

THE MOUNT SCHOOL

SAFEGUARDING & CHILD PROTECTION

POLICY

(INCLUDING EYFS)

2026–2027

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Policy writer	Euan Burton-Smith
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Approved by	Chris Sellers - Director / Proprietor

This comprehensive policy retains the operational breadth of the School's 2025–2026 safeguarding policy and updates it for Keeping Children Safe in Education 2026, the Independent School Standards and the current DfE independent-school guidance.

Safeguarding compliance depends on both accurate policy and effective implementation. This document therefore states reporting routes, named contacts, referral mechanisms, thresholds, recording expectations and operational responsibilities rather than relying only on cross-references.

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1. Commitment, scope and statutory framework

Children need to be safe and to feel safe in School. They have the right to protection from abuse, neglect, exploitation and other harm. The Mount School will act in the best interests of the child and will maintain an open and positive safeguarding culture in which concerns are identified early, children are listened to and staff understand that safeguarding is everyone's responsibility.

This policy applies to the whole School, including the EYFS and nursery provision, and to all pupils, staff, supply and agency staff, contractors, volunteers, Directors, external providers and visitors.

- maintain an attitude that 'it could happen here';
- act immediately where a child is in danger or at risk of significant harm;
- recognise that children may not feel ready or know how to tell someone they are being abused, exploited or neglected;
- never assume that somebody else will take action;
- understand that safeguarding concerns may arise online or offline, inside or outside School, and may involve adults or other children;
- consider the wishes and feelings of the child while recognising that safeguarding duties may require action even where the child does not want information shared;
- provide help and support at the earliest appropriate stage; and
- work effectively with parents, safeguarding partners, children's social care, police and other agencies.

1.1 Statutory and regulatory framework

- Keeping Children Safe in Education 2026 (KCSIE);
- Working Together to Safeguard Children 2026;
- the Education (Independent School Standards) Regulations 2014, particularly Part 3, paragraph 7 and relevant standards in Parts 4 and 8;
- DfE Independent School Standards guidance, April 2026;
- the EYFS statutory framework, where applicable;
- the Children Acts 1989 and 2004;
- the Safeguarding Vulnerable Groups Act 2006;
- the Equality Act 2010 and Human Rights Act 1998;
- the Prevent duty guidance;
- Working Together to Improve School Attendance and current pupil-registration requirements;
- current statutory guidance on mobile phones in schools and restrictive interventions;
- the Data Protection Act 2018 and UK GDPR; and
- local Kirklees safeguarding partnership procedures and thresholds.

The proprietor has a regulatory duty to ensure that arrangements are made to safeguard and promote pupils' welfare and that those arrangements have regard to statutory guidance. The School's safeguarding policy must be comprehensive, specific to the School, effectively implemented, regularly reviewed and supported by appropriate external referral contacts.

1.2 KCSIE reading requirement

All staff, including staff who do not work directly with children, must read and understand at least Part One of KCSIE 2026. The former shortened Annex A has been removed. The School will ensure staff confirm that they have read and understood Part One and will provide mechanisms to support understanding.

2. Safeguarding contacts and external referral contacts

2.1 The Mount School safeguarding team

Role	Name	Email	Key responsibility
DSL; Headteacher; Prevent Lead; Designated LAC Lead; EYFS safeguarding lead	Euan Burton-Smith	euan.burton-smith@themount.org.uk	Lead safeguarding and child protection; referrals; case management; allegations other than against Head.
DDSL; Wellbeing Lead; Deputy EYFS safeguarding lead	Natalie Sandford	natalie.sandford@themount.org.uk	Deputise for DSL; receive and act on concerns; support casework and wellbeing.
DDSL and Deputy EYFS safeguarding lead	Charlotte Kitchen	charlotte.fox@themount.org.uk	Deputise for DSL; receive and act on concerns;
Director / Proprietor	Chris Sellers	chris.sellers@themount.org.uk	Strategic safeguarding oversight; allegations/concerns about Headteacher; challenge and assurance.

School telephone: 01484 426432.

A safeguarding concern must not be left in an email inbox. Urgent concerns must be communicated verbally to the DSL/DDSL and recorded on the School safeguarding system. If the concern is about the Headteacher, it must be reported directly to the Director and not to the Headteacher.

2.2 Local authority and national contacts

Service	Contact	Purpose
Kirklees Children's Social Care – Duty and Advice	01484 414960 DutyAdvice.Admin@kirklees.gov.uk	Advice/referral where a child may need Family Help, s17 support or child-protection intervention.
Kirklees LADO	01484 221126 LADO.cases@kirklees.gov.uk	Concerns/allegations about adults working with children; suitability and harm-threshold advice.
Kirklees Prevent Hub	01924 483747 prevent@kirklees.gov.uk	Prevent and Channel advice/referral.
Police emergency	999	Immediate danger, serious injury, crime in progress or immediate threat.
Police non-emergency	101	Non-emergency police reporting/advice.
Childline	0800 1111	Confidential support for children.
NSPCC Helpline	0808 800 5000 help@nspcc.org.uk	Adults worried about a child.
NSPCC Whistleblowing Advice Line	0800 028 0285	Staff concerned about safeguarding practice in their organisation.
NSPCC FGM Helpline	0800 028 3550 fgmhelp@nspcc.org.uk	FGM advice and support.
UK Safer Internet Centre – Professionals Online Safety Helpline	helpline@saferinternet.org.uk	Professional online-safety advice.
Internet Watch Foundation	www.iwf.org.uk	Reporting criminal online child sexual abuse content.
Operation Encompass Professionals' Advice and Guidance Line	0204 513 9990 (Mon–Fri, 8am–1pm)	Advice about supporting children experiencing domestic abuse.
National Domestic Abuse Helpline	0808 2000 247	24-hour domestic-abuse support.
National police Prevent advice line	0800 011 3764	Advice about possible radicalisation into terrorism.

The DSL will verify local contact details at least annually and whenever notified of change. Staff must use the current Kirklees referral route even if a contact detail in a printed copy later changes.

3. Immediate reporting mechanisms and referral procedure

The School requires a clear distinction between: (a) concerns about a child; (b) concerns about another child's behaviour; (c) allegations/concerns about adults; (d) low-level concerns; and (e) concerns about safeguarding practice.

Concern	Report to	When	Required action
Child welfare / possible abuse, neglect or exploitation	DSL/DDSL	Immediately; same working day	Verbal report plus safeguarding-system record. DSL considers threshold and referral.
Immediate danger / significant harm	999 / Children's Social Care; inform DSL	Immediately	Do not wait for DSL. Protect child and make referral.
Child-on-child abuse / HSB / weapon	DSL/DDSL	Immediately	Safeguarding record; immediate safety; risk assessment; victim and alleged perpetrator support.
Adult may meet harm threshold	Headteacher/case manager	Immediately	Consider LADO. Avoid substantive investigation before LADO advice where threshold may be met.
Concern about Headteacher	Director	Immediately	Director considers/contacts LADO; do not inform Head first.
Low-level adult concern/self-report	Headteacher/DSL	Same day where incident-specific	Written low-level record; threshold review; patterns monitored.
Safeguarding failure / concern not acted on	Head/Director/external route	Without delay	Escalate; staff may refer directly; whistleblowing route available.

3.1 Referral decision-making

The DSL will consider the nature, seriousness and immediacy of the concern; the child's age and development; SEND, health and communication needs; previous concerns; family context; risk to other children; online/offline context; the child's wishes and feelings; local thresholds; and whether the concern indicates Family Help, section 17 support, section 47 child-protection enquiries, police involvement or another specialist pathway.

Parental consent is not a prerequisite to sharing information where there is a safeguarding basis to do so.

However, the School will ordinarily work openly with parents and explain referrals unless doing so could place a child or another person at increased risk, impede a criminal investigation or otherwise be contrary to the child's welfare.

3.2 If the DSL is unavailable

The DDSL will act. If neither is available, staff must not delay safeguarding action. They may contact Children's Social Care or police directly. The DSL must be informed as soon as practicable afterwards.

3.3 Escalation

If, after referral, the child's situation does not appear to be improving, the DSL will follow local escalation procedures. Staff who remain concerned must challenge and escalate. Any staff member can make a direct referral.

4. Responding to a disclosure and professional curiosity

Children may communicate concerns verbally, through behaviour, play, writing, drawings, online activity, attendance patterns, changes in presentation or indirectly through another person. A child may not recognise an experience as abusive or may be prevented from speaking by fear, shame, loyalty, disability, communication needs or threats.

4.1 During a conversation with a child

- listen carefully and give the child time;
- remain calm and take the child seriously;
- use the child's preferred communication method and make reasonable adjustments where required;
- reassure the child that they have done the right thing by speaking;
- do not promise confidentiality; explain that information must be shared with people who can help;
- do not investigate, interrogate or ask leading questions;
- use only open prompts necessary to clarify what the child is communicating;
- do not ask the child to repeat the account unnecessarily;
- do not criticise the alleged perpetrator or make promises about what will happen next;
- record the child's words as accurately as possible and distinguish observation from interpretation; and
- report immediately to the DSL/DDSL.

4.2 Additional advice to staff

Staff must maintain professional boundaries, avoid placing themselves in situations that could be misinterpreted and follow the Staff Code of Conduct. One-to-one work, physical contact, intimate care, transport, communication with pupils and use of technology must follow School procedures.

Where staff are uncertain whether something is a safeguarding concern, they should share it. The DSL decides the next step; staff should not withhold information because they believe it is too small or because another explanation may exist.

5. Management of safeguarding: DSL, DDSL and Director

5.1 Role of the DSL

- take lead responsibility for safeguarding and child protection, including online safety and understanding filtering and monitoring;
- advise and support staff and ensure concerns are responded to promptly;
- make and support referrals and contribute to strategy discussions, conferences and multi-agency plans;
- understand Family Help, local thresholds and statutory assessment processes;
- maintain accurate, secure safeguarding records and ensure actions and rationale are recorded;
- ensure safeguarding information is transferred securely and promptly when pupils move;
- share information before a pupil arrives where needed for risk assessment, safety planning or support;
- work with social workers, police, health, local authority, Prevent/Channel and other agencies;
- promote educational outcomes of children known or previously known to social care;
- ensure appropriate safeguarding arrangements for looked-after and previously looked-after children;
- support the School's response to child-on-child abuse, HSB, serious violence and exploitation;
- work with the Director, IT provider and responsible SLT member on filtering and monitoring;
- ensure staff have access to and understand safeguarding policies and procedures;
- maintain professional knowledge through formal training at least every two years and updates at least annually; and
- ensure robust safeguarding cover in their absence.

5.2 Role of the DDSL

- be trained to the same standard expected for a deputy DSL;
- support the DSL and undertake delegated safeguarding activity while recognising that lead responsibility remains with the DSL;
- act in the DSL's absence and ensure concerns are not delayed;
- support record keeping, referrals, risk assessment, pupil support and staff advice; and
- liaise with safeguarding partners and agencies as required.

5.3 Role of the Director / Proprietor

- ensure safeguarding arrangements meet paragraph 7 of the ISS and have regard to KCSIE and other statutory guidance;
- ensure an effective whole-school safeguarding culture and sufficient resources, authority and time for the DSL;
- ensure the policy is comprehensive, School-specific, available to parents and effectively implemented;
- receive safeguarding training and understand strategic responsibilities;
- manage concerns/allegations about the Headteacher and liaise with the LADO;
- ensure annual review of filtering and monitoring effectiveness;
- assure safer recruitment, SCR and DBS referral arrangements;
- review safeguarding themes, serious incidents, referrals, complaints, attendance and low-level concerns without compromising confidentiality; and
- challenge leaders and ensure deficiencies are remedied promptly.

6. Staff responsibilities, induction and training

All staff have a responsibility to provide a safe environment in which children can learn and to identify children who may benefit from help or protection.

6.1 Induction

- this Safeguarding and Child Protection Policy;
- KCSIE 2026 Part One;
- Staff Code of Conduct / Disciplinary and Conduct Policy;
- Behaviour and Anti-Bullying Policies;
- Online Safety and filtering/monitoring responsibilities;
- Mobile Phone and EYFS Mobile Devices arrangements;
- Whistleblowing Policy;
- identity and role of the DSL/DDSL;
- how to record and report concerns;
- child-on-child abuse and harmful sexual behaviour;
- allegations and low-level concerns about adults;
- Prevent;
- children absent from education; and
- role-specific EYFS, intimate-care, medical, SEND and trip procedures where relevant.

6.2 Ongoing training

All staff will receive safeguarding training at induction and regularly thereafter, with formal updating at least annually and additional briefings when risks or guidance change. Staff must understand local Family Help arrangements, referrals, information sharing, online safety, child-on-child abuse, exploitation, mental health, SEND vulnerabilities and adult-concern procedures.

6.3 Volunteers, contractors and visitors

Safeguarding information and training will be proportionate to the role, frequency and nature of contact with children. Adults who work regularly with children must understand reporting arrangements and professional boundaries.

7. Family Help, children in need and child protection

The School recognises the continuum of support from universal and community-based help, through targeted early help within Family Help, to statutory children's social care intervention.

7.1 Children who may benefit from Family Help

- children with SEND or health conditions;
- young carers;
- children affected by parental offending or imprisonment;
- children who are pregnant or parents;
- children showing early signs of abusive, violent or harmful behaviour;
- children experiencing repeated or prolonged absence;
- children at risk of exploitation, trafficking or modern slavery;
- children experiencing homelessness or temporary accommodation;
- children affected by domestic abuse, parental mental ill-health or substance misuse;
- children experiencing bullying, discrimination or online harm; and
- children whose family circumstances or relationships create barriers to wellbeing or learning.

7.2 Section 17 and section 47

A child in need may require services under section 17 of the Children Act 1989. Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, section 47 child-protection enquiries may be required. The DSL will understand local thresholds and cooperate with statutory assessment and planning.

7.3 Multi-agency working

The School will contribute to Family Help plans, child-in-need plans, child-protection plans, strategy discussions, conferences, core groups and other multi-agency arrangements. Staff may be required to provide information, attend meetings and undertake agreed actions.

8. Information sharing, safeguarding records and transfers

Information sharing is essential for effective safeguarding. Data-protection law does not prevent the sharing of relevant information to protect children.

- share information that is relevant, necessary and proportionate;
- present information clearly and in context;
- distinguish current risk from historic information;
- record decisions to share or not share and the rationale;
- seek consent where appropriate, but do not allow lack of consent to prevent justified safeguarding sharing;
- keep safeguarding records secure and separate from the main pupil file; and
- protect confidentiality while ensuring those who need information to keep a child safe receive it.

8.1 Transfer of safeguarding files

When a child leaves, the DSL will transfer the child-protection file securely and separately from the main pupil file and obtain confirmation of receipt. For an in-year transfer, the School will aim to complete transfer within five days; for a transfer at the start of a new term, within the first five days of that term, in line with current KCSIE.

Where information indicates that a child may present a safeguarding risk to themselves or others, or needs immediate support, relevant information will be shared with the receiving setting before arrival where necessary. This allows risk assessments, safety plans and support to be ready. Direct DSL-to-DSL discussion will be used where it adds clarity or protects safety.

9. Child-on-child abuse: prevention, response and support

The Mount School has a zero-tolerance approach to child-on-child abuse. It is preventable. The absence of reports does not mean abuse is not occurring.

Child-on-child behaviour exists on a continuum from inappropriate or problematic behaviour through harmful behaviour to serious violence and abuse. It can occur online, offline or both, on or off School premises.

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse in intimate personal relationships between children;
- physical abuse, including hitting, kicking, shaking, biting or otherwise causing physical harm;
- serious assault, threats and weapon-related harm;
- sexual violence and sexual harassment;
- harmful sexual behaviour;
- consensual or non-consensual sharing of nude, semi-nude or intimate images, including AI-generated images;
- upskirting;
- initiation/hazing-type violence or rituals;
- coercion, control, exploitation or financial abuse; and
- online abuse that facilitates, threatens or accompanies offline harm.

9.1 Prevention

The School will address culture as well as incidents. Staff will challenge sexist, misogynistic, misandrist, racist, homophobic, biphobic, sexualised and other derogatory behaviour. Staff will identify higher-risk locations and times, use pupil voice, teach healthy relationships and intervene early when behaviour becomes problematic.

9.2 Response and support

All reports will be taken seriously. The DSL will consider immediate safety, the needs and wishes of the child harmed, the safeguarding and developmental needs of the child alleged to have caused harm, risk to others, whether children should be separated, and whether social care or police involvement is required.

Separate risk assessments and safety/support plans will be used where necessary. Sanctions under the Behaviour Policy may form part of the response but will not replace safeguarding assessment or support.

10. Sexual violence, sexual harassment and harmful sexual behaviour

Sexual violence and sexual harassment can occur between children of any age and sex and can occur through groups. They may be online, offline or both. The School will never normalise sexual harassment as banter or an inevitable part of growing up.

10.1 Developmental context

The DSL will consider the child's age and stage of development, consent, coercion, power imbalance, persistence, secrecy, distress, the nature of the behaviour, use of technology, and any age or developmental difference. An age difference of more than two years or a pre-/post-pubertal difference may be relevant but is not determinative.

10.2 Response to a report

- reassure the child that they are being taken seriously;
- do not make the child feel ashamed or responsible for causing a problem;
- consider immediate safety and whether the children can continue to share spaces safely;
- record the report accurately;
- consider children's social care and police thresholds;
- avoid prejudicing a criminal investigation;
- put in place risk and needs assessments;
- provide ongoing support to the child harmed; and
- provide appropriate safeguarding and behaviour support to the child alleged to have caused harm.

10.3 Intimate images

Every incident involving the making, requesting, sending, receiving or sharing of nude, semi-nude or other intimate images by children will receive a safeguarding response. This includes photographs, videos, live streams, digitally altered images, deepfakes and AI-generated intimate imagery.

Staff must not view, copy, print, save or forward intimate imagery except where specifically permitted by current safeguarding guidance and necessary for an authorised response. The DSL will follow current UKCIS/DfE guidance.

11. Concerns and allegations about adults

This procedure applies to staff, supply staff, agency staff, volunteers, contractors, trainee teachers and other adults working with or on behalf of the School.

11.1 Harm threshold

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

11.2 Reporting

Any concern that may meet the harm threshold must be reported immediately to the Headteacher as case manager. The Headteacher must consider LADO consultation/referral and follow Kirklees procedures. The School will not conduct a substantive internal investigation before obtaining LADO advice where the threshold may be met.

Where the allegation concerns the Headteacher, the matter must be reported directly to Chris Sellers, Director, who will liaise with the LADO. The Headteacher must not be informed first.

11.3 Supply staff, contractors and trainees

The School will work with the employing or supplying organisation but will not simply terminate use of the individual as an alternative to safeguarding action. The School and third party share safeguarding responsibilities and the School will ensure the allegation is managed appropriately.

11.4 Suspension and alternatives

Suspension is not an automatic response. The case manager will consider LADO advice, risk, alternatives to suspension and the need to protect children and the integrity of any investigation.

11.5 DBS/TRA referrals

Where the legal conditions are met, the School will make a referral to the DBS. Where appropriate, a referral to the Teaching Regulation Agency will also be considered. Resignation or cessation of use does not remove referral duties.

12. Low-level concerns and self-reporting

The School seeks a culture of openness, trust and transparency in which expected adult behaviour is clear, staff feel confident to report concerns and concerns are handled promptly, sensitively and proportionately.

12.1 Definition

A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt', that an adult may have acted in a way inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but which does not meet the harm threshold.

- being over-friendly with children;
- having favourites;
- taking photographs of children on a personal device contrary to policy;
- engaging one-to-one in a secluded area or behind a closed door without good reason;
- humiliating pupils;
- inappropriate social-media or messaging contact;
- boundary concerns; or
- any conduct that creates a sense of unease about suitability or professional judgement.

12.2 Self-reporting

Staff are encouraged to self-report where their conduct may have fallen below expected standards, could be misinterpreted or placed them in a situation that could appear compromising.

12.3 Reporting mechanism

Low-level concerns and self-reports must be reported to the Headteacher/DSL as soon as reasonably possible and on the same working day where they relate to a specific incident. If the concern is about the Headteacher it must be reported to the Director.

12.4 Handling

The Headteacher will determine whether the matter is genuinely low level or may meet the harm threshold. Where there is doubt, LADO advice will be sought. The Headteacher may gather proportionate information and may respond through management guidance, training, supervision, clarification of expectations, disciplinary/capability procedures or no further action.

12.5 Confidentiality and records

The School will respect confidentiality so far as possible but will not promise that the reporter will always remain anonymous. Records will include the concern, context, reporter where known, action taken and rationale. Records will be securely retained and reviewed for patterns. A pattern may move a matter to the harm threshold or identify a wider cultural issue.

13. Whistleblowing and escalation

Staff and volunteers must be able to raise concerns about poor or unsafe safeguarding practice and potential failures in the School's safeguarding regime. Concerns should normally be raised with the Headteacher; concerns about the Headteacher or unresolved concerns should be raised with the Director.

Where internal reporting is not safe, appropriate or effective, staff may use the NSPCC Whistleblowing Advice Line or another prescribed external body. Nothing prevents a direct referral to Children's Social Care or police where a child may be at risk.

14. Safer recruitment and suitability

The School follows safer recruitment procedures in accordance with KCSIE, the Independent School Standards and its Safer Recruitment Policy. The safeguarding policy records the overarching requirement; the detailed recruitment process is contained in the linked policy.

- identity and right-to-work checks;
- enhanced DBS and children's barred-list checks where required/eligible;
- prohibition and section 128 checks where applicable;
- qualifications where required;
- references and employment history;
- online searches of shortlisted candidates as part of due diligence;
- overseas checks or additional risk assessment where appropriate;
- checks on agency/supply staff and contractors;
- volunteer checks based on regulated activity and role;
- checks for trainee teachers and self-employed workers;
- ongoing suitability;
- Single Central Record requirements; and
- DBS and TRA referral duties.

From 1 September 2026, the supervision exemption from regulated activity for relevant teaching, training, instructing, caring for or supervising children is removed. The School will assess the nature and frequency of activity rather than assuming every volunteer is or is not in regulated activity.

15. Preventative education, pupil voice and safeguarding culture

The School will teach pupils how to keep themselves and others safe through age-appropriate relationships education, health education, PSHE, computing/online safety, assemblies and wider curriculum opportunities.

- healthy and respectful relationships;
- consent, privacy and personal boundaries;
- how to recognise unsafe or abusive behaviour;
- bullying, discrimination and prejudice;
- online harms and grooming;
- image sharing, deepfakes and AI-generated imagery;
- pornography and harmful/misogynistic influencers in an age-appropriate manner;
- exploitation and coercion;
- mental health and seeking help;
- how and where to report concerns; and
- that abuse is never the victim's fault.

Pupil voice is an important source of safeguarding evidence. Leaders will listen to children about whether they feel safe, whether adults respond, where risks occur and whether particular groups experience barriers to belonging or reporting.

16. Online safety, filtering and monitoring, AI and digital harms

Online safety is integral to safeguarding. Risks are considered under the four Cs: content, contact, conduct and commerce.

16.1 Content

Risks include pornography, extreme sexual or physical violence, racism, misogyny, self-harm and suicide content, extremism, disinformation, harmful challenges, AI-generated harmful content and material that normalises abuse.

16.2 Contact

Risks include grooming, sexual exploitation, criminal exploitation, financial exploitation, adults posing as children, coercive peer contact and harmful interactions through games, social media, messaging or AI systems.

16.3 Conduct

Risks include bullying, harassment, sharing intimate images, livestreaming, unsafe disclosure of personal information, abusive communication, cybercrime and misuse of generative AI.

16.4 Commerce

Risks include scams, phishing, gambling-style features, inappropriate advertising, financial exploitation and pressure to make payments or transfers.

16.5 Filtering and monitoring

The School will maintain appropriate filtering and monitoring systems. The Director will ensure effectiveness is reviewed at least annually. The responsible SLT member, DSL and IT support will conduct and record checks at least annually to establish that systems operate effectively on relevant devices and in relevant locations. Staff will understand their monitoring responsibilities and how to report concerns.

The detailed technical arrangements, including Pearce IT, NetSupport DNA and Ubiquiti filtering arrangements, are set out in the Online Safety Policy and will be reviewed for KCSIE 2026 consistency.

17. Mobile phones, cameras and EYFS devices

The School's mobile-phone arrangements are safeguarding-led. Pupils should not use personal internet-capable mobile devices in School except where expressly authorised for a specific SEND/medical or educational reason under School procedures.

Staff personal phones and cameras must not be used to photograph or record pupils. In the EYFS, personal phones, cameras and image-capable connected/wearable devices are subject to particularly strict controls. School-approved equipment and systems must be used for authorised images.

Detailed requirements are in the Mobile Phone Policy and EYFS Mobile Devices Policy and will reflect statutory mobile-phone guidance from September 2026.

18. Definitions of abuse and neglect

18.1 Abuse

Abuse is a form of maltreatment. A person may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Harm can include ill-treatment that is not physical and the impact of witnessing the ill-treatment of others, including domestic abuse. Abuse can occur in a family, institutional or community setting, online or offline. Children may abuse other children and may also cause harm to parents, carers or other family members.

18.2 Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It may also include fabricated or induced illness.

18.3 Emotional abuse

Emotional abuse is persistent emotional maltreatment likely to cause severe and adverse effects on emotional development. It may include persistent criticism, belittling or name-calling; conveying worthlessness; silencing or ridiculing; inappropriate expectations; overprotection; preventing normal interaction; witnessing ill-treatment; serious bullying; exploitation or corruption.

18.4 Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening. It can involve physical contact, including assault by penetration and non-penetrative acts, and non-contact activity such as involving children in sexual images, grooming, encouraging sexual behaviour or watching sexual activity. Technology may facilitate abuse.

18.5 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development. It can include failure to provide food, clothing, shelter, supervision, medical care or emotional responsiveness.

19. Indicators of physical abuse

No single indicator proves abuse. Staff must consider patterns, explanations, developmental ability and context and report concerns rather than diagnose.

- injuries inconsistent with the explanation or developmental stage;
- multiple injuries, injuries of different ages or repeated unexplained injuries;
- bruising in unusual areas or with patterns suggesting an implement or grip;
- burns or scalds with unusual patterns;
- bite marks;
- fractures or injuries where medical attention was delayed;
- fear of going home or unusual fear of particular adults;
- flinching, watchfulness or extreme compliance;
- covering injuries or reluctance to change for PE/swimming;
- frequent attendance at different medical services; and
- explanations that change or do not fit the injury.

Staff must not photograph injuries on personal devices. Body maps or approved safeguarding records should be used in accordance with School procedures.

20. Indicators of emotional abuse

- marked low self-esteem, anxiety or fearfulness;
- extreme passivity, compliance, aggression or withdrawal;
- developmental delay without adequate explanation;
- persistent self-criticism or statements of worthlessness;
- age-inappropriate responsibility for adults or siblings;
- fear of making mistakes;
- significant changes in behaviour or school engagement;
- social isolation or difficulty forming relationships;
- persistent parent/carer criticism, humiliation, scapegoating, threats or rejection; and
- exposure to domestic abuse or chronic family conflict.

Emotional abuse may occur alone or alongside other forms of abuse.

21. Indicators of sexual abuse

- sexual knowledge or behaviour inappropriate to age or development;
- sexualised language, play or drawings that cause concern;
- unexplained gifts, money or possessions;
- pregnancy or sexually transmitted infection;
- pain, bleeding, soreness or injury in genital/anal areas;
- difficulty walking or sitting without medical explanation;
- fear of a particular person or place;
- sudden changes in behaviour, attendance, sleep, eating or attainment;
- self-harm, substance use or running away;
- online sexualised contact, grooming, image sharing or secrecy; and
- a child describing sexual activity, contact, coercion or exploitation.

Children may display no obvious signs. A disclosure must always be taken seriously.

22. Indicators of neglect

- persistent hunger or inadequate nutrition;
- poor hygiene, unsuitable clothing or untreated dental/medical needs;
- frequent tiredness or falling asleep;
- inadequate supervision or being left with unsafe carers;
- frequent absence or lateness linked to unmet care needs;
- failure to attend health appointments;
- unsafe home conditions;
- developmental delay or poor growth;
- child taking on excessive responsibility for their own basic care; and
- persistent lack of emotional responsiveness or stimulation.

Poverty and neglect are not synonymous. Staff must consider family circumstances sensitively while acting where a child's needs are persistently unmet.

23. SEND, disabilities, intimate care and medical conditions

Children with SEND, disabilities or health conditions can face additional safeguarding challenges. Staff must avoid assuming that behaviour, injury or distress is simply part of a child's condition.

- communication barriers;
- not recognising behaviour as abusive;
- greater dependence on adults;
- increased exposure to intimate/personal care;
- social isolation;
- disproportionate bullying;
- difficulty accessing reporting routes;
- being unable to describe pain or injury; and
- assumptions by adults that indicators are caused by SEND or health needs.

23.1 Intimate care

Intimate care must protect dignity, privacy and safety. Staff will follow agreed plans, avoid unnecessary exposure, explain what they are doing in an age-appropriate way and report any concern arising during care.

23.2 Medical conditions and clinical incidents

A clinical incident may also be a safeguarding incident. Where the circumstances, explanation, pattern, delay in seeking help or adult response raises concern, staff must report it to the DSL rather than treating it solely as medical.

24. Mental health and safeguarding

Mental-health difficulties can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Safeguarding experiences can also cause or worsen mental ill-health.

- self-harm;
- eating disorders or significant disordered eating;
- suicidal ideation;
- plans or preparations to end life;
- severe anxiety, distress or withdrawal;
- sudden marked changes in behaviour;
- trauma responses; and
- online content or relationships that increase mental-health risk.

Staff must report safeguarding concerns to the DSL. The School will provide early support and liaise with specialist services as appropriate. If a child is in immediate danger or requires urgent medical attention, staff will call 999 or seek urgent NHS/A&E support. Parents will normally be informed unless doing so could increase risk.

25. Children absent from education, missing children and attendance

Absence can be both a symptom and a cause of safeguarding concerns. Repeated or prolonged absence, unexplained absence, persistent lateness, part-time timetables, repeated suspension, unexplained withdrawal or children missing education can indicate abuse, neglect, exploitation, mental ill-health or unmet SEND needs.

The School will respond early to concerning patterns, cross-reference attendance with safeguarding information and work with families and agencies. Staff must follow the Attendance Policy and Missing Child Policy.

25.1 Missing from School during the day

Where a child cannot be located, the School will follow the Missing Child Policy immediately, checking the site and known information, contacting parents and police as appropriate, recording actions and considering whether the incident creates or reflects a safeguarding concern.

26. Looked-after, previously looked-after and kinship-care children

The School recognises the particular safeguarding and educational needs of children in care, previously in care and those in kinship arrangements. The Designated Looked After Children Lead will work with social workers, carers and relevant virtual-school arrangements and ensure staff have the information needed to support safety and educational outcomes.

Safeguarding information will be handled sensitively and shared on a need-to-know basis. Changes in placement, contact arrangements or legal status will be considered for their impact on welfare, attendance and behaviour.

27. Young carers and children affected by parental offending

27.1 Young carers

Young carers may experience fatigue, anxiety, absence, isolation, reduced participation and inappropriate responsibility. Staff should recognise possible caring responsibilities and consider Family Help or other support.

27.2 Family members in prison and parental offending

Parental imprisonment or offending can affect emotional wellbeing, stigma, finances, housing, relationships and safety. The School will consider the child's individual needs and appropriate support rather than making assumptions about the family.

28. Child criminal exploitation, child sexual exploitation and county lines

CCE and CSE involve coercion, manipulation, deception or abuse of power to exploit a child. Exploitation can occur through individuals, peer groups or organised networks and online or offline. A child cannot consent to exploitation.

- unexplained money, gifts, clothing or phones;
- relationships with older or controlling individuals;
- missing episodes or unexplained travel;
- changes in friendship groups;
- decline in attendance or attainment;
- unexplained injuries;
- carrying multiple phones or SIMs;
- fear, debt or threats;
- sexualised behaviour or unexplained sexual-health concerns;
- staying away from home; and
- being found in areas or accommodation linked to exploitation.

28.1 County lines

County lines commonly involves criminal networks using children to move drugs or money, often through coercion, debt, threats or violence. Movement for exploitation may amount to trafficking or modern slavery. The DSL will consider child-protection, police and NRM routes.

29. Modern slavery, trafficking, financial exploitation and the NRM

Modern slavery includes trafficking, slavery, servitude and forced or compulsory labour. Children may be moved or controlled for criminal, sexual, labour or other exploitation. Movement is not always necessary for exploitation to occur.

Financial exploitation can include forcing or manipulating children to move money, use bank accounts, commit fraud, incur debt or surrender earnings or benefits.

Where indicators suggest trafficking or modern slavery, the DSL will make or support appropriate child-protection referrals and consider the National Referral Mechanism. Specialist support, including Independent Child Trafficking Guardian arrangements where applicable, will be considered.

30. Serious violence, weapons, child abduction and community safety

Staff must report concerns about weapons or serious violence to the DSL immediately. The DSL will assess risk to the child, other pupils and adults and put in place proportionate safety and support plans.

- increased absence or exclusion;
- association with offending peers or adults;
- unexplained injuries;
- significant decline in performance;
- unexplained gifts or possessions;
- threats, debt or fear; and
- reports of weapons or violence in locations where children congregate.

30.1 Child abduction and community safety

Staff will teach age-appropriate community-safety messages and act on concerns about attempted abduction, suspicious adult approaches, unsafe travel arrangements or local risks. Serious incidents will be reported to police and parents and considered for wider safeguarding action.

31. Domestic abuse and Operation Encompass

Domestic abuse may include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological or emotional abuse. Children can be victims in their own right through seeing, hearing or experiencing the effects of domestic abuse.

Teenage relationship abuse may include physical, sexual or emotional abuse, coercive control and stalking.

31.1 Operation Encompass

The School will respond promptly to police notifications under Operation Encompass/local domestic-abuse notification arrangements. Information will be shared only with staff who need it to support the child. The DSL will consider whether further safeguarding action is required.

32. Homelessness and temporary accommodation

Homelessness and insecure or temporary accommodation can create safeguarding risks through instability, overcrowding, poverty, disrupted attendance, unsafe adults, transport difficulties and loss of support networks.

The School will respond to relevant notifications from housing authorities and other agencies, assess impact on the child, support attendance and welfare and share information where necessary to safeguard.

33. Honour or faith-based abuse, FGM and forced marriage

Honour or faith-based abuse can encompass practices used to control behaviour within families or communities to protect perceived honour, faith or reputation. It can include FGM, forced marriage and other forms of abuse.

33.1 Female genital mutilation

FGM is illegal and a form of child abuse. Concerns that a girl may be at risk must be reported to the DSL immediately. Teachers have a separate statutory duty to report to police where, in the course of their professional duties, they discover that an act of FGM appears to have been carried out on a girl under 18. The DSL should also be informed.

33.2 Forced marriage

A forced marriage is one in which one or both people do not consent and pressure or abuse is used. Concerns must be reported promptly to the DSL. Staff must not contact family members or attempt mediation where doing so may increase risk.

34. Preventing radicalisation and Channel

The School will fulfil the Prevent duty and protect children from being drawn into terrorism. Staff will be alert to changes in behaviour, relationships, online activity or language that may indicate vulnerability to radicalisation, while avoiding stereotyping.

Concerns must be reported to the DSL/Prevent Lead. The DSL will consider local Prevent Hub advice and Channel referral. While a Channel referral is being assessed, new or further relevant information will be passed promptly to the police/Channel process.

35. Cybercrime

Children with particular skills or interests in computing may become involved in cyber-dependent crime, such as unauthorised access, malware or denial-of-service activity. Staff should distinguish healthy technical curiosity from concerning behaviour and seek specialist safeguarding/police advice where necessary.

The School will provide positive pathways for pupils with strong technical interests and will not treat all experimentation as criminal; however, deliberate harmful or illegal activity will be addressed.

36. Children and the court system

Children may be required to give evidence or may be affected by family or criminal court proceedings. Court involvement can create anxiety, divided loyalties and safeguarding risks. The School will provide appropriate pastoral support, maintain confidentiality and follow lawful court orders and safeguarding advice.

37. LGB children and children questioning their gender

37.1 LGB children

LGB children and children perceived to be LGB can be particularly vulnerable to discriminatory bullying and abuse. Staff will provide safe opportunities to speak, challenge discrimination and consider additional safeguarding support.

37.2 Children questioning their gender

The School will respond patiently, sensitively and individually, with safeguarding and welfare as primary considerations. Staff will consider mental health, psychosocial needs, relationships and discriminatory bullying and will involve the DSL where safeguarding issues arise.

The School will not initiate social transition. Where a child or parent requests changes or support relating to social transition, the School will follow current KCSIE/statutory guidance, involve parents as required unless there is a safeguarding reason not to do so, and keep the approach under review.

Safeguarding records will accurately record biological sex while also recording names or other information necessary to support the child safely. Toilets, changing and sport will be managed in accordance with current legal and statutory guidance, with privacy, dignity, safety and the rights of all children considered. Bullying and harassment will be addressed.

38. Alternative provision, external providers, sport and educational visits

38.1 Alternative provision

The School retains safeguarding responsibility when it places a pupil in alternative provision. Before placement it will undertake due diligence, understand the provider's safeguarding arrangements, share relevant information and ensure any risk assessment or safety plan is in place. Attendance, welfare and suitability will be monitored and reviewed.

38.2 External providers and clubs

External coaches, peripatetic staff, clubs and providers working with Mount pupils are subject to proportionate safeguarding assurance, safer recruitment and supervision requirements.

38.3 Sport and swimming

Sport and swimming arrangements will consider supervision, changing, privacy, transport, medical/SEND needs, adult positions of trust, physical contact and the management of allegations or concerns.

38.4 Educational visits and host arrangements

Safeguarding forms part of educational-visit planning. Risk assessments will consider supervision, transport, accommodation, overnight arrangements, personal care, medical needs, online contact and any host-family arrangements. Appropriate safer-recruitment and regulated-activity requirements will be applied.

39. Visiting speakers and visitors

Visitors must follow School signing-in, identification, supervision and safeguarding procedures. Visiting speakers will be subject to appropriate checks and risk assessment so that the School does not provide a platform for unlawful extremist or otherwise harmful material.

The level of DBS or other check depends on the role and whether the activity is regulated activity. A DBS check will not be sought merely because a person visits the School where there is no legal eligibility or safeguarding need.

40. Reasonable force, restrictive intervention and seclusion

Any use of reasonable force or restrictive intervention must be lawful, necessary, proportionate and used for no longer than required. Force must never be used as punishment.

Staff must consider age, SEND, medical conditions, communication, trauma and other vulnerabilities. Incidents must be recorded and reported in accordance with the School's procedures and the Independent School Standards, including the new 2026 requirements concerning records and reporting of restrictive interventions and seclusion.

Where an incident raises a safeguarding concern, causes injury, involves an allegation or forms part of a pattern, it must be reported to the DSL and considered under safeguarding procedures.

41. EYFS-specific safeguarding arrangements

This policy applies in full to the EYFS. The School will also comply with the current EYFS safeguarding and welfare requirements.

- babies and young children may be unable to communicate concerns verbally, so staff must be attentive to behaviour, attachment, injury, feeding, sleep and developmental presentation;
- intimate care and nappy changing must protect dignity and safety and follow agreed procedures;
- sleep arrangements must be safe and monitored in accordance with current EYFS guidance;
- food preparation, weaning, allergies and choking risks must be managed safely;
- medication and medical incidents must be recorded and safeguarding implications considered;
- personal mobile phones, cameras and image-capable wearables are controlled;
- staff suitability and allegations are managed under the same KCSIE thresholds, with Ofsted notification where required;
- information from parents, previous settings, health and other agencies is considered at admission and transition; and
- where behaviour or needs create risk, safeguarding, SEND, Equality Act reasonable adjustments and multi-agency support are considered together.

41.1 Ofsted notification

The School will make required EYFS notifications to Ofsted within statutory timescales, including notifications relating to serious accidents, injuries, deaths and allegations of serious harm or abuse where the EYFS framework requires this.

42. Welfare, health and safety and premises-related safeguarding

Safeguarding includes safe premises, supervision, first aid, medical arrangements, fire safety, educational visits, transport, site security and management of adults on site.

Where adults live on or have private residential access to School premises, the School will assess safeguarding risks including resident checks, access between accommodation and pupil areas and access by family members or visitors.

Health and safety concerns that create a risk of harm to children must be escalated promptly and not treated as separate from safeguarding merely because they arise from premises or operational matters.

43. Monitoring, quality assurance and inspection readiness

The School will not judge safeguarding effectiveness by the existence of policies alone. Leaders and the Director will test implementation and impact.

- sample safeguarding case records and referral decisions;
- review whether concerns are acted on promptly and whether escalation occurs where needed;
- review allegations and low-level concerns for appropriate thresholds and patterns;
- audit safeguarding training and staff understanding;
- audit the Single Central Record and recruitment files;
- review child-on-child incidents, HSB, bullying and serious-violence themes;
- review attendance and children missing education;
- review filtering and monitoring effectiveness at least annually;
- seek pupil, staff and parent views about safety and reporting;
- review complaints for safeguarding themes;
- review external-provider and alternative-provision arrangements;
- ensure EYFS safeguarding and welfare requirements are implemented; and
- record actions arising from safeguarding reviews and check completion.

For Ofsted inspection, the School will be able to provide secure access to the SCR, relevant DBS/volunteer records, safeguarding referral information and a sample of casework demonstrating decision-making, referral, support and resolution. Leaders will be able to explain practice and its impact, not simply point to written policy.

44. Related policies and reference framework

44.1 Related School policies

- Safer Recruitment Policy
- Staff Disciplinary and Conduct Policy / Code of Conduct
- Online Safety Policy and Acceptable Use arrangements
- Mobile Phone Policy and EYFS Mobile Devices Policy
- Attendance Policy
- Behaviour and Anti-Bullying Policies
- Suspension and Permanent Exclusion / Nursery Placement arrangements
- Whistleblowing Policy
- Admissions Policy
- Missing Child Policy
- SEND Policy
- Supporting Pupils with Medical Conditions / Medication procedures
- Intimate Care procedures
- Health and Safety Policy
- Complaints Policy
- Data Protection Policy and privacy notices
- Educational Visits / Swimming / external provider procedures

44.2 Core external reference documents

- Keeping Children Safe in Education 2026 – Department for Education
- Working Together to Safeguard Children – current edition
- Independent School Standards Guidance – Department for Education, April 2026
- Education (Independent School Standards) Regulations 2014, as amended
- Ofsted Non-association Independent School Inspection Toolkit and Operating Guide – September 2026
- EYFS statutory framework – current edition
- Prevent duty guidance – current edition
- Working Together to Improve School Attendance – current edition
- DfE mobile phones in schools statutory guidance – current edition
- Information sharing advice for safeguarding practitioners – current edition

Appendix A – Staff one-page response guide

Situation	What you do
Child in immediate danger	Call 999 / Children's Social Care. Protect the child. Inform DSL/DDSL as soon as possible. Record.
Concern about child	Tell DSL/DDSL immediately and record on safeguarding system. Anyone can refer directly.
Disclosure	Listen; take seriously; no confidentiality promise; no leading questions; record child's words; tell DSL.
Child-on-child / HSB	Tell DSL immediately. Preserve safety. Do not dismiss as banter.
Weapon / serious violence	Tell DSL immediately; urgent risk assessment; police/social care as appropriate.
Adult may meet harm threshold	Tell Headteacher immediately. Headteacher considers LADO. Do not investigate first.
Concern about Headteacher	Tell Director immediately. Do not tell Headteacher first.
Low-level adult concern	Tell Headteacher/DSL same day; written low-level record.
Concern not acted on	Escalate. You may refer directly or use whistleblowing route.

Appendix B – Adult concern decision route

1. A concern about an adult is reported immediately.
2. If the concern is about the Headteacher, report to the Director. Otherwise report to the Headteacher/case manager.
3. Case manager considers whether the harm threshold may be met.
4. If yes or uncertain: consult/refer to LADO and follow Part Four procedures. Avoid substantive internal investigation before advice.
5. If clearly below harm threshold: manage under low-level concerns procedure.
6. Record decision, rationale, action and outcome.
7. Review for patterns and wider safeguarding/cultural issues.
8. Consider DBS/TRA referral duties where employment/regulated-activity criteria are met.

Appendix C – Safeguarding transfer checklist

- Confirm destination setting and DSL contact details.
- Review safeguarding file for accuracy, chronology and current status.
- Prepare a clear summary of current concerns, relevant context, ongoing support and key risks.
- Distinguish historic information from current risk.
- Where immediate risk/support exists, contact receiving DSL before the child arrives.
- Transfer file securely and separately from the main pupil file within KCSIE timescales.
- Obtain and record confirmation of receipt.
- Record what was shared, with whom, when and why.
- Ensure any outstanding multi-agency actions are handed over directly.
- Retain records in accordance with legal and School retention requirements.

Appendix D – Annual safeguarding assurance checklist

- Policy reviewed against latest KCSIE, Working Together, ISS guidance and local procedures.
- Named DSL/DDSL/Director details correct.
- Duty & Advice, LADO, Prevent and national contact details verified.
- All staff have read KCSIE Part One and confirmation recorded.
- DSL/DDSL training current; annual updates evidenced.
- Staff safeguarding training and induction records current.
- SCR audited and safer-recruitment files sampled.
- Volunteer regulated-activity roles reviewed under September 2026 rules.
- Filtering and monitoring effectiveness reviewed and annual checks logged.
- Online Safety and Mobile Phone policies aligned.
- Child-on-child/HSB data and hotspot analysis reviewed.
- Low-level concerns and adult allegations reviewed for patterns and correct thresholds.
- Attendance/CME safeguarding links reviewed.
- Alternative provision/external providers audited.
- Safeguarding transfer records sampled.
- EYFS safeguarding, sleep, food, intimate-care and mobile-device arrangements reviewed.
- Pupil voice confirms children know how to report and feel adults respond.
- Director challenge, review and actions recorded.
- Website safeguarding policy is current and accessible.