
This policy has been updated to show changes from KCSIE 2024 to KCSIE 2026, Working Together to Safeguard Children 2026, Working together to improve school attendance 2024, Meeting Digital and Technology Standards in Schools and Colleges, ISS regulations and follow the inspecting safeguarding guidance.

In relation to pupils in the Early Years Foundation Stage, this policy is implemented in accordance with the Statutory Framework for the Early Years Foundation Stage (DfE, 2026**)**.

The School ensures that safeguarding and welfare requirements are met, including staff suitability and training, supervision, child protection procedures, use of technology, intimate care arrangements, health and safety, and information sharing, in line with statutory EYFS expectations.

It reaffirms the intent of Twyford School to do everything in our power to ensure all the children in our care are protected from harm. It sets out the responsibilities of different people in School but makes clear our philosophy that every adult is responsible for ensuring our children and young people are safeguarded to the highest standards possible. Children include everyone under the age of 18.

As part of the review process, we ensure that those who are working with our children have a say in the development of safeguarding. If more, or less, information is required, or there are further Government updates, it is the responsibility of Twyford School to make any required amendments.

The policy should be read in conjunction with the Safer Recruitment Policy, The Low Level Concerns Policy, The Whistleblowing Policy; AI Policy; Lettings and Hirings Policy; The Contractors Policy; The Recruitment, Selection and Disclosure Policy; The Staff Induction Policy, The Pupil Behaviour, Discipline, Sanctions and Exclusion Policy, as well as the Staff Handbook and Staff Code of Conduct.

This Policy is for the whole School, including Early Years Foundation Stage and Pupils boarding at Orchard Close. It is to be adhered to by anyone letting Twyford School facilities.

This policy will be reviewed at least annually and approved by the Governing Body in the Summer or early in the Autumn term.

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Any links to local or national advice and guidance can be accessed via the safeguarding in education webpages: www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance

Links to online specific advice and guidance can be found at https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/onlinesafety

Links to other pages from the local authority on safeguarding can be found at https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren

The procedures of the Hampshire Safeguarding Children Partnership can be accessed at http://hipsprocedures.org.uk/page/contents

Statutory Guidance:

This policy has been developed with regard to the following statutory guidance and legislation (as applicable for the 2025–26 academic year):
Relevant safeguarding legislation including the Children Acts 1989 and 2004
Children Act 2004 & 1989
Education (Independent School Standards) Regulations (as amended)
Restrictive physical intervention guidance 2026/positive handling guidance (2026)
EYFS framework 2026
Crime and Policing Act 2025, implemented 2026 and subsequent Home Office guidance, including provisions relating to Child Criminal Exploitation, knife crime, child sexual abuse offences and violence reduction

Working Together to Safeguard Children(HM Government 2026 (2023)
Keeping Children Safe in Education (DfE2026) The School monitors emerging statutory guidance, including the proposed updates to Keeping Children Safe in Education, and will update this policy promptly once finalised.

As an employer we comply with the Childcare (Disqualification) regulations 2009 Disqualification under the Childcare Act 2006 (2015)
FGM Act 2003 Mandatory Reporting Guidance (2016)

Prevent Duty Guidance: Part 5 of Counter-Terrorism and Security Act 2015
(http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted)

Who to Contact

The Designated Safeguarding Lead for the school is: Mr Tom Parsons (Assistant Headteacher).

Aurélien Vieilleville is the designated governor for safeguarding.

The Deputy Designated Safeguarding Leads are:

- Mrs Sharni Baliant
- Miss Pippa Higham
- Mr Adam Cleaver (Head of Boarding)
- Mrs Kealey Taylor (Head of Pre-Prep)
- Miss Claire Smith
- Mrs Laura Marks (Head of Early Years)

Mrs Laura Marks is also the lead practitioner for safeguarding in the Early Years.

To contact a member of the safeguarding Team call 01962 672285 and use access code 2580.

In the event of partial or full closure, including circumstances due to critical incidences, arrangements will be made to ensure there is effective DSL cover at all times. with a nominated lead if the DSL were not available.

1. Policy Statement

Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life. As a school we are committed to safeguarding and promoting the welfare of all our pupils. The purpose of this policy is to provide the framework staff need in order to keep children safe and secure. It includes:
The actions that we take to provide help and support as soon as problems emerge:
To prevent harm
To protect children from maltreatment whether that is within or outside the home, including online
To promote wellbeing
To create safe environments
To educate on rights, respect and responsibilities
To respond to specific issues and vulnerabilities
As such, this overarching policy will link to other school policies.
We maintain an attitude of “it could happen here” where safeguarding is concerned.
It ensures that effective arrangements are in place to safeguard and promote the welfare of pupils, including through clear child protection procedures, early help, information sharing, multi-agency working, safer recruitment, staff training, record keeping, site safety, boarding arrangements, and oversight by the Proprietor and Governing Body.

2. Aims, Principles and Values

Aims:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities
- To ensure consistent good practice across the school
- To demonstrate our commitment to protecting children.

Principles and values:

Children have a right to feel secure and cannot learn effectively unless they do so. All children have a right to be protected from harm, regardless of age gender, including trans gender, race disability, sexuality, religion and non-religion, or language.

All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account *contextual safeguarding*, in accordance with the guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.

While the School will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the Police, without notifying parents if this is believed to be in the child's best interests.

As a School we educate and encourage pupils to recognise when they are at risk and how to keep safe through:

- Teaching safeguarding through carefully selecting the content of the curriculum, in particular relevant topics within RSHE, online safety taught in ICT lessons and reinforced in tutor time, and exploration at other relevant opportunities that arise. The curriculum will be tailored to the specific needs and vulnerabilities of individual children.

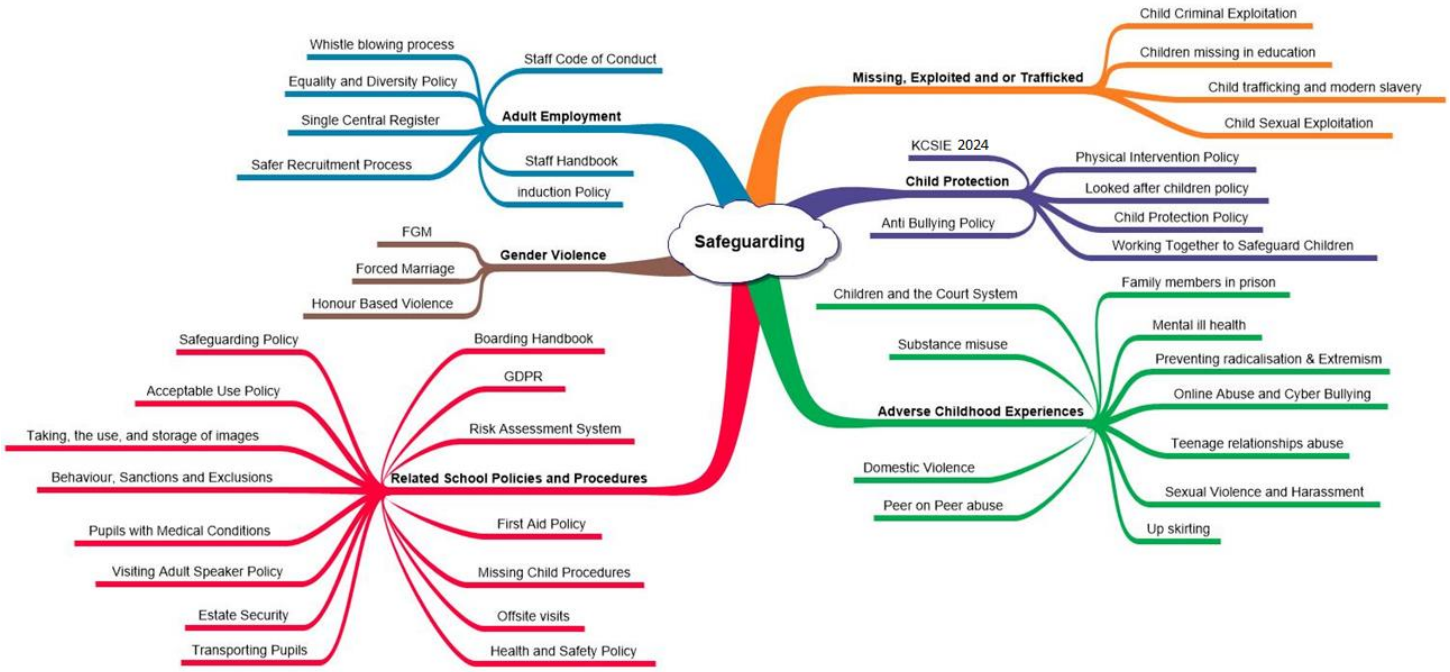
- A school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.

- The creation of a culture that helps children to feel safe and able to talk freely about their concerns, believing that they will be listened to and valued.

- Reinforcing the fundamental British Values of democracy, rule of law, individual liberty, mutual respect and tolerance of those of different faiths and beliefs.

Safeguarding is everyone's responsibility. As such it does not rest solely with the Designated Lead Safeguarding Lead (DSL) and their deputies to take a lead responsibility in all the areas covered within this policy. Safeguarding, support identifying concerns, sharing of information and taking prompt action, are procedures intended to put in place measures that minimise harm to children. Should there be situations where gaps or deficiencies are highlighted a review will be carried out in order to identify learning and inform the policy, practice and culture of the school.

3. Roles and responsibilities within Twyford School



All staff have a key role to play in identifying concerns early and in providing help for children.

To achieve this, they will:

- Place wellbeing and learning of children at the centre of their professional practice
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Treat children fairly and with respect, take their knowledge, views, opinions and feelings seriously and value diversity and individuality.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Seek to work in partnership with parents and carers, to support the young person's learning and wellbeing in and out of school.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training to be more assured of compliance and alert to the signs of harm and abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day. If the DSL is not contactable, immediately a Deputy DSL should be informed.
- Be prepared to refer directly to social care, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the HSCP and take account of guidance issued by the DfE.
- Support pupils in line with their child protection plan.
- Treat information with confidentiality but never promising to "keep a secret".
- Notify the DSL or their Deputy of any child on a child protection plan, or child in need plan, who has unexplained absence.

- Have an understanding of Early Help and be prepared to identify and support children who may benefit from early help.
- Liaise with other agencies that support pupils and provide early help.
- Ensure they know who the DSL and Deputy DSLs are and know how to contact them.
- Have an awareness of this Safeguarding Policy, the Whistle Blowing and Low- Level Concerns policies, the Pupil Behaviour Policy, the Staff Code of Conduct, procedures relating to the safeguarding response for children who go missing from education (see Twyford School Missing Child Policy) and the role of the DSL.
- Be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Understand that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or understand they are being threatened due to vulnerability, disability and/or sexual orientation or language barriers. This will not prevent staff from having a professional curiosity and speaking to the DSL if they are concerned.
- Determine how best to build trusted relationships with children and young people which facilitate communication.
- Provide an appropriate safe space and identify or act as a trusted adult to support children who identify as lesbian, gay, bi or trans (LGBT) to help reduce any additional barriers they face to speak out or share their concerns.
    - Recognise prejudice-based harm (racism, faith-based prejudice, and other discrimination) as harm in its own right which can significantly affect a child's welfare, wellbeing and sense of safety
    - Promote an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities.
- Read and comply with the relevant sections of KCSIE 2026 and receive appropriate safeguarding and child protection training in line with statutory expectations.

Senior Leadership Team responsibilities:

- Contribute to inter-agency working in line with Working Together to Safeguard Children 2026 2023 guidance
- Provide a co-ordinated offer of early help when additional needs of children are identified
- Ensure all staff receive appropriate and regular safeguarding and children protection training in line with statutory expectations
- Ensure staff are alert to the various factors that can increase the need for early help (Para 18 *KCSiE 2026*)
- Working with Children's Social Care, support their assessment and planning processes including the school's attendance at conference and core group meetings
- Carry out tasks delegated by the governing body such as training of staff, safer recruitment and maintaining a single central record
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the school
- Treat any information shared by staff or pupils with respect and follow agreed policies and procedures

- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE) and Hampshire Safeguarding Children Partnership (HSCP) procedures

Governing Body responsibilities:

- Ensure School information in the policy remains current
- Ensure the school has effective safeguarding policies and procedures including Child Protection, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Ensure HSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- Be sufficiently trained to provide strategic challenge to test the school has effective safeguarding /child protection policies and procedures to support the delivery of robust whole school approaches.
- Comply with local multi agency safeguarding arrangements and ensure HSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- Consider legal duties placed on school in relation to complying with their duties under the Human Rights act(1988) The Equality Act (2010 promoting the welfare of children, in supporting pupils with regards to particular protected characteristics-including disability, sex, sexual orientation, gender reassignment and race.
- Ensure recruitment, selection and induction follows safer recruitment practice including all appropriate checks.
- Ensure that allegations against staff, which meet the harms threshold are dealt with by the headteacher. Allegations against the Headmaster are dealt with by the Chair of Governors.
- Ensure a member of the Senior Leadership Team is appointed as Designated Safeguarding Lead (DSL) and this is recorded in their job description. The Headteacher will deal with other adult related allegations that do not meet the harms threshold.
- Ensure staff have been trained appropriately and this is updated in line with guidance
- Ensure any safeguarding deficiencies or weaknesses are remedied without delay.
- Identify a nominated governor for safeguarding is identified.
- Should ensure relevant staff have due regard to relevant data protection principles, as provided in the Data Protection Act 2018, the UK GDPR and the DfE Data Protection guidance for schools.
- In early years settings, ensure the safe use of technology, mobile phones and cameras in the setting
- Should ensure that the school meets the DfE filtering and monitoring standards has appropriate IT filtering/monitoring systems in place and regularly review their effectiveness.
- Ensures that the School continues to meet the Independent School Standards Regulations and that safeguarding arrangements are effective, compliant and kept under regular review.

Designated Safeguarding Lead Responsibilities (to be read in conjunction with DSL role description in KCSiE Annex C)- page 171

In this School the DSL is Tom Parsons
The Deputy DSLs are:

- Sharni Balint
- Pippa Higham

- Adam Cleaver
- Kealey Taylor
- Claire Smith
- Laura Marks

In addition to the role of all staff and the senior management team the DSL will have the ultimate lead responsibility for child protection and will have the duty to:

- Refer cases, in a timely manner avoiding any delay that could place the child at more risk, to the local authority social care, to the channel programme where there is a radicalisation concern, or to the police for a suspected crime.
- Ensure that School have referred to the Disclosure and Barring Service where a person is dismissed or left due to harm or risk to a child.
- Assist the Governing Body in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.
- Liaise with Headmaster to inform of the issues and any ongoing enquiries, including requirement for children to have an appropriate adult.
- Liaise with the LADO and other relevant agencies for advice/partnership working.
- Liaise with School's mental health lead, AHW, Head of Boarding, SENDCO and pastoral team.
- Understand the views of the children.
- Encourage a culture of listening to children, taking account of their wishes and feelings
- Promote an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities
- Ensure staff understand the difficulties that children may have in approaching staff about their circumstances.
- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.
- Be assured of compliance the training opportunities and briefings provided by HSCP to ensure staff are assured of compliance the latest local guidance on safeguarding.
- Ensure whole school training occurs regularly with at least annual updates so that staff and volunteers can fulfil their responsibilities knowledgeably.
- Ensure any members of staff joining the school outside of the agreed training schedule receive induction prior to commencement of their duties.
- Ensure every member of staff knows who the DSL and the Deputies are, have an awareness of the DSL role and know how to contact them.
- Act as point of contact to ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns about a child to the DSL and concerns about an adult to the Headmaster (Chair of Governors if Headmaster is subject of concern, without notifying Headmaster).
- Support teaching colleagues to make reasonable adjustments.
- Information sharing and managing the child protection file.
- Share information without consent when there is good reason to do so, and when this will enhance the safeguarding of a child in a timely manner.
- Understand relevant data protection legislation.
- Keep up to date, secure, clear, accurate and comprehensive records of child protection concerns, with details of how the concern was followed up and resolved; a note of any action taken, decisions reached and the outcome; keep securely and separately from the main pupil file and use these records to assess the likelihood of risk.
- Ensure The School works in partnership with statutory safeguarding partners in accordance with *Working Together to Safeguard Children (2026)* and local safeguarding arrangements,

ensuring that thresholds, referral pathways and professional responsibilities are clearly understood and applied.

- Ensure that safeguarding records are transferred accordingly (separate from pupil files) and in a timely fashion when a child transfers school. ie Within 5 days of a school year or in year transfer.
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. Consideration is given to a transition meeting prior to moving if the case is complex or on-going.
- Ensure that an appropriate adult is present at any search of a child.
- Develop, implement and review procedures in the school that enable the identification and reporting of all cases, or suspected cases, of abuse.
- Ensure this policy reflects the principles and expectations set out in Working Together to Safeguard Children (HM Government, 2026).
- Ensure The School is committed to safeguarding children through effective early help, timely information sharing, and multi-agency collaboration, recognising that safeguarding is a shared responsibility across education, health, social care and other relevant agencies.
- Meet any other expectations set out for DSLs in KCSiE (DfE 2026).

Safeguarding Governor: Aurélien Vieilleville

The lead governor for safeguarding will:

- Make sure the school has suitable and up-to-date policies for:
  - Safeguarding /Child protection
  - Staff code of conduct
  - Handling allegations of abuse against staff and volunteers, including allegations that do not meet the harm threshold (low-level concerns)
- Monitor the school's safeguarding systems and procedures.
- Make sure the school has an appropriate safeguarding response to children who are absent from education
- Make sure the school has appropriate online filters and monitoring systems in place
- Make sure the school has appointed a designated safeguarding lead (DSL) from the senior leadership team (SLT), with the appropriate status and authority to carry out their duties
- Meet regularly with the DSL to monitor whether the school's policies and procedures are effective, and all staff and governors have had the appropriate level of training (as applicable)
- Make sure the DSL has the additional time, funding, training, resources and support needed to carry out the role effectively
- Make sure the school has appointed a designated teacher to promote the educational achievement of looked-after and previously looked-after children, and that this person has appropriate training
- Make sure the curriculum covers safeguarding, including online safety, which should be a running and interrelated theme in your whole school approach to safeguarding and related policies/procedures
- Make sure that checks to the single central record (SCR) are happening.
- Keep the LGB up to date with statutory guidance relating to safeguarding and child protection, and any advice issued locally by the school's safeguarding partners
- Inform the Governing body as to whether it needs to make any changes (e.g. in light of new regulations)

- Make sure all governors and trustees receive safeguarding and child protection (including online) training at induction, which is regularly updated
- Deal with specific safeguarding incidents, but they will be notified by school leaders when they happen (in general terms).

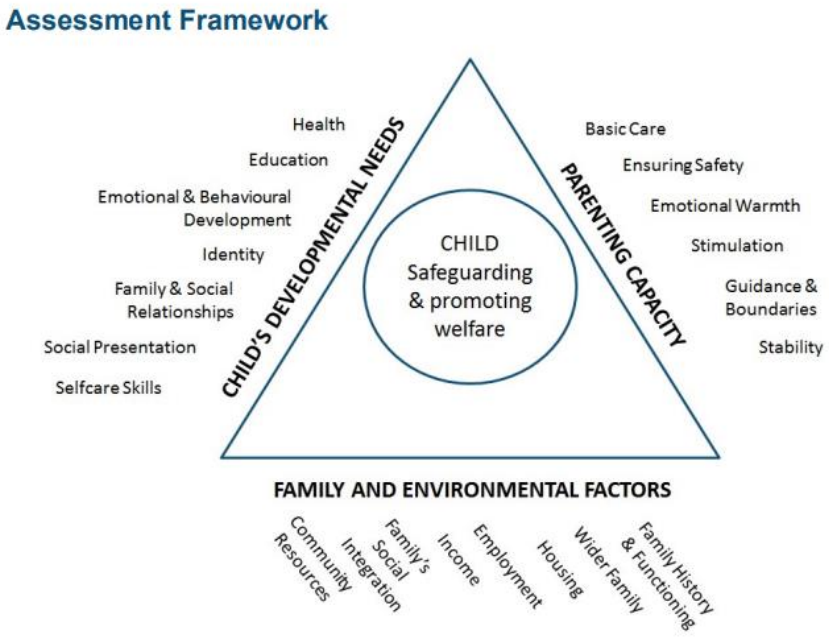
4. Child Centred Approach

All pupils in our school are encouraged to talk to any member of staff about situations or to share concerns which are causing them worries. The staff will listen to the pupil, take their worries seriously and share the information with the safeguarding lead.

Staff should be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected. They may not recognise their experiences are being harmful. Staff have duty to consistently demonstrate professional curiosity; trust their instincts, remember children will protect their parents and don't assume 'reported' levels of other professional involvement. Staff must consider how to build trusted relationships which facilitate communication.

The Data Protection Act 2018 and the UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

In addition, we provide pupils with information of who they can talk to outside of school both within the community and with local or national organisations who can provide support or help. See diagram below from Working Together to Safeguard Children 2026 2018 document.



As a school, we review this Safeguarding policy at least annually in line with DfE, HSCP, HCC and any other relevant guidance. The Governing Body, as Proprietors, will usually undertake an annual review in its June Full Governing Body meeting of the School's Safeguarding Policy and procedures, and of the efficiency with which the related duties have been discharged. This discussion will be formally documented in the Minutes of the Full Governing Body Meeting. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. The discussion is led by the Safeguarding Governor, Mr James Fox.

The School complete the Hampshire Safeguarding Children Partnership Annual Audit, and present this to Governors. We also use the Prevent Audit tool to aid School self-evaluation and review against the Digital and Technology Standards

Groups bringing children to use, or during the letting of Twyford School's facilities have a legal and moral duty to safeguard and promote the welfare of all children.

We require hirers to adhere to the standards stated by the Department of Education "Boarding Schools: National Minimum Standards" (September, 2022) and to Annex E of KCSIE 2022 regarding Statutory Guidance for regulated activity.

5. Definitions within this document:

'***Safeguarding'*** is defined in the Children Act 2004 as protecting from maltreatment; preventing impairment of health and development; ensuring that children grow up with the provision of safe and effective care; and work in a way that gives the best life chances and transition to adult hood. Our safeguarding practice applies to every child.

Child protection is an aspect of safeguarding that is focused on activity undertaken to protect children who have been significantly harmed or are at risk of significant harm.

The term ***Staff*** applies to **all** those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes parent volunteers and Governors.

Child refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments.

Adolescent refers to a young person aged 10-18 years of age.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, step- parents and foster carers.

Harm is defined as ill treatment, impairment of health, or impairment of physical, emotional, intellectual, social or behavioural development. It includes witnessing others being harmed as in all forms of domestic abuse.

Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care.

Victim is used within the policy, but we recognise not everyone who has been subjected to abuse considers themselves to be a victim or want to be described in this way. Staff should be prepared to use any term with which the individual child is comfortable.

Perpetrator *or* ***Alleged Perpetrator*** are terms used in places. Staff should be mindful when using these terms, especially in front of children as it is possible the abusive behaviour may have been harmful to the perpetrator as well.

Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse which occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity.

Extremism- the vocal or active opposition of the fundamental British values, including democracy, rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism- an action that endangers or causes serious violence to a person/people; which causes serious damage to property; or seriously interferes or disrupts an electronic system. A threat is used /designed to influence the Government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

6. Child protection process - Twyford School Child protection procedures

The following procedures must be adhered to by all staff working in the school and will be covered by training, to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or is at risk of harm. **In all cases, if staff are unsure, they should always speak directly to the Designated Safeguarding Lead or deputy DSL.**

The prime focus at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children with those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff considers a child is at risk of abuse or exploitation, or suspects harm, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information

2. Report it to the DSL immediately. Face to face is best but to contact a member of the safeguarding team call 01962 672285 with code 2580. Do not record on CPOMS first

3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available

4. Make an accurate record CPOMS or Pink form as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
    - Dates and times of their observations
    - Dates and times of any discussions in which they were involved
    - Any injuries
    - Explanations given by the child / adult
    - Any actual words or phrases used by the child

- List what action was taken

The records must be signed and dated by the author, or equivalent on CPOMs (electronic based records) These may be used in any subsequent court proceedings.

In the absence of the DSL or their Deputies, and the Headmaster a member of staff must be prepared to refer directly to Children's Social Care (and the police if appropriate) if there is the potential for immediate significant harm.

All staff should:

A member of staff who is approached by a child should listen positively and try to reassure them. They should always ensure that the child feels that he/she is being taken seriously and must not under any circumstances give the child the impression that he/she is causing a problem. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

7. Guiding principles, the seven Rs

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure e.g. you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible

- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

Report

- Share concerns with the DSL as soon as possible
- If you are not able to contact your DSL or the Deputy, and the child is at risk of immediate harm, contact the children's services department directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

Record

- If possible make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

Remember

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it

Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following the report being made. If they do not receive this information they should be proactive in seeking it out.

If a staff member believes that their concerns have not been referred on or, that the child remains at risk, they should initially ask the DSL to reconsider ensuring that the risks area understood. If this does not result in a satisfactory outcome, or the DSL rationale appears to miss the risk to the child, then the Whistleblowing procedures of the school should be followed. If the DSL is unhappy with the response from Children's Social Care, they should consider following the HSCP escalation protocol.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

Following a report of concerns the DSL must:

Decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to Children's Social Care, to Channel or the police if it is appropriate. The rational for this decision should be recorded by the DSL.

Normally the school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account.

If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care via the Inter-Agency Referral Form (IARF) making a clear statement of:

- the known facts
- any suspicions or allegations
- whether or not there has been any contact with the child's family

If there is indication that the child is suffering significant harm, a call will also be made to Children's Reception Team (CRT) on 01329 225379 or Hampshire Children's Services on 0300 555 1384

If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL must then notify Children's Social Care of the occurrence and what action has been taken

When a pupil needs *urgent* medical attention and there is suspicion of parental abuse causing the medical need, the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, while Children's Social Care are informed. Advice should be sought from Children's Social Care about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the Early Help process

Guidance documentation

Documentation to support child protection processes is included on the following pages.
It includes external and internal flow charts of procedures to follow; concerns form for use if no CPOMs access (located next to photocopiers and in common rooms) and skin maps.

- Guidance Flowchart for child protection procedures

DSL – Designated Safeguarding Lead
MASH – Multi Agency Safeguarding Hub
CRT – Children's Reception Team
CP – Child protection

STAFF

DSL

Child

Consistent explanation or minor accident

Physical injury, neglect or emotional abuse

Disclosure or allegation of sexual abuse

Allegation against adult who works with children

Keep accurate records and any original

Serious incident or recurrent episodes or inconsistent

Give reassurance, avoid leading questions and do not promise confidentiality

Record the date, time, observations, what was said and who was present. Use a skin map to record visible injuries. NB. This is recorded by the first person the child speaks to as soon as possible after the event and within 24 hours after the event

In an emergency call for

Refer to the DSL as soon as practical on the same day.

If the DSL isn't available, then contact one of the Deputy DSLs

Inform the Headmaster, unless allegation is against the headmaster, when the Chair of Governors (CoG) is informed (without

The DSL will make a judgement about the situation and either:-

Work with the family through the early help process

Make a referral to children's social care using the inter-agency referral form. If the child is considered to be at risk of harm DSL will also call 01329 225379. In cases of immediate danger the police will be called.

Monitor the situation

All allegations go to the LADO on 01962 876364 or via Hampshire LADO Enquiry Form sent to LADO@hants.gov.uk. If the CoG is not available, for Headmaster allegations, the LADO should be informed directly the same day.

- DSL to inform those that need to know in the school including the Headmaster
- Prepare a confidential file and keep accurate records on CPoms
- Receive feedback from MASH and work with the

CRT will refer to MASH if it is felt to be CP. MASH will make the judgement and communicate with the school

* In the cases of known FGM, the teacher who was made aware will also make contact with the police

Twyford School internal procedure for raising safeguarding concerns about a child

Observation or disclosure made to a member of staff

Issue to be referred to the DSL or a Deputy in person. Following discussion with the DSL issue should be recorded on CPOMS. If CPOMS not available, complete a pink concerns referral form, found in the staff room. If possible, speak in person immediately to the DSL or a Deputy DSL. All paper notes/records taken to be passed to the DSL.

TWYFORD SCHOOL- PINK CONCERNS FORM IF NO CPOMS ACCESS

SAFEGUARDING	OTHER CONCERN

Referral for: Child's Name:	Date: Time: Child's D.O.B. Year Group: Class: Name of adult raising concern: Role of adult: SLT/Teacher/Learning Support/Lunchtime/ Estate/Admin / GAP/ Volunteer
Nature of concern/including any record of what the child said to referring adult: (Continue on separate sheet if necessary	
Date & time note of this concern was given to School's Safeguarding Lead: C Poms check: P.T.O.	

Action Taken by Designated Safeguarding Lead:
□ Spoken to adult who recorded concern.

□ No action

Next steps internal:

Or
Next steps external:

Contact: Parents □ Police □ Children's Services □ MASH □ LCSP □ LADO □

Child Protection □ Attendance □ Inclusion Service □ Other agency □

Notes from contact with further agency following a concerns form

When:

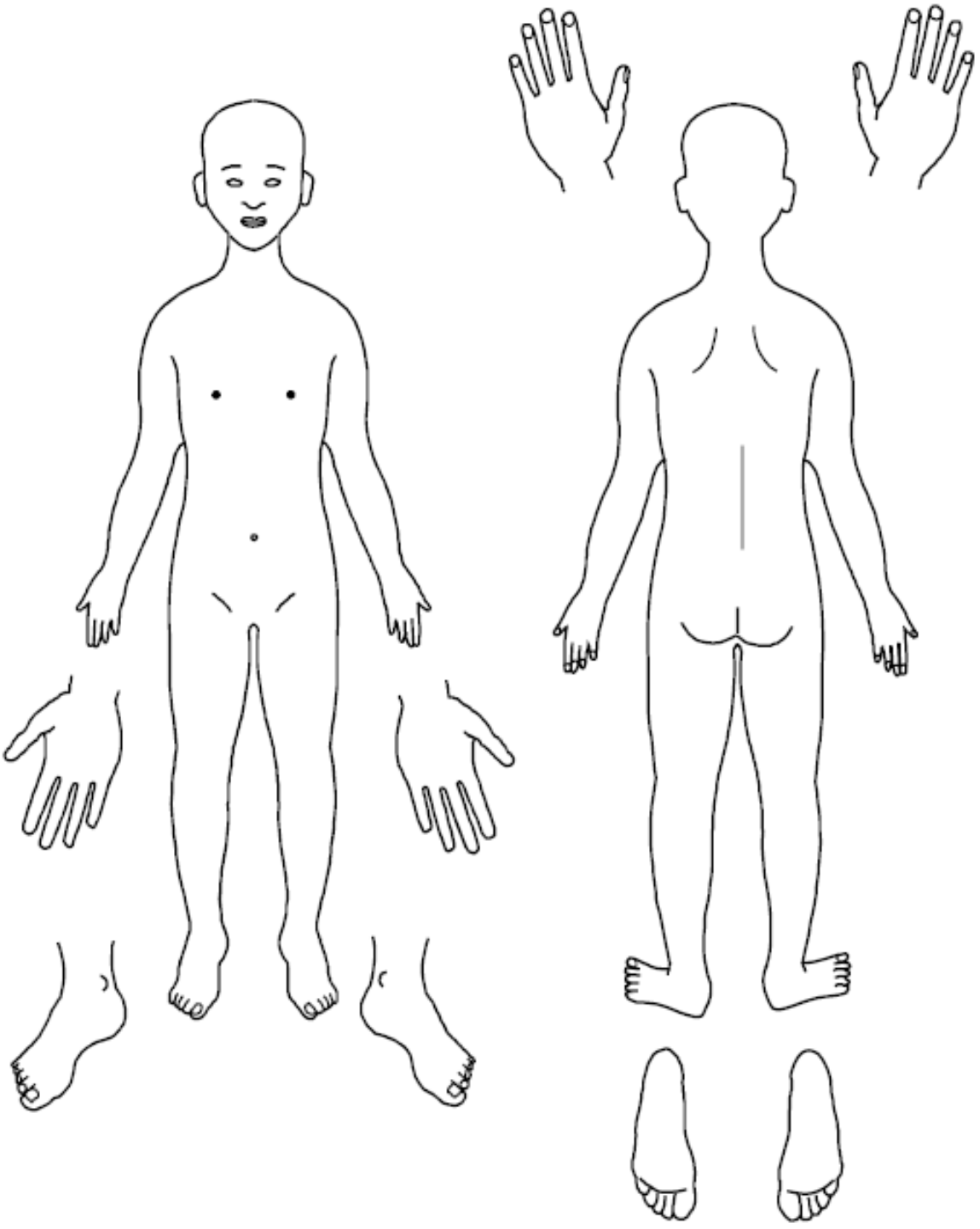
Who to:

Further action required? Yes/No
Who to tell?

CPoms log made? Yes/No

Copied to:

8. Training



All staff in our school are expected to be assured of compliance the signs and symptoms of abuse, consider whether children are at risk of abuse or exploitation, within or outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms and staff must be able to respond appropriately. It is equally important to understand intra familial harms and any support needed for siblings following incidents.

Safeguarding training is provided termly in the form of an update to staff from the DSL/Deputy DSLs at Inset, and The Safeguarding Team receive full safeguarding training every three years. Separate training is provided to all new staff on appointment, either at Inset, or before the staff member has contact with children (dependent on start date). A weekly email with a safeguarding question for consideration is sent to all staff to check their understanding of the various safeguarding issues.

Safeguarding training for staff working within the EYFS will meet the criteria set out in Annex C of the current EYFS Statutory Framework (2026). Training will be renewed at least every two years, with safeguarding updates provided between formal training sessions.

The DSL and Deputy DSLs will attend training at least every other year to enable them to fulfil their role, as well as taking professional continuous opportunities to extend their knowledge and share best practice (via meetings with other DSLs, meeting LADOs, attendance at courses/conferences and reading online material). The DSL shares initiatives and forthcoming developments that he is involved in for this purpose.

Any update in national or local guidance will be shared with all staff in briefings and then captured in the next whole school training, or sooner if urgent. This policy will be updated during the year to reflect any changes brought about by new guidance.

9. Referral

When a child is suffering, or is likely to suffer from harm, it is important that a referral is made to local authority children's social care (and if appropriate the Police) immediately. A referral will follow the Local Authority referral process. Generally, the DSL will inform the parents prior to making a referral. However, there are situations where this may not be possible or appropriate, particularly when informing parents/carers may place the child at further risk.

Following any concerns raised, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached, or if it is not clear if the threshold is met, then the DSL will contact Children's Social Care and, if appropriate, the Police. If the DSL/Deputy DSL is not available or there are immediate concerns, the staff member will refer directly to Children's Social Care and the police, if appropriate. We will use guidance from the National Police Chief's Council (NPCC) to determine when to contact the police.

N.B. The exception to this referral process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the Police. The DSL should also be made aware.
Staff are made assured of compliance the requirement for all children to have an Appropriate Adult with them for interviews during any child protection enquiries.

A CERAF (Child Exploitation Risk Assessment Framework) should be completed as soon as potential concerns regarding any form of child exploitation are identified. This may include child sexual exploitation (CSE), child criminal exploitation (CCE), county lines (CL), modern day slavery (MDS) or child trafficking concerns. The evidence may follow a missing episode, or increasing occasions of a child truanting from

school, staying out late, associating with new peers/associates where there may be some concerns or known intelligence risk.

10. Confidentiality

When making reports staff will consider confidentiality and anonymity. Further details of this in paragraphs Annex F of KCSIE 2026 and Crown Prosecution Service CPS: Safeguarding Children as Victims and Witnesses.

We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the *'Information Sharing Duty Statutory guidance for safeguarding organisations and their practitioners (UK Government, September 2026)'*.

There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
Information will be shared with individuals within the school who 'need to know'.
All staff are aware that they cannot promise a child to keep a disclosure confidential.

11. Dealing with allegations against adults who work with children

If a concern is raised about the practice or behaviour of a member of staff and the concern meets the **Harms Threshold,** this information must be recorded and passed to the Headmaster, **Mr Andrew Harve**y. In the case of an allegation concerning children within the EYFS, the School will comply with the requirements of the EYFS statutory framework (2026). Where an allegation of harm is made against a person who works with children, or another person covered by the statutory notification requirements, the School will make any required notification to the relevant regulator within the statutory timescale.

Suitability to work with children is an ongoing requirement. Staff must inform the School without delay of any information or change in circumstances that may affect their suitability to work with children. The School will consider any information received and take appropriate action to safeguarding children.

The Local Authority Designated Officer (LADO) will be contacted and the relevant guidance will be followed. For low level concerns the information must be recorded and passed to the Headmaster.

If the allegation is against the Headmaster, the person receiving the allegation will contact Chair of Governors directly. If the Chair of Governors is not contactable, the reporting individual will contact the LADO direct.

Low Level Concerns (LLCs) which do not reach the allegations harm threshold (or complaints criteria) should be dealt with under The School's Low Level Concerns Policy.

Further guidance on contacting the LADO can found at: Allegations against adults in the children's workforce | Children and Families | Hampshire County Council

12. Procedure

This procedure should be used in all cases in which it is alleged a member of staff or volunteer in a school, or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or

- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Headmaster as soon as possible
- If an allegation is made against the Headmaster, the concerns need to be raised with the Chair of Governor as soon as possible, without making the Headmaster assured of compliance the referral. If the Chair of Governors is not available, then the LADO should be contacted directly.
- There may be situations when the Headmaster or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headmaster or Chair of Governors they will contact the LADO on 01962 876364 or via the Hampshire LADO Enquiry Form sent to LADO@hants.gov.uk as soon as possible and before carrying out any investigation into the allegation.
- Inform the parents of the allegation unless there is a good reason not to

In liaison with the LADO, the school will determine how to proceed and if necessary the LADO will refer the matter to Children's Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the school to seek guidance from their personnel/HR provider in following procedures set out in 'Keeping Children Safe in Education' (2021) and the HSCP procedures.

13. Whistleblowing in a safeguarding context

The school has a separate whistleblowing policy, detailed in the Staff Code of Conduct, this is a summary which outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

At Twyford School, the Headmaster, Mr Andrew Harvey, is the senior manager and responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes, or behaving in a way that is placing children at risk, you should in the first place make the Headmaster aware.

If your concern is about the Headmaster then you would raise this with the Chair of Governors by email, or via the Bursar.

If you believe that a member of the school staff is harming a child (an allegation) and this has been reported to the Headteacher and no action has been taken, or the member of staff you have concerns about is the Headteacher, then you are able to contact the Local Authority Designated Officers (LADOs)

on 01962 876364 or child.protection@hants.gov.uk . If you would prefer to raise your concerns outside of the school, then you are able to contact the **NSPCC whistleblowing line** on 0800 028 0285 or email help@nspcc.org.uk for national organisations.

If you believe that a child is being abused by individuals outside of the school, then you are able to make a direct referral to Children's Social Care by calling 0300 555 1384 (office hours) or 0300 555 1373 (outside of office hours) or at LADO@hants.gov.uk. In this case you should also inform the Headmaster.

14. What is child abuse?

The following definitions are taken from Working Together to Safeguard Children 2026 HM Government (2023). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation.

15. What is abuse and neglect?

Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse , neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its side effects. Abuse can take place wholly online, or technology used to facilitate offline abuse. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. Abuse neglect, exploitation and safeguarding issues are rarely stand-alone events and cannot be covered by one definition or label alone. In most cases multiple issues will overlap.

16. What is Physical abuse?

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

17. What is Emotional abuse?

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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. Staff must recognise racism, faith-based prejudice and other discrimination as harm in its own right. Racism and faith-targeted abuse can significantly affect a child's welfare, wellbeing and sense of safety.

18. What is Sexual abuse?

Sexual abuse involves forcing, causing or inciting children into sexual activity, not necessarily involving a high level of violence, whether or not the child is assured of compliance 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. Children are more likely to know their abuser than not. Children under the age of 13 can never consent to sexual activity.

Sexual exploitation is seen as a separate category of sexual abuse. Indicators of CSE can be found below and in KCSiE 2026.

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.

19. What is Neglect?

Neglect is the persistent failure to meet a child's basic physical and/or developmental needs. Neglect includes failure to provide for a child's health, education, emotional development, nutrition, clothing, shelter, safety and safe living conditions and includes exclusion of the child from home and abandonment. likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

To support the local context, all staff have access to the Hampshire Safeguarding Children Partnership (HSCP), with definitions of types of neglect, recognising neglect threshold chart and toolkit.

20. Indicators of abuse

Neglect

The nature of neglect
Neglect is a lack of parental care, but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on child protection plans than to all the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of children under 12:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted

- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The HSCP neglect strategy provides a more detailed list of indicators of neglect and is available to all staff.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

The nature of emotional abuse
Most harm is produced in *low warmth, high criticism* homes, not from single incidents.
Emotional abuse is difficult to define, identify/recognise and/or prove.
Emotional abuse is chronic and cumulative and has a long-term impact.
All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
Children can be harmed by witnessing someone harming another person – as in domestic violence.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.
- Behaviour
- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g., shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map (annex 3*)* can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries, and no child should be asked to remove clothing by a member of staff of the school.

- Indicators of physical abuse / factors that should increase concern
- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or tide marks
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

21. Sexual abuse

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, people working with the child in school, faith settings, clubs or

activities. Children can also be subject to child sexual exploitation. Sexual abuse involves forcing, causing or inciting children into sexual activity. Children under the age of 13 can never consent to sexual activity.

Sexual exploitation is seen as a separate category of sexual abuse. Indicators of CSE can be found in the school's safeguarding policy and KCSiE 2026.

Characteristics of child sexual abuse:

it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women and young people (including other children) sexually abuse too.

Indicators of sexual abuse

Physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

22. Technology

Children are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline. Children can abuse other children online through abusive, harassing and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

23. Early Help

Hampshire Safeguarding Children Partnership publish a threshold document that describes the processes of assessment, and the criteria for when a case should be referred to the local authority children's social care for assessment and services under:

section 17 of the Children Act 1989 (children in need);
section 47 of the Children Act 1989 (reasonable cause to suspect children suffering or likely to suffer significant harm);
section 31 (care orders); and
section 20 (duty to accommodate a child) of the Children Act 1989

It is well recognised that the provision of early help is more effective than reacting later. This requires identification and response to problems as soon as they emerge. Often this will be most effective within the school setting (universal provision).

Early help -has additional needs identified within the setting that can be met within identified resources through a single-agency response and partnership working.

Targeted Early Help- Early help can lead to support plans being put in place to assist families in managing emerging problems.

All staff must look out for children who may benefit from early help, and how our procedures work. Staff need to know that there is greater need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- has mental health needs
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care; and/or
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is frequently missing/goes missing from education, health and care
- has a parent/family member/carer in custody, or is affected by parental offending
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has returned home to their family from care
- is privately fostered
- is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage.

24. Early Help Procedures

Staff with concerns about the welfare of a child, but where it is *not* considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm, or is likely to do so, should discuss their concerns with *Mrs Jen Burnett*, Miss Pippa Higham and Mr Tom Parsons DSL. Mrs Sharni Balint is Deputy Head Operations and Miss Pippa Higham is Assistant Head of Wellbeing and Pastoral Care and they have an overview of many elements of pupil welfare that do not meet the threshold of safeguarding. They have responsibility for individual welfare plans for pupils in the school and have regular meetings with the School Nurse, Independent Listener and SENDCo on pupil welfare issues.

All Heads of Years, Head of Boarding and individual tutors will bring pastoral concerns to them. They are ideally placed to coordinate early help planning and assessments. In cases where inter-agency working is involved or safeguarding thresholds have been met, Mr Tom Parsons, as DSL, will take on the lead role. Mrs Sharni Balint, Miss Pippa Higham, Mrs Kealey Taylor and Mr Tom Parsons will keep the Headmaster informed at all times of any pupil undergoing assessment or receiving support in this way.

It is essential that discussions take place early on with parents and the child concerned, as the processes may either not go forward without agreement of all parties, or they can be less effective, at least.

Mr Tom Parsons as DSL will contact the local authority (usually through the Multi-Agency Safeguarding Hub) to initiate the assessment process for an individual and family where it is decided that this is in the best interests of the child.

25. Technologies

Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to manipulate, exploit and abuse them.

Twyford School meets the Digital and Technology Standards in Schools and Colleges Guidance DfE March 2023 by:

1. Assigning roles and responsibilities for the oversight of online safety across the school and
2. The creation of an IT safety team to include: the DSL, a member of the SLT, The Head of ICT Services and the Lead Teacher for digital learning.
3. Reviewing and reporting on the effectiveness of monitoring and filtering systems and the way that the team responds to concerns.
4. Blocking inappropriate content without unreasonably impacting on learning or school administration.
5. Effectively monitoring online usage

The DSL will provide a weekly update to SLT about online safety issues and make a termly report to governors.

The School will ensure that there are appropriate filtering and monitoring in place on all school devices and school networks. Staff training will include understanding of roles and responsibilities in relation to filtering and monitoring. To support schools with this the DfE have produced the following guidance https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/updates

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies and generative AI. Guidance on e-security is available from the National Education Network. In addition, schools and colleges should consider meeting the Cyber security standards for schools and colleges.GOV.UK. Broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - NCSC.GOV.UK

Gov.UK 2025 Generative AI expectations changed to Generative AI Mandatory standards. This shift reflects that the gap between technological adoption and safeguarding preparedness is the most significant and growing risk.

Twyford School have Risk assessed use of AI and have a separate policy.

The Department has published https://www.gov.uk/government/publications/generative-ai-product-safety-standards/generative-ai-product-safety-standards to support schools to use generative artificial intelligence safely, and explains how updated filtering standards with enhanced contextual understanding apply to the use of generative AI in education. Four new safeguarding risk domains have been included in the 2026 standards: Cognitive development; Emotional and Social development; Mental health issues and Manipulation.

Children can be directed towards the Lucy Faithfull Foundation 'Shore Space', an online resource which works to prevent harmful sexual behaviour (including a confidential chat service for young people).

26. Online Safety and Social Media

With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint
- Online challenges
- accessing and generating inappropriate content
- misinformation, disinformation (including fake news), conspiracy theories
- generative artificial intelligence.

The school will therefore seek to provide information and awareness to both pupils and their parents through:

- Acceptable use agreements for children, teachers, parents/carers and governors
- Curriculum activities involving raising awareness around staying safe online and when accessing remote learning (via PSHEE, IT lessons, Assemblies, Chapel, Form and Tutor Time)
- Information included in letters, newsletters, web site
- Parents evenings, training sessions and parent talks from Internet safety specialists
- High profile events / campaigns e.g. Safer Internet Day, Anti-Bullying Day
- Building awareness around information that is held on relevant web sites and or publications

- Informing parents with regards to the systems used to filter and monitor the online use of the children.

The school considers online safety with the context of the 4 Cs: content, contact, conduct and commerce:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

We ensure that online safety is a running and interrelated theme when devising and implementing policies and procedures and that there are appropriate filtering and monitoring in place on all school devices and school networks. Staff training includes understanding roles and responsibilities in relation to filtering and monitoring.

In developing our online safety policies and procedures we will refer to the DfE updates in guidance: Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk) and the department's Plan technology for your school - GOV.UK to carry out a self-assessment against the filtering and monitoring standards.

We understand that education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We are aware that guidance on e-security is available from the National Education Network. In addition, schools and colleges should consider meeting the Cyber security standards for schools and colleges.GOV.UK. and that broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - NCSC.GOV.UK.

We will consider how online safety, including the use of generative artificial intelligence, is reflected as required in all relevant policies and embedded across all areas of the curriculum, included in teacher training and within the role and responsibilities of the designated safeguarding lead as well as discussions with parents.

We understand that technology, and risks and harms related to it, evolve, and change rapidly and we will carry out regular reviews of our approach to online safety to consider and reflect the risks to our pupils.

27. Mobile phones and smart technology:

Staff:

Staff must be mindful of their use of personal mobile phones during the School day and are reminded that any private use of personal phones, including wearable technology within the EYFS, should not take place when teaching or supervising children, or when moving around parts of the School site where pupils are present. Staff who bring personal mobile phones into School must ensure that there is no inappropriate or illegal content on them.

Staff should use mobile phones belonging to the setting wherever possible. However, the School recognises there may be times when it is necessary for staff to use their personal mobile phones at work where it is not possible to use a School device. Where necessary, personal mobile phones may be used for:

- Registration purposes on the SOCS platform for clubs.
- Authentication on systems such as CPOMS.
- Accessing apps for scoring purposes in sports fixtures.
- Medical Emergencies

When not in use, personal mobile phones should be either turned off or on silent during the School day. Personal phones may be kept in person in pockets etc. The exception to this is within the Early Years setting where personal phones are stored safely away from pupils during working hours.

Photographs must not be taken of the children on any personal phones, wearable technology, or any other personal information storage device. Only School-owned devices can be used to take photographs or videos.

In the vast majority of cases, staff should use School mobile phones or the School landline to communicate with parents. However, it is acknowledged that there may be occasions, such as attending sports fixtures at other schools, where it is necessary to communicate with parents/carers using personal phones. The same applies to residential and day trips. It is likely that some staff may not wish to use personal mobile phones to contact parents but may have to do so in an emergency. Staff are advised to withhold the telephone number if using their personal phones to contact parents. It is recognised that Visiting Music Teachers may need to use personal phones to aid their teaching, but within clear parameters. The full guidance around use of mobile phones for Visiting Music Teachers is stipulated within the Music Department guidance for Visiting Music Teachers

Twyford School is not responsible for the loss, damage or theft of any personal mobile device.

All members of staff should remain vigilant and report any concerns around mobile phone usage to the Designated Safeguarding Lead (DSL). Parents and staff are informed of the complaints procedure and staff made assured of compliance the whistleblowing procedure.

If a member of staff breaches the mobile phone policy, action will be taken in line with the Staff Code of Conduct policy.

If a member of staff is thought to have illegal content on a mobile phone or have committed a criminal offence using a personal device or mobile phone, the police will be contacted and the LADO (Local Authority Designated Officer) will be informed.

Staff or visitors may not wear or bring Smart Glasses to School.

Use of School's mobile phones and devices:

EYFS:
In addition to personal mobile phones, Early Years providers, teachers and minibus drivers must also consider the safe use of any School devices. Mobile phones and tablets can be valuable resources for taking photographic and video images of pupils for teaching and learning purposes, to record progress or to celebrate achievement. However, this should be used in conjunction with the e-safety and acceptable use IT policies. Within EYFS personal mobile phones, Smart watches and other personal electronic devices with imagine or sharing capability must not be used by staff caring for children. Personal devises must not be used to photograph video or record children. Photographs and recording of children must only be taken using School authorised devices and for an approved purpose. School iPads, cameras and other electronic devices must be appropriately secured when not in use and must not be left where children can access them without appropriate supervision. Staff must ensure that devices containing children's information, photographs or recoding are securely stored and accessed only by authorised users. Any loss, unauthorised access or safeguarding concern must be reported immediately in accordance with School procedures.

The School's mobile phones or tablets must only be used by members of staff for work purposes.

The School's devices will / should not have any social media or messaging apps on them. Leaders must ensure any apps downloaded onto School devices are age and content appropriate for the children or staff using them.

Passwords for School devices must not be shared or written down and will be changed regularly.

Mobile phones and devices belonging to Twyford will always be used in accordance with the acceptable IT use policy. Activity may be monitored for safeguarding reasons and to ensure policy compliance.

Parental permission must be obtained on joining School for the use of photographs or videos of children.

Parents using phones for taking photos of their children at events is permissible, but these should never be shared on social media if they contain images of other people's children.

Children are not permitted to bring mobile phones or other smart technology devices into School. This includes Smart Glasses. Internet enabled/ Smart watches should not be worn. The only exceptions to the rules around mobile phones are for:

- weekly boarders in Year 8 who may occasionally bring phones into School, but they must be kept with matrons.
- children with medical needs requiring a mobile phone.

28. Cyberbullying

Central to the school's anti-bullying policy is the principle that '*bullying is always unacceptable'* and that '*all pupils have a right not to be bullied*'.

The School also recognises that it must take note of bullying perpetrated outside school which spills over into the school; therefore, once aware we will respond to any cyber-bullying, we become assured of compliance carried out by pupils when they are away from the site.

Cyber-bullying is defined as 'an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself.'

By cyber-bullying, we mean bullying by electronic media

- bullying by texts or messages or calls on mobile 'phones
- the use of mobile 'phone cameras to cause distress, fear or humiliation
- posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- using e-mail to message others
- hijacking/cloning e-mail accounts
- making threatening, abusive, defamatory or humiliating remarks in on-line forums

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.

Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

If we become assured of compliance any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. The school will pass on information to the police if it feels that it is appropriate or is required to do so.

29. Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a deputy), should consider referring into the Cyber Choices programme.

This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

30. Sexting/Youth Produced Sexual Imagery

Advice from **Sexting in schools and colleges: responding to incidents and safeguarding young people 2016. UK Council for Child and Internet Safety July 2016**)

It is essential for staff in schools to have a good understanding of the issues arising from young people sharing imagery. Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat, WhatsApp or Facebook Messenger. 90% of 16 - 25 year olds and 69% of 12 - 15 year olds own a smartphone, giving them the ability to quickly and easily create and share photos and videos.

'Youth produced sexual Imagery'(YPSI) often refers to the sharing of naked or 'nude' pictures or video through mobile phones and/or the internet. It also includes underwear shots, sexual poses and explicit text messaging.

While YPSI often takes place in a consensual relationship between two young people, the use of sexual images in revenge following a relationship breakdown is becoming more commonplace. YPSI can also be used as a form of sexual exploitation and take place between strangers.

As the average age of first smartphone or camera enabled tablet is 6 years old, YPSI is an issue that requires awareness raising across all ages.
The school will use age-appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the school for advice.

A 2016 NSPCC / Office of the Children's Commissioner England study found that just over one in ten boys and girls (13%) had taken topless pictures of themselves (around one in four of those were girls) and 3% had taken fully naked pictures. Of those who had taken sexual images, 55% had shared them with others. 31% of this group had also shared the image with someone that they did not know.

31. The Law

Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically:
It is an offence to possess, distribute, show and make indecent images of children.
The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or District Judge to decide based on what is the recognised standard of propriety 13. For most purposes, if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

The law criminalising indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children. Despite this, young people who share sexual imagery of themselves, or peers, are breaking the law.

We should not, however, unnecessarily criminalise children. Children with a criminal record face stigma and discrimination in accessing education, training, employment, travel and housing and these obstacles can follow a child into adulthood. Whilst young people creating and sharing sexual imagery can be very risky, it

is often the result of young people's natural curiosity about sex and their exploration of relationships. Often, young people need education, support or safeguarding, not criminalisation.

The National Police Chiefs Council (NPCC) has made clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues. Schools may respond to incidents without involving the police. Advice on the circumstances in which this would be appropriate can be found in the UKCCIS advice Section 2. The police may, however, need to be involved in cases to ensure thorough investigation including collection of all evidence (for example, through multi-agency checks), and there are incidents, highlighted in this advice, which should always be referred to the police (see Section 2). Even when the police are involved, however, a criminal justice response and formal sanction against a young person would only be considered proportionate in certain circumstances.

Whilst professionals refer to the issue as 'YPSI' there is no clear definition of it. Many professionals consider YPSI to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Yet when young people are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know'. Similarly, many parents think of sexting as flirty or sexual text messages rather than images. This advice only covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management. On this basis this advice introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting.' This is to ensure clarity about the issues this advice addresses.

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing sexual images of under-18s is also illegal. Although the production of such imagery will likely take place outside of school, these issues often manifest in schools, colleges and organisations working with children and young people.

Schools, colleges and other organisations need to be able to respond swiftly and confidently to ensure that children are safeguarded, supported and educated. This advice aims to support schools in developing procedures to respond to incidents involving youth produced sexual imagery. It also signposts sources of resources and support.

'Youth produced sexual imagery' best describes the practice because:

'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
'Imagery' covers both still photos and moving videos.

The types of incidents which this advice covers are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

This advice does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police.
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

32. Procedures at Twyford School following Disclosure about sexting / youth produced sexual imagery

All incidents involving youth produced sexual imagery will be responded to in line with the school's safeguarding policy. Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, tutor, Matron, School/Independent Listener, DSL, or any member of the school staff. They may report through an existing reporting structure (eg worried@twyfordschool.com or bullying@twyfordschool.com emails), or a friend or parent may inform someone in school or inform the police directly. All members of staff (including volunteers, governors or contractors) should be made assured of compliance on how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This will be covered within staff training and within the school's child protection policy.

When an incident involving youth produced sexual imagery comes to the school's attention:
The incident should be referred to the DSL as soon as possible.
The DSL should hold an initial review meeting with appropriate school staff.

There should be subsequent interviews with the young people involved (if appropriate).
Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.
It is likely that the DSL will discuss the case with the LADO.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

Advice from UKCCIS suggests: 'If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care. If you have any doubts about whether to involve other agencies, you should make a referral to the police'.

The DSL will assess risk:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the young people involved?
- Do the young people involved have additional vulnerabilities?
- Does the young person understand consent?

- Has the young person taken part in this kind of activity before?

Parents or carers will be informed at an early stage unless informing the parent will put the child at risk of harm. Any decision not to inform parents will be taken in conjunction with other agencies such as Children's Social Care/Police.

33. Searching devices, viewing and deleting imagery

Adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Under no circumstances should such imagery be sent on to another address. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery. The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the safeguarding policy and procedures. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil. If a decision is made to view imagery, the DSL would need to be satisfied that viewing: is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved); is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery, then the DSL should:

- never copy, print or share the imagery; this is illegal.
- discuss the decision to view with the Headmaster.
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headmaster.
- ensure viewing takes place with another member of staff present in the room, ideally the Headmaster, or a member of the Senior Leadership Team. This staff member does not need to view the images.
- wherever possible ensure viewing takes place on school or college premises, ideally in the Headmaster or a member of the senior leadership team's office.
- ensure wherever possible that images are viewed by a staff member of the same gender as the young person in the imagery.
- record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted and ISI for recording safeguarding incidents.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Headmaster can examine data or files, and delete these, where there is good reason to do so. However, advice here is that no imagery should be deleted except at the specific instruction of the Headmaster, who may have consulted the Police or LADO first.

This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone. If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they should immediately inform the Headmaster before taking action to view the material. It is likely that it will need to be retained as evidence in case there has been a criminal offence or a breach of school discipline. The Headmaster will decide whether the material is of such seriousness that the police need to be involved.

34. Educating young people about youth produced sexual imagery

Teaching about safeguarding issues in the classroom can prevent harm by providing young people with skills, attributes and knowledge to help them navigate risks. Addressing sensitive issues promotes a whole school approach to safeguarding, giving young people the space to explore key issues and the confidence to seek the support of adults should they encounter problems. Keeping Children Safe in Education (September 2025) statutory guidance states that schools 'should ensure children are taught about safeguarding, including online, through teaching and learning opportunities'. In line with this, schools should provide young people with opportunities to learn about the issue of youth produced sexual imagery.

35. How should we teach young people about youth produced sexual imagery?

Learning about youth produced sexual imagery cannot be taught in isolation. Learning will be located within a developmental RSHE education programme, as well as in the school's IT teaching programme. Teaching will also reflect the principles articulated in 'Key principles of effective prevention education' - produced by the PSHE Association on behalf of NCA-CEOP. Given the potential sensitivity of these lessons it is essential that this issue is taught within an emotionally safe classroom climate where clear ground rules have been negotiated and established and where boundaries around teacher confidentiality have been clarified. If during any lesson teachers suspect any child or young person is vulnerable or at risk the school's safeguarding protocols should always be followed. Schools will consider:

What specific learning is provided in the curriculum about youth produced sexual imagery? This focuses on factual information and will include:

- what it is
- how it is most likely to be encountered or the consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- issues of legality
- the risk of damage to peoples' feelings and reputation
- what specific learning is provided to ensure children and young people have the strategies and skills required to manage:
- specific requests or pressure to provide (or forward) such images
- the receipt of such images
- this will include who to tell; what to say; what to do; what not to do and where to get support from within and outside of the school
- what underpinning protective learning is being provided by the school's planned PSHE education programme and wider curriculum? This will include work on:
- communication
- understanding healthy relationships including trust
- understanding and respecting the concept of genuine consent
- understanding our rights (especially our collective right to be safe and to feel safe)
- recognising abusive and coercive language and behaviours
- accepting our responsibilities (especially our responsibility to respect others trust and protect their right to be physically, emotionally and reputationally safe)
- without this underpinning learning, specific learning about youth produced sexual imagery, may have limited impact.

References:
KCSiE (DfE 202)
Sexual Violence and Sexual Harassment between Children in Schools and Colleges (DfE 2018)
Sexting in Schools and Colleges: responding to incidents and safeguarding young people (2016)

36. Gaming

Online gaming is an activity in which the majority of children and many adults get involved. The school will raise awareness by:

- Curriculum activities involving raising awareness around staying safe online (via PSHEE, IT lessons, Assemblies, Chapel, Form and Tutor Time)
- By talking to parents and carers about the games their children play and helping them identify whether they are age-appropriate
- By supporting parents in identifying the most effective way to safeguard their children by using parental controls and child safety mode
- By talking to parents about setting boundaries and time limits when games are played
- By highlighting relevant resources.

37. Online reputation

Online reputation is the opinion others get of a person when they encounter them on-line. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations and work establishments, including Twyford School, now check digital footprint before considering applications for positions or places on courses.

38. Grooming

On-line grooming is the process by which one person with an inappropriate sexual interest in children will approach a child on-line, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

The school will build awareness amongst children and parents about ensuring that the child:

- Only has friends on-line that they know in real life
- Is aware that if they communicate with somebody that they have met on-line, that relationship should stay on-line.

That the school will support parents to:

- recognise the signs of grooming
- have regular conversations with their children about on-line activity and how to stay safe on-line

The school will raise awareness by:

- Curriculum activities involving raising awareness around staying safe online (via RSHE, IT lessons, Assemblies, Chapel, Form and Tutor Time)
- running sessions for parents
- include awareness around grooming as part of their curriculum
- identifying with parents and children how they can be safeguarded against grooming.

39. Contextual Safeguarding

The definition of Contextual Safeguarding is "an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts."

As a school, we will consider the various factors that have an interplay with the life of any pupil about whom we have concerns within the school and the level of influence that these factors have on their ability to be protected and remain free from harm particularly when it comes to child exploitation or criminal activity.

While this term applies to this specific definition, the notion of considering a child within a specific context is also important. What life is like for a child outside the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

We recognise that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition.

Safeguarding procedures

40. Safer Recruitment

The school operates a Safer Recruitment Process. On all recruitment panels there is at least one member who has undertaken safer recruitment training.

The recruitment process checks the identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references.

DBS checks are made on volunteers and risk management process instigated until disclosure returned. An online search will be carried out on shortlisted candidates and candidates will be made assured of compliance this. This may help identify any incidents or issues that have happened, and are publicly available online, which can be explored with the applicant at interview.

Volunteers working within the EYFS will be subject to the enhanced criminal record checks required by the EYFS Statutory Framework. Where a volunteers is engaging in regulated activity with children, an enhanced DBS check including the children's barred list information will be obtained in accordance with statutory requirements. New employees working within EYFS must not commence employment before the required criminal record check has been received.

41. Staff Induction

The DSL or their deputy will provide all new staff with training to enable them to both fulfil their role and also to understand the child protection procedures, the safeguarding policy, the staff behaviour policy/code of conduct, and part one of Keeping Children Safe in Education 2026.

Regular safeguarding updates are delivered to all staff at least termly.
Every new member of the teaching and non-teaching staff, including new peripatetic musicians, sports coaches and third -party catering and cleaning staff, are required to attend a Twyford School Safeguarding Awareness Course.

This will be organised by the Designated Safeguarding Lead. Every effort will be made to complete this training prior to first contact with children, and this may be on the first Induction Day. Where this is not possible, a risk assessment will be instigated. All support staff are also required to be given the same training in child protection. The only adults who work or visit the school who are exempted from this requirement are:

- Occasional visitors, including occasional lecturers and contractors, who sign in and are given a security badges by our office staff; these visitors are constantly under the direct supervision of our own staff.
- Contractors working on a designated site that is physically separated from the rest of the school, who are required to sign in and out at their site office and to be easily identifiable at all times.

Every member of staff needs to be confident that he or she understands his or her role in:

- Keeping children safe
- Promoting the welfare of pupils
- Promoting equal opportunities and inclusion
- Preventing bullying and harassment
- Understanding and being assured of compliance the signs and symptoms of child abuse
- Keeping themselves safe from unfounded allegations

Everyone is required to take part in the training, no matter what their previous background or level of expertise. Updates to procedures or statutory requirements are presented at staff meetings. Refresher training from an external trainer is provided for all staff at three yearly intervals. In practice, there is a termly update at the start of each term. This takes place at Inset Day and covers any policies or practices that may have changed or been affected by legislation.

New staff complete online training units through Educare in: Safeguarding in Schools, Preventing Bullying; Prevent; Child-on-Child abuse; Cyber Security.
New staff must read, and sign to confirm reading, of:

- Twyford School Safeguarding and Child Protection Policy
- Twyford School Behaviour Policy
- Twyford School Code of Conduct and Teachers' Standards
- Twyford School Missing Child Policy
- Keeping Children Safe in Education (part 1)
- Twyford School Anti-Bullying and Cyber-Bullying Policy
- Twyford School Whistleblowing policy(Public interest disclosures policy)
- Twyford School Low Level Concerns Policy

This induction may be covered within the annual training if this falls at the same time; otherwise it will be carried out separately during the initial starting period.

43. Health and Safety

The site, the equipment and the activities carried out as part of the curriculum are all required to comply with the Health and Safety at Work act 1974 and regulations made under the act.

All risks are required to be assessed and recorded plans of how to manage the risk are in place. The plans should always take a common sense and proportionate approach to allow activities to be safe rather than preventing them from taking place. The school has a Health and Safety policy which details the actions that we take in more detail'.
Dogs may be brought onto the School site on the days of School sports fixtures, however they must be kept under close control on a lead. Dogs may not be brought onto the School premises at any other time. Banned dogs breeds must not be brought onto the site premises, regardless of whether the owner holds a certificate of exemption irrespective of whether the owner holds a certificate of exemption.

In accordance with the EYFS Statutory Framework (2026), banned dog breeds must not be kept or be present on site premises where EYFS provision is provided. This prohibition applies irrespective of whether the owner holds a certificate of exemption.

44. Site Security

We aim to provide a secure site but recognise that the site is only as secure as the people who use it. Therefore, all people on the site have to adhere to the rules which govern it. These are:

- Appropriate doors are locked except at the start and end of the school day
- Doors are kept closed to prevent intrusion
- Visitors and volunteers enter at the reception and must sign in
- Visitors and volunteers are identified by a red colour-coded photo-identity card produced at Reception, and worn by the visitor or volunteer at all times.
- Children are only allowed home during the school day with adults/carers with parental responsibility or permission being given
- All children leaving or returning during the school day have to sign out and in
- Empty classrooms have windows closed
- We have a Critical Incident Management Plan and Team to respond to any emergencies.

45. Off site visits

A particular strand of health and safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from the school and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment will be needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out.

The school has an educational visits co-ordinator (EVC) Mrs Sharni Balint, who guides staff through the approval processes. She helps colleagues in schools to manage risks and support with off site visits and provides training in the management of groups during off site visits. See EVC policy.
The Matrons provides guidance and training (where necessary) in the specific management of pupils with medical needs while on an educational visit. Almost all staff are trained in First Aid and/or Paediatric First Aid.

46. First Aid

Please see Twyford School First Aid Policy.

47. Physical Intervention (use of reasonable force)

Any use of restrictive physical intervention is carried out in accordance with national guidance in force for 2026 and the School's Restrictive Intervention Policy.

Restrictive physical intervention is used only as a last resort, is reasonable, proportionate and necessary, and is applied to prevent injury, serious disruption or risk to safety.

All incidents involving restrictive physical intervention are recorded, reported to senior leadership, and monitored to ensure appropriate practice and staff training.

Please see Twyford School Restrictive Intervention Policy.

48. Taking and the use and storage of images

As a school we seek consent from the parent of a pupil before taking and publishing photographs or videos that contain their images. This consent is usually obtained upon the child joining Twyford. A register is kept of all permissions and of any that do not give consent. Staff must not take photographs of children on their personal devices.

Unless otherwise authorised in advance by the Headmaster, photographs will only be taken on school owned equipment and stored on the school network.

See more detailed requirements in Staff Code of Conduct.

49. Transporting pupils

On occasions parents and volunteers support with the task of transporting children to visits and off-site activities arranged by the school. (This is in addition to any informal arrangements made directly between parents for after school clubs etc.)
In managing these arrangements the school will put in place measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars. This is based on guidance from the local authority and follows similar procedures for school staff using their cars on school business.

Where parents'/volunteers' cars are used on school activities the school will notify parents/volunteers of their responsibilities for the safety of pupils, to maintain suitable
insurance cover and to ensure their vehicle is roadworthy.

All parents/volunteers are therefore asked to complete and return the form attached in the above link to the school before they offer to use their car to help with transporting pupils.

See more detailed advice in Staff Code of Conduct.

50. Disqualification under the childcare act

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare.
We will continue to check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.

Useful contacts

Key Personnel	Name (s)	Telephone No.
DSL	Mr Tom Parsons	Safeguarding team contact: 01962 672285 -give code 2580. You then may choose the option for the member of staff you would like to contact.
Deputy DSL(s)	Miss Pippa Higham Mrs Kealey Taylor Miss Laura Marks Miss Claire Smith Mrs Sharni Baliant Mr Adam Cleaver	School 01962 712269
School's named "Prevent" Lead	Mr Tom Parsons	
Nominated Safeguarding Governor	Mr Aurélien Vieilleville	School 01962 621302
Chair of Governors	Mrs Emily Fisher	01962 712269
Children's Reception Team	N/A	01329 225379
Out of hours social care	N/A	0300 555 1373
Police	N/A	101 or in emergencies 999
Safeguarding advisors / Local Authority Designated Officers (LADOs)	Barbara Piddington Fiona Armfield Mark Blackwell	HCC Safeguarding Unit 01962 876364 Child.protection@hants.gov.uk LADO@hants.gov.uk
School nurse	Mrs Alison Thompson	01962 712269
School matron	Mrs Mandy Cummings, Mrs Victoria Bartlett, Mrs Jenny Fowles Mrs Amanda Draisey	01962 712269

Boarding Matron	Mrs Caroline Matravers-Scott	01962 712269

Appendix 1

Preventing Radicalisation and Extremism

The Prevent Duty

The Prevent duty is the duty in the Counter Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. It is essential that staff are able to identify children who may be susceptible to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is seen as part of Twyford's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. General safeguarding principles apply to keeping children safe from the risk of radicalisation as set out in the relevant statutory guidance: Working Together to Safeguard Children 2026 (2018) and Keeping Children Safe in Education (2025).

We build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. We reduce permissive environments by limiting exposure to radicalising narratives, both online and offline, by creating an environment where radicalising ideologies are challenged and not permitted to flourish.
As a school we recognise that a pupil's susceptibility to radicalisation may be linked to their vulnerability. The school has robust safeguarding and pastoral systems which identify any children who may be vulnerable to radicalisation.

Staff should understand when it is appropriate to make a referral to the Channel programme. When staff identify a concern, which requires a referral into Prevent, it is important that they can indicate why this risk is relevant to Prevent. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. Channel provides a programme of support for individuals who are vulnerable to being drawn into terrorism. It has existed since 2012, administered through multi-agency panels at local level. Channel can provide theological and ideological mentoring.
There are several strands to the Duty:

Risk Assessments

Assess the general level of risk, depending on geographical area or intake, of pupils being subject to exploitation or drawn into terrorism/extremist activity. We consider the general context of Twyford School and its parent/pupil/staff community to be low risk, but we are alert.

Put in place means to identify individual children who may be at risk of radicalization or being drawn into terrorism/extremist activity.

The general risks affecting children and young people may vary from area to area, and according to their age. Schools and childcare providers are in an important position to identify risks within a given local context. It is important that we understand these risks so that School can respond in an appropriate and proportionate way. At the same time, we are alert to the increased risk of online radicalisation, as

terrorist organisations such as ISIs seek to radicalise young people through the use of social media and the internet.

The local authority and local police are contacted to provide contextual information to help us understand the risks in this area.

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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. Children influenced in this way by family attitudes are sometimes referred to as 'terror tots'. The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour. A young person's susceptibility to radicalisation may be linked to their vulnerability. A person can be vulnerable if they need special care, support or protection because of age, disability, risk of abuse of neglect. The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- refusal to engage with, or becoming abusive to, peers who are different from themselves
- becoming susceptible to conspiracy theories and feelings of persecution
- changes in friendship groups and appearance
- rejecting activities they used to enjoy
- converting to a new religion
- isolating themselves from family and friends
- talking as if from a scripted speech
- an unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use
- expressions of sympathy for extremist ideologies and groups, or justification of their actions
- accessing extremist material online, including on Facebook or Twitter
- possessing extremist literature
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying, or discrimination.

It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

A Vulnerability Assessment Framework can be used to assess whether an individual pupil is at risk of being drawn into extremism, based on:

1. **Engagement with a group, cause or ideology** (The engagement factors are sometimes referred to as 'psychological hooks'. They include the needs, susceptibilities, motivations and contextual influences that together can map an individual's pathway into terrorism)

2. **Intent to cause harm** (Intent factors describe the mind-set that is associated with a readiness to use violence and address what the individual would do and to what end)

3. **Capability to cause harm** (Plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What an individual is capable of is therefore a key consideration for those who are tasked with assessing the risk of harm to the public).

Policies and Procedures

We have clear safeguarding policies and procedures in place to identify children at risk and protect them. Our safeguarding policies include when it is appropriate to make a referral about a child at risk, whether to Children's Services in the normal way or to make a referral to the Channel programme, for early intervention. We refer any concerns to the DSL, who will decide which course of action is most appropriate. We provide for a single point of contact to oversee and coordinate the school's implementation of the Prevent duty - at Twyford this is the Designated Safeguarding Lead, Mr Tom Parsons.

We have guidelines and protocols to ensure that visiting speakers, whether invited by staff or pupils, are suitably assessed via internet or other background checks and are fully supervised while on the premises. Any speaker invited to Twyford must be approved by the Headmaster, who will have reviewed the assessed risk. If at any time during the visit a presentation has content that is deemed inappropriate, then Staff will intervene.
Due diligence is done on contractors and those hiring any school facilities, with a safeguarding checklist completed.

Prevent Training

All staff have received information and training on the Prevent duty, via Inset and when first employed (if this does not overlap with the start of a term), and subsequently via the DFE Prevent awareness course. Whole staff Prevent training is repeated every 2 years. Each year staff are signposted to adhere to the latest edition of KCSiE.

We utilise current resources and advice available through Hampshire Safeguarding Children Partnership and websites such as Educate Against Hate (http://educateagainsthate.com/).

Building Resilience to Radicalisation

We provide pupils with the knowledge, skills and understanding to prepare them to play a full and active part in society. It should equip pupils to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. In RSHE, pupils learn about democracy, government and how laws are made and upheld.

Pupils are also taught about the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect, tolerance and understanding. Within the RSHE syllabus we teach pupils to manage risk, resist pressure, make safer choices and seek help if necessary. In religious studies and other relevant subject syllabus/opportunity with focus on democracy, diversity, mutual respect and managing debate of contentious issues.

Prejudiced based abuse -language and behaviours, will not be tolerated, will be taken seriously and referred through normal safeguarding procedures.

IT Filtering and Monitoring Policies and Training

We ensure that children are safe from terrorist and extremist material when accessing the internet in school. We ensure that children are not exposed to illegal, inappropriate or harmful material, through rigorous filtering (also being conscious of 'over blocking' that can restrict what children can be taught).

We regularly check filters and review ICT acceptable use policies. We ensure that children are not subjected to harmful online interaction with other users. We equip (ie train) children to stay safe online, both in school and outside of school. This education is to prevent online behaviour that increases the likelihood of, or causes, harm.

We ensure teaching staff are assured of compliance the risks posed by online activity of extremist and terrorist groups. Circulation of the Home Office briefing note for schools *How Social Media is used to encourage travel to Syria and Iraq* to teaching staff have been additional and effective way of doing this.

Working in Partnership

We liaise with the HCSP to establish what advice and support they can provide and for their assessment of general levels of risk within the local area. Effective engagement with parents / the family is also important as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. The PREVENT Partnership Board is made up of a wide range of organisations across Hampshire whose remit is to oversee, coordinate and monitor *PREVENT* work at the local level. The *PREVENT* Partnership Board is chaired by Hampshire County Council and it has produced a local strategy and multi-agency action plan. The *PREVENT* Partnership Board meets every three months to monitor progress against the agreed action plan. The *PREVENT* Partnership Board works to the following objectives:

- To provide a consistent and coordinated response across Hampshire to the ideological challenge of terrorism and the threat posed by those who promote it.
- To provide leadership and direction across the area on *PREVENT* issues including the development and publication of a local strategy and action plan.
- To organise and facilitate multi-agency *PREVENT* Board meetings
- To ensure the *PREVENT* agenda is addressed as appropriate in other relevant strategic plans and strategies.
- To have oversight of *PREVENT* activity across the area ensuring this is consistent with the aims of the national strategy as well as statutory requirements and guidance.
- To ensure frontline staff have a good understanding of *PREVENT* and are trained to recognise vulnerability to being drawn into terrorism and are assured of compliance available programmes to deal with this issue.
- To act as a mechanism for holding local agencies to account for their work aimed at reducing the risk of people becoming radicalised or supporting violent extremism ensuring this work is effective, coordinated and based on strong partnership working.

What to do if you have a concern

Remember that we consider that this is a safeguarding matter, and therefore our existing robust procedures should be followed. Refer to the DSL within 25 hours. The DSL will initiate a pastoral discussion (Head of Pastoral Care, Headmaster and individual Tutor) in order to decide the correct course of action: Hants Direct, Police, Channel or DfE. The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly.

Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency safeguarding procedures should be followed.

What is Prevent and what should I do if I have a concern

Prevent **SAFEGUARDS** vulnerable adults or children who are susceptible to being drawn towards radicalisation to stop them becoming terrorists or supporting terrorism. It safeguards people in the same way as safeguarding individuals from being drawn into sexual exploitation, gangs, county lines etc. Prevent works in the **non-criminal space** so those referred will not be criminalised. **Prevent is a multi-agency response** to offer support to individuals referred and deals with **all forms of extremism** such as Right Wing and Islamist extremist. The **referral process is:**

NOTICE

Member of staff notices a concern that someone is susceptible and may be enroute to being radicalised.

If you identify that a susceptible person may be at risk of being radicalised or drawn into terrorism…. (**NOTE: If there is an IMMEDIATE RISK of a terror incident taking place, do not delay to contact DSL you MUST call 999 or the Anti-Terrorist Hotline 0800 789321, however DSL can support you if no waiting**)

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CHECK

Member of staff must check out the validity of their concern. Ask relevant non-leading questions that will help you describe your concerns and any vulnerabilities the person may have in the referral.

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SHARE

If your concern is valid then you MUST share the concern according to the perceived risk, by following our School's SAFEGUARDING procedures for making a safeguarding referral ie. reporting a concern on CPOMS.

NOTE: If there is an IMMEDIATE RISK of a terror incident taking place, do not wait to contact DSL you MUST call 999 or the Anti-Terrorist Hotline 0800 789321). This information is displayed in the staff common rooms and can be found in the safeguarding policy

Make sure you state that you are making a referral under 'PREVENT' (risk of radicalisation).

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The Prevent Single Point of Contact SPOC will then contact the referrer from school to ask them to complete the national Prevent referral form. They will assist the referrer to complete this if required. This form gathers more detail about the concern and how it is relevant to Prevent (i.e. risk of radicalisation) as well as anything in the individual's life that might be affecting their wellbeing or that might make them vulnerable.

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The **Prevent SPOC** will then send the national Prevent referral form to the Police Prevent Team who will check that it is within the scope of 'Prevent' (i.e. that it is in the non-criminal space, before a crime happens).

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The Police Prevent Team will then send a copy of the national Prevent referral form to relevant partner agencies with a request that they carry out an information sweep. **The Police Prevent Team** will carry out a Police Gateway Assessment (PGA) to decide if a case is appropriate for Channel. If it is, they complete a vulnerability assessment framework (VAF) to determine if the threshold is met for a Channel Panel

If CHANNEL PANEL **threshold is met,** then a multi-agency Channel Panel is convened to address the risk of radicalisation.		If CHANNEL PANEL **threshold is not met**, then the case is signposted to relevant partner agencies for other safeguarding support or early help

For the **check and share stage,** attempt to check and collate information that can include, but is not limited to:

YOUR CONCERNS – Describe in as much detail as possible the specific concern(s) relevant to Prevent. For example:

- How / why did the Individual come to School's notice in this instance?
- Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
- Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? If so, Where? When? How?
- Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
- Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?
- Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?
- Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider any extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.
- Please describe any other concerns you may have that are not mentioned here.

COMPLEX NEEDS - Is there anything in the Individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense? For example:

- Victim of crime, abuse or bullying.
- Work, financial or housing problems.
- Citizenship, asylum or immigration issues.
- Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings.
- On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency.
- Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
- Educational issues, developmental or behavioural difficulties, mental ill health (see Safeguarding Considerations below).
- Please describe any other need or potential vulnerability you think may be present

SAFEGUARDING CONSIDERATIONS for example:

- Does the Individual have any stated or diagnosed disabilities, disorders or mental health issues? If so, has this been diagnosed.
- Have you discussed this Individual with your organisations Safeguarding / Prevent lead? What was the result of the discussion?
- If your concerns as sufficient that you want to make a safeguarding referral, have you informed the Individual /parents that you are making this referral? If so, what was the response?
- Have you taken any direct action with the Individual since receiving this information? What was the action & the result?

- Have you discussed your concerns around the Individual with any other agencies?

OTHER INFORMATION you think may be relevant. For example: social media details, military service number, other agencies or professionals working with the Individual, etc…

https://www.gov.uk/government/policies/violence-against-women-and-girls

The government has a strategy looking at specific issues faced by women and girls. Within the context of this safeguarding policy the following sections are how we respond to violence against girls. Female genital mutilation, forced marriage, honour-based abuse and teenage relationship abuse all fall under this strategy.

Appendix 2 Other forms of harm, abuse and exploitation

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk. FGM is illegal in the UK.

On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. 'known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the DSL and/or head will be informed and that the member of teaching staff has called the police to report suspicion that FGM has happened.
At no time will staff examine pupils to confirm this.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other child protection concern.

While FGM has a specific definition, there are other abusive cultural practices which can be considered harmful to women and girls. Breast ironing is one of five UN defined 'forgotten crimes against women'. It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, and hammers to delay the appearance of puberty. This practice is considered to be abusive and should be referred to children's social care.

Virginity testing and hymenoplasty:

Staff should be aware that virginity testing and hymenoplasty became illegal in 2022 and that it is a criminal offence for anyone to perform or assist in the performance of FGM, virginity testing or hymenoplasty, in the UK or abroad, or to fail to protect a person under 16 for whom they are responsible. For cases where it is believed that a girl may be vulnerable to virginity testing or hymenoplasty, the staff will inform the DSL who will report it as with any other child protection concern.

Virginity testing is any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given.

Hymenoplasty is a procedure undertaken to reconstruct a hymen. The aim of the procedure is to ensure that a woman bleeds the next time she has intercourse to give the impression that she has no history of vaginal intercourse.

Forced Marriage

The age for marriage with consent is 18 years old in the United Kingdom. "It is an offence to cause a child under the age of 18 to enter a marriage in any circumstances, without the need to prove a form of coercion was used". (Ministry of Justice Gov.Uk February 2023)
In the case of children: 'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, *psychological, financial, sexual and emotional pressure.'* In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. are under 18.

It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care.
Policies and practices in this school reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to pupils who may be at risk of forced marriage, teachers and school leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

Characteristics that may indicate forced marriage**.**

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school/college, including truancy;
- a drop in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and students being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

Honour Based Abuse

Honour based abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For

example, honour-based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family
- Are exploring their sexuality or identity
- Women and girls are the most common victims of honour -based abuse however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:
- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go

Assault

All forms of honour-based abuse are abusive (regardless of the motivation) and should be handled and escalated as such. If staff believe that a pupil is at risk from honour based abuse, they will report to the DSL who will follow the usual safeguarding referral process; however, if it is clear that a crime has been committed or the pupil is at immediate risk, the police will be contacted in the first instance. It is important that, if honour-based abuse is known or suspected, communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

Teenage Relationship Abuse

Relationship abuse can take place at any age, and describes unacceptable behaviour between two people who are in a relationship. It can take place in relationships of any sexual orientation and the victim and abuser can be any sexual orientation.

Research has shown that teenagers do not understand what constitutes abusive behaviours and controlling behaviours which could escalate to physical abuse, e.g. checking someone's 'phone, telling them what to wear, who they can/can't see or speak to; or that this abuse is prevalent within teenage relationships. Further research shows that teenagers are likely not to understand what consent means within their relationships. They often hold the common misconception that rape could only be committed by a stranger down a dark alley and do not understand or recognise that it could happen within their own relationships.

This lack of understanding can lead to these abusive behaviours feeling 'normal' and therefore left unchallenged as they are not recognised as being abusive.

In response to these research findings the school will provide education to help prevent teenagers from becoming victims and perpetrators of abusive relationships, by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within their relationships.

Child on child abuse

We recognise that children are capable of abusing their peers, as referenced in School's Behaviour, Discipline, Sanctions and Exclusions Policy. In most instances the conduct of pupils towards each other will be covered by the Behaviour policy. Some allegations may be of such a serious nature that they may raise safeguarding concerns and these will be dealt with under this Safeguarding policy in line with Part 5 of KCSIE(2026). School may decide that the children involved do not require referral to statutory services but may benefit from early help to improve a family's resilience and outcomes or reduce the chance of a problem getting worse. Discriminatory behaviour, including racism and faith-targeted abuse constitute child on child abuse.

Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment between children is considered in a way so as to fit the age and development stage and understanding of the pupil group. Further information is given in the expectations set out in KCSIE 2026.

We recognise sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual assault is any unwanted sexual behaviour(Violence or harassment) that causes humiliation, pain, fear or intimidation.

Within our school all staff are made assured of compliance what sexual violence and sexual harassment might look like and what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. However, all child-on-child abuse will be treated seriously; we recognise that both boys and girls can be victims and it can be perpetrated by both boys and girls.

As a school we are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter', 'having a laugh' or 'boys being boys'. We adopt a zero- tolerance approach to any form of child -on -child abuse.

We will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos; sexual jokes, comments or taunting either in person or on social media; or on-line sexual harassment.

There is a clear procedure for how we deal with situations where sexual assaults or behaviour considered criminal between children has taken place.

As a school we will follow the "Sexual violence and sexual harassment between children in schools and colleges guidance" found in Part 5 of KCSIE 2026.

We will challenge all contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing bottoms, breasts or genitals, pinging or flicking bras, lifting skirts or pulling down trousers and impose appropriate levels of disciplinary action, to be clear that these behaviours are not tolerated or acceptable. We do not permit any form of initiation rites or 'hazing' at Twyford.
Support will be provided to victims of sexual violence and sexual harassment and we will ensure that they are kept safe.

Young people and adults can contact the NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
We will minimise the risk of child-on-child abuse by the following points:-

Prevention of sexual violence and sexual harassment:

- Taking a whole school approach to safeguarding and child protection
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.
- Adopting a ZERO TOLERANCE approach to child-on-child sexual abuse and harassment.
- Being vigilant for any signs of child-on-child sexual abuse and harassment and treating it seriously, whilst not dismissing it as 'banter' or an inevitable part of growing up.
- Recognising that peer-on-peer abuse is harmful sexual behaviour that must be addressed to help prevent problematic, abusive and/or violent behaviour in the future.
- Making staff aware that technology is a significant component in many safeguarding and well-being cases of child-on-child sexual harm and abuse. Children can abuse their peers online and this can take the form of abusive, harassing and misogynistic or misandrist messages, the non-consensual sharing of indecent images, especially around chat groups and the sharing of abusive images and pornography, to those who do not want to receive such content.
- Responding to reports of sexual violence and sexual harassment:
- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported. A victim will never be given the impression that they are causing a problem or made to feel ashamed when making their disclosure.
- If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.
- Staff taking the report will inform the DSL or their Deputy, as soon as practicably possible but at least within 25 hours.
- Staff taking a report will never promise confidentiality.
- Staff taking a report should be mindful that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care (01329 225379).
- Young people and adults can contact the NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk
- All staff will maintain the attitude that "It could happen here."

Risk Assessment for sexual violence and sexual harassment:

Following a report, the DSL will make an immediate risk and needs assessment on a case-by case basis. See Sexual Violence and Sexual Harassment between Children Risk and Needs Assessment Template.

The Risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- Time and location of the incident.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.
- Actions required to make the location safer

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

Action: The DSL will never promise confidentiality or anonymity and will consider:

- The wishes of the victim balanced with duty to protect the victim and other children.
- The nature of the incident, including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks pattern, or one off.
- The impact on any siblings- intrafamilial harms must not be underestimated
- Other related issues or wider context.

Options: The DSL will normally inform the parents and manage the report with the following options:

- Manage internally
- Early Help, engage staff and agencies who are required to support the children involved and/or be involved in any investigation
- Refer to Children's Social Care
- Report to the police (generally in parallel with a referral to Social Care)

Ongoing Response:

The DSL will manage each report on a case, by case basis and will keep the risk assessment under review.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and other witnesses (children& adults) will receive appropriate support and safeguards on a case-by-case basis.
The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in schools.

The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Physical Abuse between peers

While a clear focus of peer -on -peer abuse is around sexual abuse and harassment, physical assaults and initiation rituals, online activity and/or violence from pupils to pupils can also be abusive.
These are equally not tolerated at Twyford School and will be treated both as a safeguarding matter and will give rise to disciplinary action. If it is believed that a crime has been committed, it will be reported to the police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority. An appropriate adult will accompany the child during any police enquiries.

Sexual Violence and Sexual Harassment between Children- Risk and Needs Assessment Template
(This template is offered as a framework and should be seen as a starting point for development to fit our school's individual context. Each reported incident should be managed on a case-by-case basis). Was it a crime? Was it face to face or online?

EXAMPLE assessment

Time: Location of incident: Behaviours by perpetrator Brook Traffic Light Assessment	What are the continued risks? Who might be harmed & how?	Actions to make location safer, reduce likelihood reduce behaviour risk	Action by Whom?	Action by when?	Action status /Date Completed & Outcome including further actions
Red Behaviours:					

Time: Location of incident: Behaviours by perpetrator Brook Traffic Light Assessment	What are the continued risks? Who might be harmed & how?	Actions to make location safer, reduce likelihood reduce behaviour risk	Action by Whom?	Action by when?	Action status /Date Completed & Outcome including further actions

Brook sexual behaviours traffic light tool
Mr Tom Parsons, DSL, has completed the training in the use of the Brook Traffic Light Tool in 2026.

Behaviours: age 0 to 5
All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?
Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?
Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours
holding or playing with own genitals
attempting to touch or curiosity about other children's genitals
attempting to touch or curiosity about breasts, bottoms or genitals of adults
games e.g. mummies and daddies,
doctors and nurses
enjoying nakedness
interest in body parts and what they do
curiosity about the differences between boys and girls
What is an amber behaviour?
Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be
of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?
Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours
preoccupation with adult sexual
behaviour
pulling other children's pants down/skirts up/trousers down against their will
talking about sex using adult slang

preoccupation with touching the genitals of other people
following others into toilets or changing rooms to look at them or touch them
talking about sexual activities seen on TV/online

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving

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significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

persistently touching the genitals of other children
persistent attempts to touch the genitals of adults
simulation of sexual activity in play
sexual behaviour between young children involving penetration with objects
forcing other children to engage in sexual play

This is intended to be used as a guide only. Please refer to the guidance at https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool for further information.

Behaviours: age 5 to 9 and 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?
Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?
Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours 5-9
feeling and touching own genitals
curiosity about other children's genitals
curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
sense of privacy about bodies
telling stories or asking questions using swear and slang words for parts of the body

Green behaviours 9-13
solitary masturbation
use of sexual language including swear and slang words
having girl/boyfriends who are of the same, opposite or any gender
interest in popular culture, e.g. fashion, music, media, online games, chatting online
need for privacy
consensual kissing, hugging, holding hands with peers

What is an amber behaviour?
Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be
of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?
Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours 5-9
questions about sexual activity which persist or are repeated frequently, despite an answer having been given
sexual bullying face to face or through texts or online messaging
engaging in mutual masturbation
persistent sexual images and ideas in talk, play and art
use of adult slang language to discuss sex
Amber behaviours 9-13
uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
verbal, physical or cyber/virtual sexual bullying involving sexual aggression
LGBT (lesbian, gay, bisexual, transgender) targeted bullying
exhibitionism, e.g. flashing or mooning
giving out contact details online
viewing pornographic material
worrying about being pregnant or having STIs

What is a red behaviour?
Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?
Red behaviours indicate a need for
immediate intervention and action.

Red behaviours 5-9
frequent masturbation in front of others
sexual behaviour engaging significantly younger or less able children
forcing other children to take part in
sexual activities
simulation of oral or penetrative sex

sourcing pornographic material online
Red behaviours 9-13
exposing genitals or masturbating in public
distributing naked or sexually provocative images of self or others

sexually explicit talk with younger children
sexual harassment
arranging to meet with an online acquaintance in secret
genital injury to self or others

forcing other children of same age, younger or less able to take part in sexual activities
sexual activity e.g. oral sex or intercourse
presence of sexually transmitted infection (STI)
evidence of pregnancy

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Behaviours: age 13 to 17
All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?
Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?
Green behaviours provide opportunities to give positive feedback and additional information.
Green behaviours
solitary masturbation
sexually explicit conversations with peers
obscenities and jokes within the current cultural norm
interest in erotica/pornography
use of internet/e-media to chat online
having sexual or non-sexual relationships
sexual activity including hugging, kissing, holding hands
consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
choosing not to be sexually active

What is an amber behaviour?
Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be
of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?
Amber behaviours signal the need to take notice and gather information to assess the appropriate action.
Amber behaviours
accessing exploitative or violent pornography
uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
concern about body image
taking and sending naked or sexually provocative images of self or others
single occurrence of peeping, exposing, mooning or obscene gestures
giving out contact details online
joining adult- only social networking sites and giving false personal information
arranging a face to face meeting with an online contact alone

What is a red behaviour?
Red behaviours are outside of safe and healthy behaviour. They may be
excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?
Red behaviours indicate a need for
immediate intervention and action.
Red behaviours
exposing genitals or masturbating in public
preoccupation with sex, which interferes with daily function
sexual degradation/humiliation of self or others
attempting/forcing others to expose genitals
sexually aggressive/exploitative behaviour

sexually explicit talk with younger children
sexual harassment
non-consensual sexual activity
use of/acceptance of power and control in sexual relationships
genital injury to self or others
sexual contact with others where there
is a big difference in age or ability
sexual activity with someone in authority and in a position of trust
sexual activity with family members
involvement in sexual exploitation and/or trafficking
sexual contact with animals
receipt of gifts or money in exchange for sex.

Sexism and stereotyping

The new RSHE Guidance (July 2025) Relationships Education, Relationships and Sex Education and Health Education guidance outlines the importance of developing positive concepts of masculinity and femininity.

Both within and beyond the classroom, staff should be conscious of everyday sexism, misogyny, homophobia and stereotypes, and should take action to build a culture where prejudice is identified and tackled. Staff have an important role in modelling positive behaviour and avoiding language that might perpetuate harmful stereotypes. Pupils should understand the importance of challenging harmful beliefs and attitudes and should understand the links between sexism and misogyny and violence against women and girls. Where misogynistic ideas are expressed at school, staff should challenge the ideas, rather than the person expressing them.

Pupils may be exposed to online content which normalises harmful or violent sexual behaviours, which might include sexist and misogynistic influencers who normalise sexual harassment and abuse. Young people may be more vulnerable to this content when they have low self-esteem, are being bullied, or have other challenges in their lives. Teachers should encourage pupils to consider how this content may be harmful to both men and women, while avoiding stigmatising or perpetuating harmful stereotypes about boys, and avoiding directly signposting to specific content and content producers.

Upskirting

In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal. Although we do not permit pupils to have mobile phones at school, and only digital cameras with express permission, we must ensure we are alert to the possibility that this could happen here.

Upskirting is defined as someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. If this is between pupils, we will follow the child-on-child abuse procedure.

If staff in the school are made aware that upskirting has occurred, then this will be treated as a sexual offence and reported accordingly. It is a safeguarding concern and must be reported to the DSL immediately.

There are behaviours that would be considered as sexual harassment which may be pre-cursors to upskirting. The use of reflective surfaces or mirrors to view underwear or genitals will not be tolerated and the school will respond to these with appropriate disciplinary action and education.

Pupils who place themselves in positions that could allow them to view underwear, genitals or buttocks, will be moved given appropriate guidance about their behaviour. Parents may be informed. Repeat offenders will be disciplined. These locations could include stairwells, under upper floor walkways, outside changing areas and toilets or sitting on the floor or laying down in corridors.

If technology that is designed for covert placement and could be used to take upskirting or indecent images is discovered in the School it will be confiscated. If the technology is in location and

potentially may have captured images, this will be reported to the police and left in situ so that appropriate forensic measures can be taken to gather evidence.

Any confiscated technology will be passed to the head teacher to make a decision about what happens to the items and will be carried out under the principles set out in the government guidance on searching, screening and confiscation https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf

If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed.

The Trigger Trio

The term 'Trigger Trio' has replaced the previous phrase 'Toxic Trio' which was used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to women and children has occurred.

The above are viewed as indicators of increased risk of harm to children and young people. In an analysis of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the issues were present.

These factors will have a contextual impact on the safeguarding of children and young people.

Domestic Abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive or 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. This can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Research indicates that living within a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of what constitutes a normal relationship.

Children witnessing domestic abuse is recognised as 'significant harm' in law. These children may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential. They may also blame themselves for the domestic abuse.

Indicators that a child is living within a relationship with domestic abuse may include:

- being withdrawn
- suddenly behaving differently
- anxiety
- being clingy
- depression
- aggression
- problems sleeping
- eating disorders
- bed wetting
- soiling clothes
- excessive risk taking
- missing school
- changes in eating habits
- obsessive behaviour
- experiencing nightmares
- taking drugs
- use of alcohol
- self-harm
- thoughts about suicide

These behaviours themselves do not indicate that a child is living with domestic abuse, but should be considered as indicators that this may be the case.

If staff believe that a child is living with domestic abuse, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.
Adverse childhood experiences (ACEs)such as witnessing, suffering abuse or neglect can have a lasting impact throughout childhood, adolescence and into adulthood. More information on mental health can be found later in this policy and in "Mental health and behaviour school guidance".

Parent mental ill health

The term 'mental ill health' is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children the impact of parental mental health can include:

- The parent / carer's needs or illnesses taking precedence over the child's needs
- Child's physical and emotional needs neglected
- A child acting as a young carer for a parent or a sibling
- Child having restricted social and recreational activities
- Child finds it difficult to concentrate- impacting on educational achievement

- A child missing school regularly as (s)he is being kept home as a companion for a parent / carer
- A child adopts paranoid or suspicious behaviour as they believe their parent's delusions.
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child

If staff become assured of compliance any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the School's mental health lead and the DSL to consider a referral to children's social care.

Parental substance misuse

Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For children the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour
- Bullying (including due to poor physical appearance)
- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration
- Child talking of or bringing into school drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role
- Continued poor academic performance including difficulties completing homework on time
- Poor attendance or late arrival.

These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to be considered for children's social care.

Missing, Exploited and Trafficked Children (MET)

Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or being exploited; or who are at risk of or are being trafficked. Given the close links between all of these issues, there has been a considered response to join all these issues, so that cross over of risk is not missed.

Children Absent from Education

Patterns of children absent from education can be an indicator of either abuse or safeguarding risks. Absences will be followed up in a timely manner. A relatively short length of time a child is absent does not reduce risk of harm to that child, and all absence or non-attendance, including unexplainable or persistent absences from education, should be considered with other known factors or concerns.

DSLs and staff should consider:

- Missing lessons: Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the school site or are they absent from the site?
- Is the child being exploited during this time?
- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other pupils routinely missing the same lessons and does this raise other risks or concerns?
- Is the lesson being missed one that would cause bruising or injuries to become visible?
- Single absent days: Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing the school of the absence on the day? Are absent days reported back to parents to confirm their awareness?
- Is the child being sexually exploited during this day?
- Do the parents appear to be aware and are they condoning the behaviour?
- Are the pupil's peers making comments or suggestions as to where the pupil is at?
- Can the parent be contacted and made aware?
- Continuous absent days: Has the school been able to make contact with the parent? Is medical evidence being provided? Are siblings attending school (either our or local schools)?
- Did we have any concerns about radicalisation, FGM, forced marriage, honour based violence, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?
- Does the parent have any known medical needs? Is the child safe?

The school will view absence as both a safeguarding and an educational outcomes issue. The school may take steps that could result in legal action for attendance, or a referral to children's social care, or both.

Children Missing from Home or Care

It is known that children who go missing are at risk of suffering significant harm, and there are specific risks around children running away and the risk of sexual exploitation.
The Hampshire Police Force, as the lead agency for investigating and finding missing children, will respond to children going missing based on on-going risk assessments in line with current guidance.

The police definition of 'missing' is: "Anyone whose whereabouts cannot be established will be considered as missing until located, and their well-being or otherwise confirmed."

Various categories of risk should be considered and Hampshire Local Safeguarding Children's Partnership provides further guidance:

Local authorities have safeguarding duties in relation to children missing from home and should work with the police to risk assess and analyse data for patterns that indicate particular concerns and risks.

The police will prioritise all incidents of missing children as medium or high risk. Where a child is recorded as being absent, the details will be recorded by the police, who will also agree review times and any on-going actions with person reporting.
A missing child incident would be prioritised as 'high risk' where:

- the risk posed is immediate and there are substantial grounds for believing that the child is in danger through their own vulnerability; or
- the child may have been the victim of a serious crime; or
- the risk posed is immediate and there are substantial grounds for believing that the public is in danger.

The high-risk category requires the immediate deployment of police resources.

Authorities need to be alert to the risk of sexual exploitation or involvement in drugs, gangs or criminal activity, trafficking and assured of compliance local "hot spots" as well as concerns about any individuals with whom children runaway.
Child protection procedures must be initiated in collaboration with children's social care services whenever there are concerns that a child who is missing may be suffering, or likely to suffer, significant harm.
Within any case of children who are missing both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Trigger Trio

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum-seeking children, there will be pressure to make contact with their trafficker.

We will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unassured of compliance the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them or do so ourselves with urgency.

Children who run away from home or from care, provide a clear behavioural indication that they are either unhappy or do not feel safe in the place of residence.

Research shows that children run away from conflict or problems at home or school, neglect or abuse, or because children are being groomed by predatory individuals who seek to exploit them. Many run away on numerous occasions.

The Association of Chief Police Officers has provided the following definitions and guidance:- "Missing person is: 'Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another.'

An absent person is: 'A person not at a place where they are expected or required to be.'

All cases classified as 'missing' by the police will receive an active police response – such as deployment of police officers to locate a child. Cases where the child was classified as 'absent' will be recorded by the police and risk assessed regularly but no active response will be deployed. The absent case will be resolved when a young person returns or new information comes to light suggesting that he/she is at risk. In the latter instance, the case is upgraded to 'missing'.

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: **www.actionagainstabduction.org** and www.clevernevergoes.org.

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. CSE can affect any child or young person under the age of 18 years. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media) (*Definition from KCSiE 2020)*

- Exploitation can be isolated (one-on-one) or organised group/criminal activity
- There can be a big age gap between victim and perpetrator, but it can also be child-on-child
- Boys can be targeted just as easily as girls – this is not gender specific
- Perpetrators can be women and not just men
- Exploitation can be between males and females or between the same genders
- Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular groups, e.g. looked after children, young carers, children who have a

history of physical, sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or school, children involved in crime, children with parents/carers who have mental health problems, learning difficulties/other issues, children who associate with other children involved in exploitation. However, it is important to recognise that any child can be targeted.

Indicators a child may be at risk of CSE include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections or becomes pregnant;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim.

As a school we educate all staff in the signs and indicators of sexual exploitation. We use the sexual exploitation risk assessment form (CERAF) and associated guidance to identify pupils who are at risk and the DSL will share this information as appropriate with children's social care.

We recognise that we may have information or intelligence that could be used to both protect children and prevent risk. The School will monitor developments relating to statutory mandatory reporting duties and will update procedures immediately when Government implementation guidance is issued. Any relevant information that we have will be shared on the community partnership information (CPI) form which can be downloaded from https://www.safe4me.co.uk/portfolio/sharing-information/

Child Criminal Exploitation (CCE including county lines)

Child criminal exploitation is recognised as a form of child abuse.
Child Criminal Exploitation is defined as:- 'where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can occur through the use of technology'

The exploitation of children and young people for crime is not a new phenomenon as evidenced by Fagan's gang in Charles Dickens book, Oliver Twist. Children under the age of criminal responsibility, or young people who have increased vulnerability due to push: pull factors who are manipulated, coerced or forced into criminal activity provide opportunity for criminals to distance themselves from crime.

A current trend in criminal exploitation of children and young people are 'county lines' which refer to a 'phone line through which drug deals can be made. An order is placed on the number and

typically a young person will deliver the drugs to the specified address and collect the money for the deal. These lines are owned and managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas. Children are often recruited to move drugs and money between locations and are known to be exposed to such techniques as “plugging” where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation, as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Indicators that a child may be criminally exploited include:

- Increase in Missing episodes – particular key as children can be missing for days and drug run in other Counties
- Having unexplained amounts of money, new high cost items and multiple mobile phones
- Increased social media and phone/text use, almost always secretly
- Older males in particular seen to be hanging around and driving
- Having injuries that are unexplained and unwilling to be looked at
- Increase in aggression, violence and fighting
- Carrying weapons – knives, baseball bats, hammers, acid
- Travel receipts that are unexplained
- Association with other young people involved in exploitation
- Significant missing from education and disengaging from previous positive peer groups
- Children who misuse drugs and alcohol
- Parent concerns and significant changes in behaviour that affect emotional wellbeing

We will treat any child who may be criminally exploited as a victim and using the CERAF form and guidance in our referral to children’s social care (New version of the Child Exploitation Risk Assessment Framework (CERAF) - Hampshire SCP). We recognise boys and girls experience may be very different. If a referral to the police is also required as crimes have been committed on the school premises, these will also be made.

If there is information or intelligence about child criminal exploitation, we will report this to the police via the community partnership information form.
https://www.safe4me.co.uk/portfolio/sharing-information/

Any pupil found in possession of a knife or offensive weapon will be considered both a safeguarding concern and a potential criminal matter. The School will undertake a safeguarding risk assessment and involve the Police, Children's Social Care and other relevant agencies where appropriate.

The School will have due regard to current Home Office guidance relating to children found in possession of knives or offensive weapons and will work collaboratively with Police, Youth Justice Services and safeguarding partners.

Serious Violence

Serious violence is becoming a factor for those who are involved in criminal exploitation. It can also be an indication of gang involvement and criminal activity.

All staff will be made assured of compliance indicators, which may signal that pupils, or members of their families, are at risk from or involved with serious violent crime.

These indications can include but are not limited to: increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm; significant change in wellbeing; signs of assault; unexplained injuries; unexplained gifts and/or new possessions; possession of weapons.

As a school we have a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions.
We will report concerns of serious violence to police and social care.

If there is information or intelligence about potential serious violence, we will report this to the police via the community partnership information form.
https://www.safe4me.co.uk/portfolio/sharing-information/

Trafficked Children and modern slavery

Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:
Movement (including within the UK);
Control, through harm / threat of harm or fraud For the purpose of exploitation

Any child transported for exploitative reasons is considered to be a trafficking victim.
There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.
There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history with missing links and unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported.

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in

- sexual exploitation / the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy / disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child or young person has no known links;
- Possible inappropriate use of the internet and forming on-line relationships, particularly with adults

These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.
When considering modern slavery, there is a perception that this is taking place overseas. The government estimates that tens of thousands of slaves are in the UK today.

Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

If staff believe that a child is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.
Further information on the signs that someone may be a victim to modern slavery and how to refer them to the national referral mechanism can be found in Guidance Modern slavery: how to identify and support victims-GOV.UK

Appendix 3– Safeguarding issues relating to individual pupil needs

Homelessness

As a school we recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The impact of losing a place of safety and security can affect a child's behaviour and attachments.

In line with the Homelessness Reduction Act 2017 this school will promote links into the Local Housing Authority for the parent or care giver in order to raise/progress concerns at the earliest opportunity.

We recognises that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Children & the Court System

As a school we recognise that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a stressful experience and therefore the school will aim to support children through this process.

Along with pastoral support, the school will use age-appropriate materials published by HM Courts and Tribunals Services (2017) that explain to children what it means to be a witness, how to give evidence and the help they can access.

We recognise that making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. This school will support children going through this process.

Alongside pastoral support this school will use online materials published by The Ministry of Justice (2018) which offers children information & advice on the dispute resolution service. There are two age- appropriate guides to support children 5-11 (HM Courts and Tribunals Service 2017a) and 12-17 year olds (HM Courts and Tribunals Service 2017b). The guides explain each step of the process and special measures that are available.

These materials will also be offered to parents and carers if appropriate.

Children with family members in prison

Children who have a family member in prison are at greater risk of poor outcomes including poverty, stigma, isolation and poor mental health.

This school aims to:-

- Understand and Respect the Child's Wishes
  We will respect the child's wishes about sharing information. If other children become aware the school will be vigilante to potential bullying or harassment

- Keep as Much Contact as Possible with the Parent and Caregiver
  We will maintain good links with the remaining caregiver in order to foresee and manage any developing problems. Following discussions we will develop appropriate systems for keeping the imprisoned caregiver updates about their child's education.

- Be Sensitive in Lessons

This school will consider the needs of any child with an imprisoned parent during lesson planning.

- Provide Extra Support

We recognise that having a parent in prison can attach a real stigma to a child, particularly if the crime is known and particularly serious. We will provide support and mentoring to help a child work through their feelings on the issue.

Alongside pastoral care the school will use the resources provided by the National Information Centre on Children of Offender in order to support and mentor children in these circumstances.

Pupils with medical conditions (in school)

See Twyford School Medical Protocol.

As a school we will make sure that sufficient staff are trained to support any pupil with a medical condition.
All relevant staff will be made assured of compliance the condition to support the child and be assured of compliance medical needs and risks to the child.
An individual healthcare plan may be put in place to support the child and their medical needs.

Pupils with medical conditions (out of school)

There will be occasions when children are temporarily unable to attend our school on a full-time basis because of their medical needs. These children and young people are likely to be:
children and young people suffering from long-term illnesses
children and young people with long-term post-operative or post-injury recovery periods
children and young people with long-term mental health problems (emotionally vulnerable).

Where it is clear that an absence will be for more than 15 continuous school days the Education and Inclusion branch of Children Services will be contacted to support with the pupil's education.

Special educational needs and disabilities (SEND)

Children who have special educational needs and/or disabilities can have additional vulnerabilities when recognising abuse and neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- Have fewer outside contacts than other children
- Receive intimate care from a considerable number of carers, which may increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries
- Have an impaired capacity to resist or avoid abuse

- Have communication difficulties that may make it difficult to tell others what is happening
- Be inhibited about complaining for fear of losing services
- Be especially vulnerable to bullying and intimidation
- Be more vulnerable than other children to abuse by their peers.

As a school we will respond to this by:

- Making it common practice to enable disabled children to make their wishes and feelings known in respect of their care and treatment
- Ensuring that disabled children receive appropriate personal, health and social education (including sex education)
- Making sure that all disabled children know how to raise concerns and give them access to a range of adults with whom they can communicate. This could mean using interpreters and facilitators who are skilled in using the child's preferred method of communication
- Recognising and utilising key sources of support including staff in schools, friends and family members where appropriate
- Developing the safe support services that families want, and a culture of openness and joint working with parents and carers on the part of services
- Ensuring that guidance on good practice is in place and being followed in relation to: intimate care; working with children of the opposite sex; managing behaviour that challenges families and services; issues around consent to treatment; anti-bullying and inclusion strategies; sexuality and safe sexual behaviour among young people; monitoring and challenging placement arrangements for young people living away from home.

The Special Educational Needs and Disabilities Information and Support Service (SENDIASS) Mencap and NSPCC all offer specific advice.

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

Caution is necessary for children questioning their gender as there are unknown impacts of social transition and children may well have wider vulnerabilities, including having complex mental health and psychological needs. Families will be encouraged when making decisions about support for gender questioning children, to seek early clinical help and advice by professionals with relevant experience. Twyford School will work in partnership with a child's parents to consider the broad range of individual needs and cautiously seek clinical advice on how to address wider vulnerabilities such as the risk of bullying. We shall refer to DfE guidance for Schools and Colleges on RSHE and Gender Questioning children.

Intimate and personal care

'Intimate Care' can be defined as care tasks of an intimate nature, associated with bodily functions, bodily products and personal hygiene, which demand direct or indirect contact with, or exposure of, the sexual parts of the body. The Intimate Care tasks specifically identified as relevant include:

- Dressing and undressing (underwear)
- Helping someone use the toilet
- Changing continence pads (faeces/urine)
- Bathing / showering
- Washing intimate parts of the body
- Changing sanitary wear
- Inserting suppositories

- Giving enemas
- Inserting and monitoring pessaries.
- Attending to an intimate injury

'Personal Care' involves touching another person, although the nature of this touching is more socially acceptable. These tasks do not invade conventional personal, private or social space to the same extent as Intimate Care. Those Personal Care tasks specifically identified as relevant here include:

- Skin care/applying external medication
- Feeding
- Administering oral medication
- Hair care
- Dressing and undressing (clothing)
- Washing non-intimate body parts
- Prompting to go to the toilet.

Personal Care encompasses those areas of physical and medical care that most people carry out for themselves but which some are unable to do because of disability or medical need. Children and young people may require help with eating, drinking, washing, dressing and toileting.

Where Intimate Care is required we will follow the following principles:

Involve the child in the intimate care

Try to encourage a child's independence as far as possible in his or her intimate care. Where a situation renders a child fully dependent, talk about what is going to be done and give choices where possible. Check your practice by asking the child or parent about any preferences while carrying out the intimate care.

Treat every child with dignity, respect and ensure privacy is considered and appropriate to the child's age, situation and balanced with safeguarding and support needs.

Staff should administer intimate care with another adult present; we are assured of compliance the potential safeguarding issues for the child and member of staff.

In the event of a pupil sustaining an injury to an intimate area of their body, staff are to ensure that if urgent care is required, the privacy and dignity of the pupil are maintained at all times. Where possible, a pupil should be encouraged to administer their own care, however, if this is not possible then two members of staff should be present. Whether an injury to an intimate area is deemed major, or minor, contact should be made with a parent as soon as possible.

First Aid for Intimate Care:

In the event of a First Aid intimate care emergency, First Aid treatment should be administered immediately. Where an immediate response is not required, the parents should be contacted straightaway to update them of the situation and to inform them of the treatment procedure. When administering First Aid intimate care, two staff members should be present. Where possible, the child's permission should be sought and, where possible, the parent should be called first to ask for their permission to administer First Aid intimate care, and to update them on the situation. The full process should be documented on both CPOMS and iSAMS. The parent(s) should be emailed to provide a further written record that the correct procedures have been followed.

Taking Photographs of pupil injuries (intimate or general):

If Photographic evidence is needed for medical purposes, photos of any injuries should be taken on the school iPad with permission from the child and parent. Any pictures must not identify the child or in any way contravene child protection protocols.

Be assured of compliance your own limitations

Only carry out activities you understand and with which you feel competent. If in doubt, ASK. Some procedures must only be carried out by members of staff who have been formally trained and assessed.

Promote positive self-esteem and body image

Confident, self-assured children who feel their body belongs to them are less vulnerable to sexual abuse. The approach you take to intimate care can convey lots of messages to a child about their body worth. Your attitude to a child's intimate care is important. Keeping in mind the child's age, routine care can be both efficient and relaxed.

If you have any concerns you must report them.

If you observe any unusual markings, discoloration or swelling, report it immediately to the designated practitioner for child protection.

If a child is accidentally hurt during the intimate care or misunderstands or misinterprets something, reassure the child, ensure their safety and report the incident immediately to the DSL. Report and record any unusual emotional or behavioural response by the child. A written record of concerns must be made available to parents and kept in the child's child protection record.

Helping through communication

There is careful communication with each child who needs help with intimate care in line with their preferred means of communication (verbal, symbolic, etc.) to discuss the child's needs and preferences. The child is assured of compliance each procedure that is carried out and the reasons for it.

Support to achieve the highest level of autonomy

As a basic principle children will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each child to do as much for themselves as

they can. This may mean, for example, giving the child responsibility for washing themselves. Individual intimate care plans will be drawn up for particular children as appropriate to suit the circumstances of the child. These plans include a full risk assessment to address issues such as moving and handling, personal safety of the child and the carer and health.

Fabricated or induced illness

There are three main ways that a carer could fabricate or induce illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents
- induction of illness by a variety of means.

If we are concerned that a child may be suffering from fabricated or induced illness we will inform children's social care.

Mental Health

Miss Pippa Higham is the school's pupil designated Wellbeing Lead. She oversees the help the school gives to children with mental health difficulties, as well as guiding staff in identifying children who are exhibiting signs of mental health problems. Miss Higham offers advice to staff about Mental Health and, in conjunction with the DSL, will refer children to specialist services where appropriate. The HR manager, Mrs Vanessa Chapman, offers advice to staff about Mental Health.

Form tutors and class teachers see their pupils, day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of pupils. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Mental health concerns about a child are also safeguarding concerns and therefore if a member of staff has a concern about a child's metal health, they should follow the same procedure as for a safeguarding concern.

The balance between the risk and protective factors are most likely to be disrupted when difficult events happen in pupils' lives. These include:

- **loss or separation** – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted
- **life changes** – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school, or secondary school to sixth form
- **traumatic events** such as abuse, domestic violence, bullying, violence, accidents, injuries or natural disaster.

When concerns are identified, school staff will provide opportunities for the child to talk or receive support within the school environment. Parents will be informed of the concerns and a shared way to support the child will be discussed.

Where the needs require additional professional support referrals will be made to the appropriate team or service with the parent's agreement or child's if they are considered to be competent.
If staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action, raising the issue with the Wellbeing Lead and/or the Designated Safeguarding lead or a deputy.

Appendix 4 – Other safeguarding issues that may potentially have an impact on pupils

Bullying

The school has a separate anti bullying policy that should be read in conjunction with this policy.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Prejudice based abuse

Prejudice based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a person's real or perceived:

- Disability
- Race
- Religion
- Gender identity
- Sexual orientation

Although this sort of crime is collectively known as 'Hate Crime' the offender doesn't have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.

This can be evidenced by:

- threatened or actual physical assault
- derogatory name calling, insults, for example racist jokes or homophobic language
- hate graffiti (e.g. on school furniture, walls or books)
- provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations
- distributing literature that may be offensive in relation to a protected characteristic
- verbal abuse
- inciting hatred or bullying against pupils who share a protected characteristic
- prejudiced or hostile comments in the course of discussions within lessons
- teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background
- refusal to co-operate with others because of their protected characteristic, whether real or perceived

- expressions of prejudice calculated to offend or influence the behaviour of others
- attempts to recruit other pupils to organisations and groups that sanction violence, terrorism or hatred.

As a school we will respond by:

- clearly identifying prejudice based incidents and hate crimes and monitor the frequency and nature of them within the school
- taking preventative action to reduce the likelihood of such incidents occurring
- recognising the wider implications of such incidents for the school and local community
- providing regular reports of these incidents to the Governing Body
- ensuring that staff are familiar with formal procedures for recording and dealing with prejudice based incidents and hate crimes
- dealing with perpetrators of prejudice based abuse effectively
- supporting victims of prejudice based incidents and hate crimes
- ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again.

Drugs and substance misuse

See Twyford School Policy on Smoking, Drugs and Alcohol

Faith Abuse

The number of known cases of child abuse linked to accusations of 'possession' or 'witchcraft' is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem.
Such abuse generally occurs when a carer views a child as being 'different', attributes this difference to the child being 'possessed' or involved in 'witchcraft' and attempts to exorcise him or her.

A child could be viewed as 'different' for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the carer and the child.

There are various social reasons that make a child more vulnerable to an accusation of 'possession' or 'witchcraft'. These include family stress and/or a change in the family structure.

The attempt to 'exorcise' may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.

If the school becomes assured of compliance a child who is being abused in this context, the DSL will follow the normal referral route into children's social care.

Gangs and Youth Violence

The vast majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact.

As a school we have a duty and a responsibility to protect our pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While pupils generally see educational establishments as safe

places, even low levels of youth violence can have a disproportionate impact on any education.

Primary schools are also increasingly recognised as places where early warning signs that younger children may be at risk of getting involved in gangs can be spotted. Crucial preventive work can be done within school to prevent negative behaviour from escalating and becoming entrenched.

As a school we will:

- develop skills and knowledge to resolve conflict as part of the curriculum
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour
- understand risks for specific groups, including those that are gender-based, and target interventions
- safeguard, and specifically organise child protection, when needed
- make referrals to appropriate external agencies
- carefully manage individual transitions between educational establishments especially into Pupil Referral Units (PRUs) or alternative provision
- work with local partners to prevent anti-social behaviour or crime.

Private fostering

Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.

The Law requires that the carers and parents must notify the Children's Services Department of any private fostering arrangement.

If the school becomes aware that a pupil is being privately fostered we will inform the Children's Services Department and inform both the parents and carers that we have done so.

Parenting challenging behaviour

All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it makes them human and provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren).

Some children have medical conditions and/or needs e.g. Tourette's Syndrome, some conditions associated with autism or ADHD that have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.

In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place.

As a school we will support parents in understanding the parenting role and provide them with strategies to make a difference by:

- providing details of community based parenting courses
- linking to web based parenting resources (for example
- referring to the school parenting worker/home school link worker (where available)
- discussing the issue with the parent and supporting them in making their own plans of how to respond differently (using evidence based parenting programmes)
- considering appropriate early help services.

Appendix 5 - Safeguarding processes

Boarding procedures

As a flexi-boarding School that offers weekly boarding, boarding and the wider pastoral staff should be assured of compliance the possibility of child-on-child abuse between boarding pupils, especially where there are pupils across a wide age range ,who have the opportunity to interact socially and possibly in private. Staff who have concerns should raise this with the Head of Boarding (who is a Deputy DSL) or one of his deputies and the DSL or a Deputy DSL as appropriate.

All sections of this addendum to the Safeguarding Policy apply to boarders & boarding staff during boarding hours.
Twyford School recognises that boarders have specific Child Protection and Safeguarding needs during boarding hours.

The boarding staff are committed to meeting these needs primarily by taking actions, under the guidance of the Head of Boarding, to enable all boarders to have the best outcomes. The wellbeing of boarders underpins and informs all decisions and actions taken within the hours of boarding.
To this effect the boarding staff are committed to meeting these needs by;

- being able to ascertain the whereabouts of all boarders during boarding hours
- carrying out registrations at the specified times and follow the missing pupil procedure if needed
- communicating with the medical room about medical issues or concerns
- reporting pastoral concerns on CPOMS
- following procedures and protocols detailed in The School's policies
- following medical and or welfare plans written by the matrons and/or the Hub staff
- considering specific boarding needs such as homesickness, transitions between home and boarding, the need to communicate home, the need to be alone, and the need to talk to somebody such as boarding staff member, a boarding prefect, the Boarding Matron, the Chaplain, the School Listener or the Independent Listener
- following the Fire Evacuation Procedure

Alternative provision

If the school commissions a place for a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will undertake all checks and ensure that the placement meets the pupil's needs. Check would include, for example, suitability of provision and provision type, safeguarding, health and safety, arrangements for attendance and reporting progress, and information sharing.

The school will follow the statutory guidance for commissioning Alternative Provision:
Education for children with health needs who cannot attend school - GOV.UK
Alternative provision - GOV.UK
Keeping children safe in education 2025
Hampshire County Council Alternative Provision Guidance June 2025

Appendix 6 - Briefing sheet for temporary contractors and supply staff

While working **at Twyford School**, you have a duty of care towards the children/pupils/students on the school site. This means that at all times, you should act in a way that is consistent with their safety and welfare.

In addition, **if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL)**, who is ***Mr Tom Parsons*** and can contacted by phone on 07904635770, 01962 779825 and email: sjohnston@twyfordschool.com

You may have become concerned as a result of:
Observing a physical injury, which you think may have been non-accidental
Observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
Observing behaviour that leads you to be concerned about a child or young person
A child or young person telling you that they have been subjected to some form of abuse
Being made aware that a child is being abused by another child (peer on peer abuse)

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the **DSL** as soon as possible and no later than 25 hours. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:
Rather than directly questioning the child, just listen and be supportive
Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect
Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it and give your record to the **DSL** who will contact Children's Social Care if appropriate

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, in **the School Office.**

If you believe an adult has behaved inappropriately towards a child or children, you must report this to the Headmaster, Mr Andrew Harvey, as soon as possible, certainly no later than 25 hours. He can be contacted on 07468 455864 (25 hours) or by email: headmaster@twyfordschool.com. If your concern involves the DSL or a member of the senior staff, contact the LADO on 01962 847364 or via Hampshire LADO Enquiry Form sent to LADO@hants.gov.uk.

Concerns could include:-

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence of, children
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such
- Behaving towards a child an any way that could indicate he or she would pose a risk of harm to children

- Low level safeguarding concerns

Low level concern does not mean it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. A low-level concern is ANY concern, no matter how small, and even if no more than causing a sense of unease or a nagging doubt, that an adult working in or on behalf of Twyford School, may have acted in a way that:

- Is inconsistent with Staff Code of Conduct Policy, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO
- Paragraph 410 in KCSIE 2021 gives examples of such low- level concerns. Staff are expected to share any low -level safeguarding concerns with the DSL or a Deputy DSL.

IF YOU ARE CONCERNED ABOUT THE WELFARE OF A CHILD, OR THE BEHAVIOUR OF AN ADULT TOWARDS A CHILD, YOU MUST REPORT IT TO THE DSL.

IF YOU CANNOT MAKE CONTACT WITH THE APPROPRIATE PERSON, AND YOU BELIEVE A CHILD IS AT RISK OF SIGNIFICANT HARM, YOU MUST REPORT IT TO CHILDREN'S SOCIAL CARE YOURSELF:
Children's Reception Team (CRT) on 01329 225379 – THEN ALSO REPORT IT TO THE DSL/HEADMASTER AS APPROPRIATE

Keeping yourself safe

Ensure that at all times nothing in your behaviour could be misunderstood, leading to allegations being made against you with regard to safeguarding the welfare of children. This includes:

Not engaging children in conversation or allowing them to draw you into conversation

Not using mobile phones anywhere near children, and certainly not taking photos on the school site at any time

Not entering areas of the school that are for the use of children, especially changing rooms/toilets. You will be told which staff only facilities you may use

DO NOT establish or seek to establish social contact with pupils, including e-mail, social networking and mobile telephones

DO NOT pass your home address, phone number, e-mail address or other personal details to pupils/children

Remember, if you have a concern about the welfare of a child, you MUST report it to the DSL, Mr Tom Parsons as soon as possible.

Appendix 7 - Combined Safeguarding and Lettings Policy Appendix B

Twyford School is committed to safeguarding and promoting the welfare of children. This policy sets out the safeguarding, welfare, compliance and operational standards required for all lettings of the School's premises.
Safeguarding takes precedence over all commercial or community considerations. No letting will be approved if it compromises:

- Pupil safety or welfare
- Pupil privacy or dignity
- Site security

- Compliance with statutory duties
- The School's ethos or charitable objectives

This policy applies to all third-party use of School buildings, grounds and facilities, whether or not a charge is made.

2. Legal and Regulatory Framework
All lettings must comply with:
- Keeping Children Safe in Education (current year)
- Independent School Standards (Parts 3, 5 and 8)
- Working Together to Safeguard Children
- Prevent Duty Guidance for Schools
- Equality Act 2010
- Health and Safety at Work Act 1974
- Fire Safety Order 2005
- Licensing Act 2003
- Data Protection Act 2018 / UK GDPR
- Local authority licensing requirements

Failure to comply may result in immediate termination of the letting.

3.Governance and Responsibilities

School Responsibilities
- **Headmaster & Bursar**: final approval and authority to refuse or terminate lettings
- **Commercial Manager**: operational management of lettings and safeguarding compliance
- **DSL**: oversight of safeguarding arrangements for all hirers
- **Chair of Governors**: consulted for high-risk or borderline cases

Hirer Responsibilities
Hirers must:
- Comply with this policy and all School instructions
- Ensure all adults are vetted, trained and supervised
- Prevent unauthorised access to pupil areas
- Maintain safe adult-to-child ratios
- Ensure activities are safe, lawful and appropriate
- Ensure compliance with the Prevent Duty
- Protect the privacy and dignity of pupils and staff

The School retains overall safeguarding responsibility for the site.

3. Definition of a Letting
A letting is a **non-exclusive licensed use** of School premises by a third party.
Activities that form part of the School's corporate life (e.g., staff meetings, TPA events, School-run clubs) are **not** lettings.
Lettings will not be granted for activities that:
- Conflict with the Prevent Duty
- Promote extremist or discriminatory content
- Present unacceptable safeguarding or H&S risks
- Are incompatible with the School's ethos or charitable status
- Are deemed high-risk by the School

5. Combined Safeguarding Requirements for Hirers

5.1 Mandatory Safeguarding Documentation
Before approval, hirers working with children must provide:

- A safeguarding policy consistent with KCSIE
- Enhanced DBS and barred-list checks for all adults working with children
- DUCA checks for adults working with children aged 8 and under
- Evidence of safeguarding training (within 2 years)
- Safer recruitment procedures
- A named on-site Designated Safeguarding Lead (DSL)
- A complaints and whistleblowing policy
- Allegations procedures including referral to the LADO
- Confirmation that activities comply with the Prevent Duty

5.2 On-site Safeguarding

- The Commercial Manager will meet the hirer's DSL on arrival.
- All adults must be identifiable and appropriately vetted.
- No unauthorised access to pupil areas is permitted.
- Activities must not compromise pupil privacy, dignity or safety.

5.3 Allegations
Hirers must follow their own allegations procedures, including referral to the LADO. The School must be informed immediately of any safeguarding concern.

6. Prevent Duty Compliance
Hirers must ensure that:

- No extremist, radicalising or discriminatory content is used
- No speakers or materials undermine British values
- No political campaigning or proselytising occurs
- Activities do not expose children to harmful content

The School may request scripts, materials or speaker details in advance. Any breach results in immediate termination.

7. Risk Assessment and Safety Requirements

7.1 Hirer Responsibilities
Hirers must provide:

- Activity-specific risk assessments
- Supervision plans and adult-to-child ratios
- First aid arrangements and a first aid kit
- Fire safety and emergency plans
- PAT-tested electrical equipment
- Public liability insurance (£5 million minimum)

7.2 School Responsibilities
The School will provide:

- Site-specific risk assessments
- Swimming Pool NOP/EAP (if applicable)
- Fire evacuation routes
- Security and access instructions

Hirers must confirm in writing that they have read and understood all School-issued documents.

8. Data Protection and Privacy
Hirers collecting personal data must comply with UK GDPR and ensure:

- Secure collection and storage
- Restricted access to authorised adults
- Safe disposal of data
- Immediate reporting of any data breach

The School may process CCTV footage and access logs for safeguarding and security.

9. Conduct, Behaviour and Supervision
Hirers must ensure:

- Safe supervision at all times
- Appropriate adult-to-child ratios
- Good order and behaviour
- No smoking, vaping, drugs or illegal substances
- No alcohol without a valid TEN
- No animals without written permission
- No drones, fireworks, pyrotechnics or inflatables without approval
- No spectators unless permitted by governing body regulations

Activities must not compromise pupil privacy, dignity or safety.

10. Licensing and Permissions
Hirers are responsible for obtaining and displaying:

- Temporary Events Notice (TEN)
- Public Entertainment Licence
- Theatre Licence
- Small Lotteries Licence

Alcohol may not be sold or supplied without a valid TEN.

11. Security, Access and Site Management
Hirers must:

- Keep access codes and keys secure
- Lock buildings and gates after use
- Vacate the site by 23:59 unless otherwise agreed
- Ensure emergency services can access the site
- Prevent unauthorised access at all times

The Estates Team ensures escape routes are unlocked and safe.

12. Charges for Lettings
Charges will cover:

- Heating and lighting
- Staffing and on-costs
- Administration
- Wear and tear
- Equipment use
- Profit element (where appropriate)

Charges are reviewed annually.

13. Monitoring, Review and Quality Assurance
The School will:

- Review safeguarding compliance for each letting
- Conduct spot checks during activities

- Review this policy annually
- Update requirements in line with KCSIE and ISS changes

Hirers must cooperate fully with any safeguarding or compliance review.

14. Immediate Termination

The School may terminate a letting immediately if:

- Safeguarding concerns arise
- Prevent Duty concerns arise
- Health and safety is compromised
- Behaviour is unsafe or inappropriate
- Required documentation is missing
- Any adult works with children without appropriate checks
- The hirer breaches this policy

The School's decision is final.

Appendix 8

Child Safeguarding Confirmation

I confirm that I _____ in the capacity of _____ for the _____ group resident at / hiring facilities at Twyford School during the period ___/___/___ to ___/___/___ :

- Have been made assured of compliance and fully understand the Twyford School's policies and procedures described in the document **Combined Safeguarding and Lettings (Appendix B in lettings policy and Appendix 8 in safeguarding policy)**
- Will act to support and comply with Twyford School's policies and procedures for safeguarding and promoting the welfare of children.
- Accept my responsibility for the behaviour of my group.
- Will ensure that all members of my group are assured of compliance and will comply with the relevant Twyford School child welfare procedures.
- Have provided a complete list of the adults with my group.

For groups including children:
I also confirm that:

- My group has policies and procedures in place for safeguarding and promoting the welfare of children and up-to-date copies of these have been provided to Twyford School.
- My staff and I will act in accordance with my group's policies and procedures.
- I have provided a complete list of the adult staff/volunteers supervising the children in my group.
- Suitable checks have been completed for those staff/volunteers
- The staff/volunteers have received training on safeguarding and promoting the welfare of children (including a 'Code of Conduct for Sports Coaches' if appropriate).
- The children in my group, and their parents, have been informed about how to raise any concerns they may have regarding child welfare matters.

The 'Designated Safeguarding Lead' for this group is _____

Signed _____ Date _____

What is Prevent and what should I do if I have a concern

Prevent **SAFEGUARDS** vulnerable adults or children who are susceptible to being drawn towards radicalisation to stop them becoming terrorists or supporting terrorism. It safeguards people in the same way as safeguarding individuals from being drawn into sexual exploitation, gangs, county lines etc. Prevent works in the **non-criminal space** so those referred will not be criminalised. **Prevent is a multi-agency response** to offer support to individuals referred and deals with **all forms of extremism** such as Right Wing and Islamist extremist. The **referral process is:**

NOTICE

Member of staff notices a concern that someone is susceptible and may be enroute to being radicalised. If you identify that a susceptible person may be at risk of being radicalised or drawn into terrorism…. (**NOTE: If there is an IMMEDIATE RISK of a terror incident taking place, do not delay to contact DSL you MUST call 999 or the Anti-Terrorist Hotline 0800 789321, however DSL can support you if no waiting**)

↓

CHECK

Member of staff must check out the validity of their concern. Ask relevant non-leading questions that will help you describe your concerns and any vulnerabilities the person may have in the referral.

↓

SHARE

If your concern is valid then you MUST share the concern according to the perceived risk, by following our School's SAFEGUARDING procedures for making a safeguarding referral ie. reporting a concern on CPOMS. **NOTE: If there is an IMMEDIATE RISK of a terror incident taking place, do not wait to contact DSL you MUST call 999 or the Anti-Terrorist Hotline 0800 789321**). This information is displayed in the staff common rooms and can be found in the safeguarding policy

Make sure you state that you are making a referral under 'PREVENT' (risk of radicalisation).

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The Prevent Single Point of Contact SPOC will then contact the referrer from school to ask them to complete the national Prevent referral form. They will assist the referrer to complete this if required. This form gathers more detail about the concern and how it is relevant to Prevent (i.e. risk of radicalisation) as well as anything in the individual's life that might be affecting their wellbeing or that might make them vulnerable.

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The **Prevent SPOC** will then send the national Prevent referral form to the Police Prevent Team who will check that it is within the scope of 'Prevent' (i.e. that it is in the non-criminal space, before a crime happens).

↓

The Police Prevent Team will then send a copy of the national Prevent referral form to relevant partner agencies with a request that they carry out an information sweep. **The Police Prevent Team** will carry out a Police Gateway Assessment (PGA) to decide if a case is appropriate for Channel. If it is, they complete a vulnerability assessment framework (VAF) to determine if the threshold is met for a Channel Panel

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If CHANNEL PANEL **threshold is met,** then a multi-agency Channel Panel is convened to address the risk of radicalisation.

If CHANNEL PANEL **threshold is not met**, then the case is signposted to relevant partner agencies for other safeguarding support or early help

For the **check and share stage,** attempt to check and collate information that can include, but is not limited to:

YOUR CONCERNS – Describe in as much detail as possible the specific concern(s) relevant to Prevent.
For example:

- How / why did the Individual come to School's notice in this instance?
- Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
- Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? If so, Where? When? How?
- Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
- Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?
- Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?
- Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider any extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.
- Please describe any other concerns you may have that are not mentioned here.

COMPLEX NEEDS - Is there anything in the Individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense? For example:

- Victim of crime, abuse or bullying.
- Work, financial or housing problems.
- Citizenship, asylum or immigration issues.
- Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings.
- On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency.
- Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
- Educational issues, developmental or behavioural difficulties, mental ill health (see Safeguarding Considerations below).
- Please describe any other need or potential vulnerability you think may be present

SAFEGUARDING CONSIDERATIONS for example:

- Does the Individual have any stated or diagnosed disabilities, disorders or mental health issues? If so, has this been diagnosed.
- Have you discussed this Individual with your organisations Safeguarding / Prevent lead? What was the result of the discussion?
- If your concerns as sufficient that you want to make a safeguarding referral, have you informed the Individual /parents that you are making this referral? If so, what was the response?
- Have you taken any direct action with the Individual since receiving this information? What was the action & the result?
- Have you discussed your concerns around the Individual with any other agencies?

OTHER INFORMATION you think may be relevant. For example: social media details, military service number, other agencies or professionals working with the Individual, etc…

Appendix 9 – Changing room supervision

Pre-Prep (Nursery to Year 2 / Ages 2–7)

- Supervision Duty: Active and age-appropriate supervision. Due to the age and developmental stage of pupils, staff remain available to support children with changing where necessary, while encouraging increasing independence and respecting each child's dignity and privacy.
- Nursery: Nursery children do not typically change clothing for PE or other routine physical activities. Where a child requires a change of clothing for another reason, staff follow the school's agreed intimate care and safeguarding procedures, providing appropriate support while maintaining the child's dignity and privacy.
- Reception to Year 2 – Classroom Changing: For PE and other school activities, pupils may change within their classroom. Boys and girls may change within the same classroom, with staff providing appropriate supervision and managing changing sensitively and respectfully.
- Independence and Dignity: Children are encouraged to dress and undress independently wherever they are able to do so. Any individual support should be proportionate to the child's age and needs.
- Staff Supervision: Staff maintain appropriate oversight of the group while avoiding unnecessary or intrusive observation of children changing.
- Individual Needs: Where a pupil has additional SEND, medical, toileting or personal-care needs, appropriate individual arrangements should be agreed and followed.

Pre-Prep Swimming Changing Rooms (Oaks to Year 2 / Ages 4–7)

- **Communal Changing Areas:** Boys and girls share the changing areas for swimming.
- **Active Supervision:** Due to pupils' age, staff maintain active supervision within or immediately adjacent to the changing areas as appropriate. Children may require practical support with dressing, belongings and preparing safely for swimming.
- **Privacy and Dignity:** Staff should balance the need for effective safeguarding and supervision with children's developing need for privacy and independence.
- **Safe Transitions:** Particular attention should be given to safe movement through wet areas, appropriate behaviour and ensuring that all pupils are accounted for before moving between the changing rooms and poolside.
- **Assistance:** Where a child requires direct assistance with changing, this should be provided sensitively and in accordance with the school's safeguarding and intimate care procedures.

Lower Prep School (Years 3 to 5 / Ages 7–10)

- **Supervision Duty:** Active, transitional monitoring. Pupils change independently; the role of the supervisor is to maintain behavioural order, prevent child-on-child bullying, and ensure efficient transitions.
- **Staff Gender Mandate: Supervisors should ideally match the biological sex of the pupils.** As pupils develop a heightened sense of personal privacy, Twyford School requires that every practical operational effort be made to deploy a male supervisor for male changing zones, and a female supervisor for female changing zones.
- **Staff Positioning & "Entrance-Based" Supervision:** Staff **are permitted inside the communal changing room**, but they must supervise discreetly. Staff must position themselves actively

near to the entrance door, maintaining an overview of the room to deter negative behaviour while avoiding intrusive proximity to pupils who are undressing.

Upper Prep School (Years 6 to 8 / Ages 10–13)

- **Supervision Duty:** Discreet safeguarding overview. Pupils require a high level of privacy, but staff presence inside is maintained to ensure absolute safety, prevent bullying, and strictly enforce the school's mobile device ban.
- **Staff Gender Mandate: Supervisors must be the exact same biological sex as the changing area they are monitoring.** In strict accordance with statutory requirements for children approaching or aged 11 and over, a male staff member must never monitor a female changing environment, and a female staff member must never monitor a male changing environment **unless the circumstances are exceptional such as a safeguarding matter.**
- **Staff Positioning & Discreet Entry:** Staff **are permitted inside the room** but must remain positioned **discreetly near the main entrance**.
- **Entry Protocol:** Before crossing the threshold into the room, the supervisor must **knock loudly and verbally announce their presence** (e.g., *"Staff entering"*). This gives pupils an immediate opportunity to cover up or adjust their clothing before the supervisor takes up their position near the door.

Swimming Pool Changing Rooms: Age-Dependent & Discreet Supervision Guidelines

To ensure consistency with our standard changing room policies while accommodating the unique wet-side layout and increased vulnerability of the pool environment, supervision in the swimming changing facilities must adhere strictly to the following age-dependent framework:

Lower Prep School swimming changing rooms (Years 3 to 5 / Ages 7–10)

- **Active, Transitional Monitoring:** Staff must maintain an active presence to ensure safe, swift transitions between the poolside and the changing cubicles, preventing slips, falls, and horseplay in wet areas.
- **Discreet Positioning:** Supervisors should remain stationed near the main entrance threshold of the pool changing zone. They must maintain a clear overview of communal walkways to uphold behavioural standards without invading the personal space of pupils using individual cubicles.
- **Gender Alignment Efforts:** Every practical operational effort must be made to deploy a male supervisor for male pool changing zones and a female supervisor for female pool changing zones.

Upper Prep School Swimming Changing Rooms (Years 6 to 8 / Ages 10–13) — Pool

- **Strict Safeguarding Overview:** Because older pupils require a high degree of privacy, staff supervision for this age group must prioritise oversight from **outside** the main changing room footprint. Presence is maintained to ensure physical safety, prevent bullying, and enforce the total ban on mobile devices and cameras in wet areas.
- **Supervision from Outside:** Rather than stationing staff inside the active changing space, supervisors must monitor the environment from a fixed position immediately **outside** the main entrance door/threshold. From this external vantage point, staff can oversee entry/exit corridors, monitor sound levels, and deter unauthorised access while granting pupils complete visual privacy inside.
- **Entry Protocol (When required):** Staff are only permitted to cross the threshold into the room under strict necessity (such as dealing with an acute behavioural incident, a medical emergency, or a confirmed safeguarding concern). Before doing so, the supervisor must knock loudly and verbally announce their presence (e.g., "Staff entering the pool changing area") to give pupils immediate warning.

- **Absolute Gender Mandate:** Supervisors monitoring the area (whether from the external doorway or entering for an essential check) must be of the exact same biological sex as the changing area they are overseeing, with zero exceptions for pupils aged 11 and over.