Safeguarding Policy

Based on guidance issued by the Secretary of State, the latest of which is Keeping Children Safe in Education 2026 , Department for Education (DfE),

This policy includes our school's procedures for dealing with allegations of abuse against staff.

OUR VISION

Our vision is to provide pupils with the confidence, skills and ambition to achieve a successful and productive life. We aim to ensure they leave the school with a 'new day, new opportunity' ethos and are capable of becoming positive members of their communities. To do this, we have 3 principles that underpin our policies, practices and everything we do:

Everyone can learn, achieve and has the potential to be successful

Positive relationships are key to success and are underpinned by mutual trust, respect and caring for one anotherWe have high expectations in everything we do

Policy owner	WhiteTrees School	**Last review**	August 2026
Date Created	October 2018	**Next review**	August 2027

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Request support from us: Finding the right level of support for children and young people - Essex County Council

The Essex Education Safeguarding Team consists of:

Jo Barclay, Head of Education Safeguarding and Wellbeing
Matthew Lewis, Senior Education Safeguarding Adviser
Alex Darvill – Senior Education Safeguarding Adviser

Introduction

WhiteTrees Independent School is committed to safeguarding and promoting the welfare of all pupils, particularly those who are most vulnerable, and expects all staff, volunteers, governors, contractors and visitors to share this commitment.
Our safeguarding culture is underpinned by the principle of **"Think the Unthinkable"**, ensuring that all concerns, however small, are recognised, recorded and responded to appropriately.

- Our philosophy is to always **"Think the Unthinkable."**
- Staff are expected to demonstrate professional curiosity and maintain an attitude of **"it could happen here"** when considering the welfare of any child.
- All visitors to the school will be accompanied by an authorised member of staff unless appropriate safeguarding checks have been completed.
- If you have a safeguarding or child protection concern, or a child makes a disclosure, this must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) using the school's safeguarding reporting procedures and recorded on CPOMS without delay.
- Anyone can make a referral to Children's Social Care if they believe a child is at risk of significant harm. Staff should inform the DSL as soon as possible unless doing so would place the child at further risk.
- The School recognises that safeguarding responsibilities extend beyond the physical school environment and include online activity, the use of digital technology, social media, mobile devices and emerging technologies such as **Generative Artificial Intelligence (AI)**. Staff must remain vigilant to risks including AI-generated content, manipulated or synthetic media (deepfakes), online exploitation, cyber-enabled abuse and other emerging safeguarding threats.

Our policy applies to all staff, governors, volunteers, contractors, agency staff and anyone working on behalf of WhiteTrees Independent School. It reflects statutory guidance issued by the Department for Education together with local safeguarding arrangements across Hertfordshire and Essex.
We are committed to ensuring that parents and carers understand our statutory responsibilities for safeguarding and child protection through the publication of this Safeguarding and Child Protection Policy on the school website and through ongoing communication with families.
This policy has been developed in accordance with:

- **Keeping Children Safe in Education 2026 (DfE)**
- **Working Together to Safeguard Children**
- **The Education and Training (Welfare of Children) Act 2021**
- Relevant legislation relating to safeguarding, online safety, data protection, equality and children's welfare.

Safeguarding is embedded throughout every aspect of school life. WhiteTrees is committed to creating a culture where children feel safe, respected and listened to, enabling them to achieve the best possible outcomes while protecting them from abuse, neglect, exploitation and harm in all its forms. .

Our Child Protection Policy

There are six main elements to our policy:

- Providing a safe environment in which children can learn, develop and thrive.
- Ensuring we practice safer recruitment by checking the suitability of staff, volunteers and contractors to work with children.
- Developing and implementing robust procedures for identifying, recording and responding to concerns, allegations or suspected cases of abuse, neglect and exploitation.
- Supporting pupils who have experienced abuse, neglect or exploitation in accordance with their Child Protection Plan, Child in Need Plan or other agreed safeguarding arrangements.
- Raising awareness of safeguarding, promoting a culture of vigilance and equipping pupils with the knowledge, confidence and skills to keep themselves safe.
- Working in partnership with parents, carers, safeguarding partners and other agencies to promote the best interests of every child.

WhiteTrees Independent School recognises that, because of our daily contact with children, staff are uniquely placed to identify early indicators of abuse, neglect,

exploitation and emerging safeguarding concerns. All staff maintain an attitude of **"it could happen here"**, remain professionally curious, and understand that safeguarding is everyone's responsibility. WhiteTrees Independent School will therefore:

- Establish and maintain an environment where children feel safe, secure, respected and are encouraged to speak openly, knowing they will be listened to and taken seriously.
- Ensure every child knows there are trusted adults within the school whom they can approach if they are worried or require support.
- Develop and maintain effective working relationships with parents, carers, safeguarding partners and external agencies. Deliver an age-appropriate safeguarding curriculum through Relationships, Sex and Health Education (RSHE), Personal, Social, Health and Economic (PSHE) education and other curriculum opportunities.
- Support pupils to recognise and manage risks associated with:
    - online safety
    - child sexual exploitation (CSE)
    - child criminal exploitation (CCE)
    - grooming
    - radicalisation
    - county lines
    - missing education
    - cybercrime
    - harmful online challenges
    - the sharing of nude and semi-nude images ▪ online scams and financial exploitation.
    -
- Educate pupils about the safe and responsible use of digital technology, including **Generative Artificial Intelligence (AI)**, ensuring they understand the risks associated with AI-generated content, manipulated images, **deepfakes**, misinformation, online impersonation and AI-enabled exploitation.
- Promote healthy, respectful relationships and educate pupils about domestic abuse, coercive and controlling behaviour, harmful sexual behaviour, misogyny, Misandry, honour-based abuse, female genital mutilation (FGM), forced marriage and child-onchild abuse.
- Help pupils recognise how peer pressure, coercion, online influence and manipulation may affect their behaviour and decision-making.
- Act promptly to address concerns relating to serious violence, weapon carrying, gang involvement, knife crime, child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence.

- Take all reasonable steps to minimise risks to children's welfare and respond swiftly and proportionately where concerns arise.
- Maintain robust safeguarding arrangements that are embedded throughout the daily life and culture of the school.
- Promote pupils' physical health, emotional wellbeing and mental health, recognising that mental health concerns may become safeguarding concerns where they place a child at risk.
- Promote safe professional practice and challenge unsafe practice wherever it occurs.
- Operate clear procedures for managing allegations and low-level concerns relating to staff, volunteers and contractors in accordance with **Keeping Children Safe in Education 2026** and local multi-agency safeguarding procedures.
- Provide appropriate first aid and ensure the needs of children with medical conditions are fully supported.
- Maintain a secure school environment through appropriate site security and safeguarding procedures.
  Address risks relating to drugs, alcohol, substance misuse and exploitation.
  Work collaboratively to safeguard children who are missing from education, missing from home or care, or at risk of exploitation.
- Ensure safeguarding responsibilities extend beyond the school premises to educational visits, off-site provision, alternative provision, vocational placements, online learning environments and all school-related activities.
- Operate effective **online filtering and monitoring systems**, undertaking a **formal review at least annually**, including testing filtering and monitoring arrangements across all internet-connected devices. Records of these reviews will be maintained and reported through the school's governance arrangements.
- Maintain a clear **Mobile Phone Policy** setting out expectations for the safe use of mobile devices by pupils, staff and visitors, recognising that mobile technology can increase safeguarding risks where not appropriately managed.

All educational visits, off-site learning and alternative provision placements are subject to robust risk assessments to ensure pupils' social, emotional, behavioural, medical and educational needs are appropriately considered, with safeguarding remaining paramount throughout.

WhiteTrees will follow the procedures established by Hertfordshire and Essex safeguarding partnerships and the statutory guidance contained within Keeping Children Safe in Education 2026 by ensuring that we:

- Appoint a suitably trained Designated Safeguarding Lead (DSL), who is a member of the senior leadership team, together with appropriately trained Deputy Designated Safeguarding Leads.
- Clearly define the responsibilities of the DSL within their job description in accordance with **KCSIE 2026 Annex B**.
- Appoint a nominated Safeguarding Governor with strategic responsibility for safeguarding oversight.
- Appoint a Designated Teacher for Children Looked After and Previously Looked After Children.
- Ensure all staff, governors, volunteers, agency staff and contractors know who the DSL and DDSLs are and understand how to contact them.
- Ensure all staff understand their safeguarding responsibilities, including recognising abuse, neglect, exploitation and emerging safeguarding risks, and know how to make timely referrals.
- Ensure all staff understand the local early help and Family Help processes and their role in identifying children who may benefit from additional support
- Maintain a strong whistleblowing culture that enables concerns about unsafe practice to be raised without fear of detriment.
- Maintain an effective complaints procedure for children, parents and carers. Ensure parents and carers understand the school's safeguarding responsibilities through publication of this policy and ongoing communication. Notify Children's Social Care promptly where children subject to statutory safeguarding plans are absent without explanation.
- Work collaboratively with safeguarding partners and attend child protection conferences, strategy discussions and review meetings where required.
- Maintain accurate, contemporaneous safeguarding records using CPOMS, ensuring actions, decisions and outcomes are clearly documented.
- Transfer safeguarding records securely and without delay when pupils move to another educational setting.
- Maintain effective procedures for responding to children missing education, missing from home or care, and children at risk of exploitation.
- Follow safer recruitment procedures at all times.
- Apply confidentiality appropriately whilst recognising that safeguarding concerns must always be shared where necessary to protect children.

- Escalate concerns where there is disagreement or dissatisfaction with the response from partner agencies, ensuring that children's welfare remains the overriding priority.

Supporting Children

We recognise that children who have experienced abuse, neglect, exploitation, trauma or who have witnessed violence may find it difficult to develop a positive sense of self-worth. They may experience feelings of helplessness, fear, humiliation or self-blame. For many children, school may be the only stable, secure and predictable environment in their lives. Their behaviour may present as challenging, disruptive, withdrawn, anxious or emotionally dysregulated.

We also recognise that some children are more vulnerable to safeguarding concerns than others, including children with Special Educational Needs and Disabilities (SEND), **Children Looked After and Previously Looked After Children (CLA/ PLAC)**, young carers, children with medical conditions, children who require mental health support and children who have, or have previously had, a social worker. We recognise that safeguarding and emotional wellbeing are closely linked however, not all mental health concerns are safeguarding concerns. Staff will always consider whether changes in a child's presentation may indicate abuse, neglect, exploitation or other safeguarding risks and will respond appropriately. WhiteTrees Independent School will endeavour to support every pupil by:

- Delivering a broad, balanced and age-appropriate curriculum that equips pupils with the knowledge, confidence and skills to recognise risk, seek help and keep themselves safe both offline and online.
- Maintaining a positive, inclusive and nurturing school ethos where every pupil feels valued, respected, listened to and supported.
- Implementing the school's Behaviour Policy, Anti-Bullying Policy, Online Safety Policy and Child-on-Child Abuse Policy, ensuring they remain fully aligned with national legislation and local safeguarding procedures.
  Helping pupils understand healthy relationships, consent, online safety, digital citizenship and the risks associated with emerging technologies, including

Generative Artificial Intelligence (AI), AI-generated content, manipulated media (deepfakes) and online exploitation.

- Ensuring pupils understand that unacceptable behaviour will always be addressed fairly and proportionately whilst maintaining a restorative, trauma-informed approach that supports learning, wellbeing and positive outcomes.
- Where reasonable force and restrictive interventions are required, The school will ensure this is in line with policies. Safeguarding considerations, including the individual child's vulnerabilities and risks, will be incorporated into relevant risk assessments and support plans.
- Providing access to trained Mental Health First Aiders, trusted adults, pastoral support and safeguarding staff whenever required.
- Working collaboratively with Children's Social Care, Family Help Services, Educational Psychology, Health Services, Behaviour Support Services and other relevant agencies to ensure children receive coordinated support appropriate to their needs.
- Ensuring safeguarding information is transferred securely and without delay when pupils move to another educational setting, including children subject to Child Protection Plans, Child in Need Plans or where wider safeguarding concerns exist.
- Recognising and responding appropriately to the additional vulnerabilities experienced by children with SEND by ensuring timely access to identified key adults, reasonable adjustments and appropriate safeguarding support.
- Promoting attendance, emotional wellbeing and positive relationships, recognising that persistent absence or changes in presentation may indicate an underlying safeguarding concern.
- Providing appropriate support following safeguarding incidents, recognising that recovery is often a gradual process requiring coordinated intervention and ongoing pastoral care.
- Whitetrees also recognises that children may cause harm to parents or caregivers. Where concerns arise about child-to-parent or caregiver abuse, staff should remain professionally curious, inform the DSL and consider safeguarding, Family Help and/or other appropriate support in line with the circumstances.

Safe Staff & Supporting Staff

The Leadership Team and Governing Body recognise that creating and maintaining a strong safeguarding culture depends upon recruiting, training and supporting staff appropriately. WhiteTrees Independent School will therefore:

- Ensure that safer recruitment practices are fully compliant with **Keeping Children Safe in Education 2026**, relevant employment legislation and WhiteTrees Group recruitment procedures.
- Ensure all staff involved in recruitment have completed accredited Safer Recruitment training and receive appropriate refresher training.
- Undertake all statutory pre-employment checks, references, identity verification, qualification checks, prohibition checks, **appropriate online searches of shortlisted candidates**, and Disclosure and Barring Service (DBS) checks before employment commences, in accordance with Keeping Children Safe in Education 2026.Maintain an accurate and regularly reviewed Single Central Record (SCR) in accordance with statutory requirements.
- Provide all staff with clear guidance regarding professional boundaries through the Staff Code of Conduct, Acceptable Use Policy, Online Safety Policy and Low-Level Concerns Policy.
- Ensure newly appointed staff complete a comprehensive safeguarding induction before working unsupervised with pupils.
- Respond promptly and appropriately to all allegations and low-level concerns relating to staff, volunteers, contractors and agency workers in accordance with KCSIE 2026 and local safeguarding procedures.
- Recognise that safeguarding work can be emotionally demanding and ensure appropriate wellbeing support, supervision and professional guidance are available to staff where required.
- Provide advice and support through the DSL, Head Teacher, Executive Leadership Team, Director of Children's Services, Safeguarding Governor, Human Resources and external safeguarding professionals where appropriate.
- Ensure safeguarding remains a standing item within induction, supervision, appraisals and ongoing professional development.
- The school's safeguarding arrangements apply to staff, supply teachers, trainee teachers, volunteers, contractors and other adults working on behalf of the school. Where staff are supplied by a third-party organisation, WhiteTrees will work collaboratively with the provider and retain responsibility for ensuring that safeguarding concerns and allegations are appropriately managed, including liaison with the LADO where required.

Related Policies

This policy should be read alongside the following WhiteTrees policies and statutory guidance:

- Anti-Bullying Policy
- Attendance Policy
- Behaviour Policy
- Child-on-Child Abuse Policy
- Online Safety Policy
- Filtering and Monitoring Policy
- Mobile Phone Policy
- Acceptable Use Policy
- Relationships, Sex and Health Education (RSHE) Policy
  Curriculum Policy
- Equality Policy
- First Aid and Medication Policy
- Health and Safety Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Low-Level Concerns Policy
- Safer Recruitment Policy
- Risk Assessment Policy
- "Who We Are and What We Do" at WhiteTrees School

All adults working with, or on behalf of, WhiteTrees Independent School are expected to understand, follow and promote these policies at all times.

Roles & Responsibilities

All Staff and Volunteers

Safeguarding and promoting the welfare of children is everyone's responsibility. Every member of staff, volunteer, governor, contractor, agency worker and visitor who comes into contact with children has an important role in protecting children from harm and promoting their welfare.

At WhiteTrees Independent School, we are committed to safeguarding and promoting the welfare of all pupils, particularly those who are most vulnerable. Our safeguarding culture is built upon the principle of **"Think the Unthinkable"**,

encouraging professional curiosity, early intervention and a consistent attitude that **"it could happen here."**
All staff must understand both their own safeguarding responsibilities and those of colleagues. They must know how to recognise abuse, neglect, exploitation and emerging safeguarding risks, and understand how to respond promptly and appropriately.

WhiteTrees Independent School operates a clear safeguarding leadership structure across all school sites.

Head of Safeguarding Lead DSL Holds overall strategic and operational responsibility for safeguarding and child protection across WhiteTrees Independent School. The Lead DSL provides oversight, quality assurance and consistency across all sites and retains overall accountability for the school's safeguarding arrangements.

Site DSLs, Deputy DSLS Provide day-to-day safeguarding leadership within their designated site, receive and respond to safeguarding concerns, maintain oversight of CPOMS records and liaise with the Lead DSL to ensure appropriate action, recording and escalation.

All Staff: All staff, volunteers, contractors and agency workers are responsible for recognising and reporting safeguarding concerns immediately. Concerns must be reported to the DSL/DDSL and recorded on CPOMS without delay.

Delegation of safeguarding functions to Site DSLs/DDSLs does not remove the Lead DSL's overall responsibility for ensuring that effective safeguarding arrangements are in place.

All safeguarding leaders have completed advanced safeguarding training and Safer Recruitment training and undertake regular statutory refresher training alongside continuous professional development throughout the year.

Every member of staff contributes to maintaining a safe learning environment by:

- Remaining professionally curious.
- Recognising early indicators of abuse, neglect and exploitation.
- Recording safeguarding concerns promptly and accurately on CPOMS.
- Reporting concerns immediately to the DSL or DDSL.

- Supporting multi-agency safeguarding arrangements where appropriate.
- Planning learning activities that take account of pupils' individual vulnerabilities and risk assessments.
- Promoting online safety, including awareness of emerging technologies such as **Generative AI**, deepfakes, online grooming and cyber-enabled abuse.
- Helping pupils understand how to stay safe both online and offline.
- Supporting positive attendance, wellbeing and engagement.

WhiteTrees provides regular opportunities for parents and carers to access safeguarding information through coffee mornings, newsletters, meetings and the school website. Pupils have access to trusted adults, Mental Health First Aiders, pastoral staff and safeguarding professionals whenever required.

We recognise that children who currently have, or have previously had, a social worker may face increased safeguarding risks. The DSL works closely with Children's Social Care and safeguarding partners to ensure timely information sharing, effective planning and coordinated support.

WhiteTrees also recognises the significant impact of trauma and adverse childhood experiences. Educational provision is therefore planned using trauma-informed principles, ensuring safeguarding, emotional wellbeing and positive relationships remain central to every pupil's educational experience.

Safeguarding Training

WhiteTrees Independent School is committed to ensuring that all staff receive effective safeguarding training and regular updates so that they can fulfil their statutory safeguarding responsibilities confidently and consistently.

All staff are made aware of the school's safeguarding systems as part of their induction. This includes, but is not limited to:

The Safeguarding and Child Protection Policy.

- The Staff Code of Conduct.
- The Behaviour Policy.
- The Online Safety Policy.
- The Acceptable Use Policy.
- The Low-Level Concerns Policy.
- The Whistleblowing Policy.
- The identity and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs).
- The procedures for recording concerns using **CPOMS**.
- **Keeping Children Safe in Education 2026** and other relevant safeguarding legislation and statutory guidance.

All new members of staff, volunteers, agency staff and contractors complete a safeguarding induction before commencing unsupervised work with pupils.
Whole-school safeguarding training is delivered annually and updated whenever statutory guidance changes. Additional safeguarding briefings and updates are provided throughout the year to ensure staff remain aware of emerging safeguarding issues, changes in legislation and local safeguarding procedures.
Training includes, but is not limited to: • Child

protection and safeguarding responsibilities.

- Universal services and community-based early help, including targeted Family Help • Child-on-child abuse.
- Online safety.
- Harmful sexual behaviour.
- Prevent and radicalisation.
- Mental health and emotional wellbeing.
- Children Missing Education.
- County Lines and criminal exploitation.
- Child sexual exploitation.
- Domestic abuse.
- Serious violence.
- Professional curiosity.
- Emerging safeguarding risks, including **Generative Artificial Intelligence (AI)**, AIgenerated content, deepfakes and online manipulation.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads receive advanced safeguarding training appropriate to their role and undertake regular updates in accordance with statutory guidance. WhiteTrees also ensures all safeguarding leaders receive ongoing professional development throughout the year to maintain current knowledge and practice.
All staff receive training on the effective use of CPOMS, including how to record concerns accurately, objectively and in a timely manner.
Staff understand the referral pathways into Children's Social Care and Family Help Services, together with their responsibilities when contributing to statutory assessments under the Children Act 1989 and Children Act 2004.
All staff know how to respond when a child makes a disclosure of abuse or neglect. Staff understand that they must:

- listen carefully
- reassure the child appropriately
- never ask leading questions
- never promise confidentiality
- record concerns factually
- report concerns immediately to the DSL or DDSL.

Staff Responsibilities

Safeguarding is everyone's responsibility.
Every member of staff has a vital role in identifying concerns early, protecting children from harm and promoting their welfare.
To achieve this, all staff will

- Establish and maintain an environment where children feel safe, respected and listened to.
- Ensure pupils know there are trusted adults within school whom they can approach if they have concerns.
- Deliver learning opportunities that help pupils assess and manage risk, both online and offline.
- Attend mandatory safeguarding training and maintain an up-to-date understanding of safeguarding legislation and emerging risks.
- Maintain an attitude of **"it could happen here"** and exercise professional curiosity at all times.
- Record safeguarding concerns promptly, accurately and objectively using CPOMS on the same day wherever possible.
- Inform the DSL immediately of safeguarding concerns or contact a Deputy DSL if the DSL is unavailable.
- Refer directly to Children's Social Care or the Police where a child is at immediate risk of significant harm and safeguarding staff cannot be contacted.
- Follow the school's procedures for managing allegations or low-level concerns relating to staff.
- Follow the procedures established by the local safeguarding partnership and statutory guidance contained within **Keeping Children Safe in Education 2026**.
- Support children subject to Child Protection Plans, Child in Need Plans, Education, Health and Care Plans (EHCPs), Personal Education Plans (PEPs) and other safeguarding arrangements.

Treat safeguarding information confidentially whilst recognising that safeguarding information must be shared appropriately to protect children.

- Notify the DSL immediately where a child subject to safeguarding arrangements is absent without explanation.
- Work collaboratively with partner agencies to support children and families.
- Know the identity and contact details of the DSL and DDSLs.
- Be familiar with the Safeguarding and Child Protection Policy, Behaviour Policy, Staff Code of Conduct, Online Safety Policy and procedures relating to Children Missing Education.
- Promote safe and responsible use of technology, recognising risks associated with social media, mobile devices, **Generative AI**, deepfakes and other emerging online harms.

Leadership Team Responsibilities

The Leadership Team is responsible for ensuring safeguarding remains central to the school's culture and strategic development. Senior leaders will:

- Promote effective multi-agency working in accordance with **Working Together to Safeguard Children** and local safeguarding partnership arrangements.
- Ensure timely access to Universal services and community-based early help, including targeted Family Help, where additional needs are identified
- Ensure all staff, governors, volunteers, contractors and agency workers receive safeguarding training appropriate to their role.
- Ensure staff understand the indicators of abuse, neglect, exploitation and emerging safeguarding concerns, including online harms and AI-enabled abuse.
- Support Children's Social Care through strategy meetings, Child Protection Conferences, Core Groups and other safeguarding processes.
- Maintain the Single Central Record and oversee safer recruitment practices.
- Provide professional advice and safeguarding support to all members of staff.
- Ensure allegations and low-level concerns relating to staff are managed promptly in accordance with **Keeping Children Safe in Education 2026** and local authority procedures.
- Recognise transferable risk when considering concerns relating to staff behaviour outside the workplace.
- Maintain robust systems for pupils to report safeguarding concerns, including anonymous reporting mechanisms where appropriate.
- Ensure the school's filtering and monitoring systems are reviewed at least annually and that appropriate records of these reviews are maintained.

- Promote a culture where safeguarding concerns are welcomed, acted upon promptly and continuously reviewed.

Teachers (Including ECTs) and Headteachers – Professional Duty

The Teachers' Standards require all teachers, including Early Career Teachers (ECTs), to safeguard children's wellbeing and maintain public trust in the teaching profession. WhiteTrees expects all teachers to:

- safeguard and promote the welfare of every child
- maintain high standards of professional conduct
- understand and fulfil their statutory safeguarding responsibilities
- contribute to creating a safe, inclusive and respectful learning environment.

The Designated Teacher will continue to promote the educational achievement and wellbeing of Children Looked After (CLA) and Previously Looked After Children (PLAC), ensuring that their progress and achievements are recognised and celebrated through Personal Education Plans (PEPs), statutory reviews and wider school life.

Safeguarding posters displaying the names, photographs and contact details of the DSL and DDSLs are displayed prominently throughout both school sites so that pupils, staff and visitors know how to access safeguarding support quickly.

Designated Safeguarding Lead (DSL)

WhiteTrees Independent School has appointed Lukas Bradon :**Head of Safeguarding as the overall Designated Safeguarding Lead (DSL)**, with overall strategic and operational responsibility for safeguarding and child protection across the school. The Head of Safeguarding is a senior member of the Leadership Team and has the appropriate authority, status, time, funding, training and resources to carry out the duties of the role effectively. Due to the school's split-site structure, **each school site has an appropriately trained Designated Safeguarding Lead (Site DSL)** who is responsible for the day-to-day management of safeguarding and child protection within their designated site. Site DSLs work closely with the Head of Safeguarding and ensure that safeguarding concerns are responded to promptly, recorded appropriately and escalated where necessary.

Each site may also have an appropriately trained **Deputy Designated Safeguarding Lead (DDSL)** who supports the Site DSL and provides appropriate safeguarding cover when the Site DSL is unavailable.

The responsibilities of the Head of Safeguarding and Site DSLs are clearly defined within their respective job descriptions and are undertaken in accordance with **Keeping Children Safe in Education (KCSIE) 2026**, local safeguarding partnership procedures and statutory safeguarding legislation.

Safeguarding Leadership Structure

The Head of Safeguarding will ensure that robust safeguarding systems operate consistently across all school sites and alternative education provisions.

The school recognises the importance of effective communication between all members of staff. All safeguarding concerns must be recorded promptly using **CPOMS**, ensuring that safeguarding information is shared appropriately and acted upon without delay.

To ensure safeguarding arrangements remain effective:

A **Site DSL or appropriately trained DDSL** will always be available during normal school hours to discuss safeguarding concerns.

The Head of Safeguarding will maintain appropriate oversight and availability to support Site DSLs with safeguarding decision-making, escalation and complex concerns.

Appropriate cover arrangements will be in place whenever a Site DSL or DDSL is absent, including during educational visits, off-site activities and periods of leave.

Staff will always know who their **Site DSL and DDSL** are and how they can be contacted. Safeguarding systems, including CPOMS, will continue to be actively monitored throughout periods of absence in accordance with KCSIE 2026 requirements.

Out-of-hours safeguarding arrangements will be established where school activities continue beyond the normal school day.

The Head of Safeguarding Lead working with the Site DSL are expected to:

Manage Referrals:

- Manage and respond to all safeguarding concerns recorded on CPOMS in a timely manner.
- Make referrals to Children's Social Care, Family Help Services, the Police, Channel, Health Services and other appropriate agencies where required.
- Support staff in making safeguarding referrals where appropriate.

- Refer cases to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA) where statutory referral criteria are met.
- Maintain strategic oversight of safeguarding practice across all WhiteTrees sites.
- Meet regularly with DSLs to review safeguarding concerns, monitor actions and ensure consistency of safeguarding practice.
- Maintain oversight of all pupils attending alternative provision, vocational placements or off-site education, ensuring safeguarding responsibilities remain fully discharged.
- Monitor children identified as requiring additional safeguarding support, ensuring timely multi-agency intervention.
- Maintain oversight of safeguarding trends to inform school improvement, staff training and preventative education.

Work with Others

- Work closely with the Headteacher, Executive Leadership Team and Governing Body to ensure safeguarding remains a strategic priority.
- Liaise with Children's Social Care, Police, Health Services, Universal services including community based early help Services, family help and other safeguarding partners.
- Work closely with the Local Authority Designated Officer (LADO) in relation to allegations against adults working with children.
- Support staff through safeguarding decision-making and referral processes.
- Attend and contribute to Child Protection Conferences, Core Groups, Strategy Meetings and other multi-agency meetings.
- Ensure safeguarding information is shared lawfully, proportionately and promptly in accordance with statutory guidance.
- Promote professional curiosity and reflective safeguarding practice across the organisation.
- Use CPOMS effectively to record decisions, actions, outcomes and management oversight.
- Work collaboratively with curriculum leaders to ensure safeguarding themes are embedded throughout the curriculum, including Relationships, Sex and Health Education (RSHE), Personal, Social, Health and Economic (PSHE) education and online safety.
- Engage with pupils, staff and parents through pupil voice, supervision, staff meetings, newsletters, coffee mornings and safeguarding awareness activities to continuously improve safeguarding practice.

Undertake Training

- Complete advanced Designated Safeguarding Lead training at least every two years together with regular updates and continual professional development as required by KCSIE.
- Undertake regular safeguarding updates and continuing professional development throughout the year in line with KCSIE 2026.
- Maintain current knowledge of legislation, statutory guidance, local safeguarding procedures and emerging safeguarding risks.
- Maintain an accurate safeguarding training record for all staff, governors and volunteers.
- Monitor safeguarding training compliance and ensure refresher training is completed within required timescales.

DSL Training will enable the Designated Safeguarding Lead to

- Maintain an up-to-date understanding of safeguarding legislation and local safeguarding partnership arrangements.
- Understand Child Protection Conferences, Child in Need meetings, Strategy Meetings and statutory safeguarding processes.
- Support children with additional vulnerabilities, including children with SEND, young carers, children who have or have had a social worker, Children Looked After (CLA) and Previously Looked After Children (PLAC).
- Understand how Having caring responsibilities can impact attendance, attainment, behaviour and wellbeing. Staff should identify young carers early and consider whether additional support is required. Concerns should be considered with the DSL and SENCO
- Maintain accurate, comprehensive safeguarding records using CPOMS.
- Understand the Prevent Duty and support staff in identifying children vulnerable to radicalisation and extremism.
- Understand mandatory reporting responsibilities relating to Female Genital Mutilation (FGM).
- Promote effective online safety education.
- Understand safeguarding risks associated with, Generative Artificial Intelligence (AI) Deepfakes, manipulated media Online exploitation, Cybercrime, Harmful online challenges

Emerging technologies.

- Ensure pupils are protected whilst learning online and using digital technology.

- Oversee the school's filtering and monitoring arrangements, ensuring they remain effective.
- **Lead and document the school's annual review of filtering and monitoring systems**, reporting findings to senior leaders and governors, as required by KCSIE 2026.
- Promote a culture where children are listened to, respected and safeguarded.

Raise Awareness

- Ensure safeguarding policies are understood, implemented and reviewed regularly.
- Lead the annual review of the Child Protection and Safeguarding Policy in consultation with staff and governors.
- Ensure safeguarding remains central to the School Improvement Plan.
- Ensure safeguarding policies remain compliant with current legislation and statutory guidance.
- Ensure safeguarding information is readily available to parents and carers through the school website and other communication channels.
- Ensure all staff receive safeguarding induction before working with children.
- Promote safeguarding awareness throughout the school community through ongoing training and communication.

Child Protection Files

- Are maintained securely and confidentially using CPOMS
- Are accurate, factual and contemporaneous
- Are quality assured regularly
- Are transferred securely to a receiving school or educational provider as soon as possible following confirmation of a pupil's destination
- Are shared directly with the receiving DSL wherever possible
- Are retained in accordance with statutory data protection and safeguarding requirements.

Where pupils are subject to Child Protection Plans, Child in Need Plans or ongoing safeguarding concerns, the DSL will ensure that Children's Social Care is informed promptly of the transfer.

Availability

During term time, the Designated Safeguarding Lead or an appropriately trained Deputy Designated Safeguarding Lead will always be available during school hours to discuss safeguarding concerns. WhiteTrees will ensure that:

- appropriate DSL cover arrangements are maintained during periods of absence
- safeguarding systems remain monitored throughout the school day
- appropriate arrangements are in place for educational visits, off-site provision and extended school activities
- staff always know who is acting as DSL
- pupils have access to safeguarding support throughout the school day.

Where the DSL is unavailable for an extended period, appropriate leadership arrangements will be implemented to ensure statutory safeguarding responsibilities continue to be fully discharged in accordance with **Keeping Children Safe in Education 2026**.

Headteacher

The Headteacher alongside the Exectuvie Head Teacher has overall responsibility for ensuring that safeguarding and child protection remain central to the culture, ethos and daily practice of WhiteTrees Independent School.

The Headteacher will ensure that:

- The safeguarding and child protection policies adopted by the Governing Body are fully implemented, monitored and consistently followed by all staff, volunteers, contractors and visitors.
- The school maintains an accurate and up-to-date **Single Central Record (SCR)** that is reviewed regularly and complies with statutory safeguarding requirements.
- The Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Leads (DDSLs) and safeguarding team are provided with sufficient time, funding, supervision, resources and authority to fulfil their statutory responsibilities effectively.

- Staff are supported to attend Child Protection Conferences, Child in Need Meetings, Strategy Meetings and all relevant multi-agency safeguarding meetings where required.
- All staff, including agency staff, supply teachers, volunteers and contractors, receive safeguarding induction before commencing work with pupils.
- All staff have access to, read and understand:

    ○ the WhiteTrees Safeguarding and Child Protection Policy ○ All staff must read and understand Part One and of Keeping Children Safe in Education 2026. ○ the Staff Code of Conduct ○ the school's Behaviour Policy ○ the Online Safety Policy ○ the Acceptable Use Policy ○ the Low-Level Concerns Policy.

- Every member of staff has access to CPOMS and receives training in recording safeguarding concerns accurately and promptly.
- Appropriate systems are in place to ensure staff fully understand and discharge their safeguarding responsibilities in accordance with statutory guidance.
- Staff feel confident to raise safeguarding concerns, including concerns relating to colleagues, and that all whistleblowing concerns are managed fairly, sensitively and without delay.
- Allegations relating to staff are managed promptly in accordance with **Keeping Children Safe in Education 2026**, with referrals to the Local Authority Designated Officer (LADO) made without delay where threshold criteria are met.
- Where allegations concern the Executive Headteacher, responsibility will transfer immediately to the Chair of Governors/Proprietor, who will liaise directly with the LADO.
- Safeguarding remains a standing agenda item at Senior Leadership Team meetings and forms part of ongoing quality assurance and school improvement activity.

Managing Allegations Against Adults Working With Children

WhiteTrees Independent School will respond promptly and appropriately to any allegation that an adult working with or on behalf of the school has harmed, or may have harmed, a child, may have committed a criminal offence against or related to a child, or has behaved towards a child or children in a way that indicates they may pose a risk of harm.

The person receiving an allegation must report it to the DSL without delay and must not investigate the allegation themselves. Where the allegation concerns the DSL, Executive Headteacher, proprietor or another senior leader, it must be escalated in accordance with the school's procedures and local authority arrangements.

All allegations will be recorded promptly, accurately and securely, including the date, time, nature of the concern and actions taken. The school will consult the Local Authority Designated Officer (LADO) where the allegation may meet the harm threshold or where there is any uncertainty about the appropriate response.
Where the threshold for LADO involvement is met, the LADO will be contacted without delay and the school will follow the agreed multi-agency process. The school will not undertake its own investigation where this could prejudice a police, Children's Social Care or LADO process.
Consideration will be given, in consultation with the LADO and other relevant agencies, to whether the adult should be removed from contact with children while enquiries are undertaken. Suspension will not be automatic and will only be considered where appropriate, taking account of the safety of children and the circumstances of the allegation.
The school will ensure that the person subject to an allegation is treated fairly, kept appropriately informed and provided with appropriate support, subject to safeguarding requirements and advice from the LADO or other agencies. Confidentiality will be maintained and information shared only with those who have a legitimate need to know.
Where an allegation is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child or person making the allegation may require support or may themselves be at risk of harm. Any deliberately malicious or knowingly false allegation will be considered in accordance with the school's relevant policies and procedures.
WhiteTrees will maintain appropriate liaison with the LADO and relevant agencies throughout the process and will ensure that outcomes and decisions are recorded. These arrangements apply to staff, supply teachers, trainee teachers, volunteers, contractors, agency workers and other adults working on behalf of the school.

The School also recognises that allegations of abuse may be made many years after the alleged incident occurred. Where an adult makes an allegation to the school that they were abused as a child, they will be supported and advised that they may report the allegation to the Police. Where a child makes a non-recent allegation concerning abuse by an adult, the school will report the matter to the Local Authority Designated Officer (LADO) in accordance with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Social Care and the Police where appropriate.

WhiteTrees recognises that abuse can be reported regardless of how long ago it happened and will respond to all such allegations in accordance with safeguarding procedures.

Definition of Low Level Concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, 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 designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Buying items, (e.g. food, drinks, gifts) for pupils out of own money
- Humiliating pupils

Sharing Low Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to Low Level Concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Deputy will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff school handbook and code of conduct. The Deputy will liase with the Head Teacher and Head of Safeguarding in respect to all low-level concerns.

Low-level concerns relating to supply staff and contractors will be shared with the relevant employing organisation so that potential patterns of inappropriate behaviour can be identified.

Recruitment

WhiteTrees Independent School is committed to safer recruitment and recognises that robust recruitment procedures form a vital part of safeguarding children. The school will ensure that:

- At least one member of every recruitment panel has successfully completed accredited Safer Recruitment training.
- WhiteTrees Independent School will comply with the revised definition of regulated activity introduced by the Crime and Policing Act 2026. The previous supervision exemption no longer applies. The school will ensure that volunteers undertaking regulated activity relating to children are subject to the appropriate safeguarding and DBS checks, including children barred-list information where required. Particular attention will be given to activities undertaken frequently, on more than three days in a 30-day period or overnight. All statutory pre-employment checks are completed before employment commences. Volunteers who are not undertaking regulated activity will be subject to an appropriate written risk assessment and any DBS or other checks considered necessary. A volunteer on whom appropriate checks have not been obtained will never be left unsupervised with children or permitted to undertake regulated activity.

- Appropriate online searches will be undertaken for shortlisted candidates as part of the school's safer recruitment procedures, in accordance with Keeping Children Safe
  in Education 2026. Safer recruitment and vetting procedures will be implemented in accordance with Part Three of Keeping Children Safe in Education 2026 and the school's Safer Recruitment Policy, including requirements relating to DBS checks, the DBS Update Service, teacher status checks, overseas applicants, self-employed individuals, agency and third-party staff, volunteers, contractors, visitors and work experience placements
- The Single Central Record is reviewed regularly to ensure continued compliance.
- Contractors, volunteers and agency staff are subject to appropriate safeguarding checks and risk assessments in accordance with statutory guidance.

Further information can be found within the WhiteTrees Recruitment Policy.

Governing Body

The Governing Body (and Proprietors) is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the culture, leadership and daily practice of WhiteTrees Independent School. The Governing Body will:

- Appoint a nominated **Safeguarding Governor** to provide strategic oversight and champion safeguarding across the school.
- Ensure safeguarding remains a standing agenda item at Governing Body meetings.
- Ensure safeguarding policies remain fully compliant with **Keeping Children Safe in Education 2026**, **Working Together to Safeguard Children** and all relevant safeguarding legislation.
- Ensure safeguarding procedures promote children's welfare through timely and proportionate action.
- Promote effective information sharing between agencies in accordance with statutory guidance and UK GDPR requirements.
- Ensure effective partnership working with Children's Social Care, Health Services, Police and safeguarding partners.
- Appoint an appropriately trained Designated Safeguarding Lead from the Senior Leadership Team together with suitably trained Deputy DSLs.

- Appoint an appropriately trained Designated Teacher for Children Looked After (CLA) and Previously Looked After Children (PLAC).
- Ensure all governors, staff, volunteers, contractors and agency workers understand their safeguarding responsibilities and receive appropriate safeguarding training.
- Ensure governors receive safeguarding training appropriate to their governance role and regular safeguarding updates.
- Ensure the Chair of Governors and Safeguarding Governor undertake additional role-specific safeguarding training.
- Ensure an effective safeguarding training strategy exists for all staff.
- Ensure safeguarding induction is completed before adults begin working with children.
- Ensure procedures are in place to manage allegations and low-level concerns relating to adults working within the school.
- Ensure appropriate arrangements exist for managing allegations against the Executive Headteacher.
- Monitor safeguarding practice through reports from the DSL and regular safeguarding audits.
- Ensure the school responds effectively to Children Missing Education and repeated missing episodes.
- Ensure sufficient resources are available to manage concerns relating to serious violence, child-on-child abuse, harmful sexual behaviour, online abuse and exploitation.
- Promote preventative education regarding knife crime, county lines, criminal exploitation and online safety.
- Ensure appropriate filtering and monitoring systems are in place to safeguard pupils online.
- **Receive assurance that filtering and monitoring systems are formally reviewed at least annually**, with outcomes, identified risks and actions reported to the Governing Body.
- Ensure pupils are educated about online safety, cyber security, social media, **Generative Artificial Intelligence (AI)**, deepfakes, misinformation and emerging online harms through an age-appropriate curriculum.
- Seek assurance that safeguarding arrangements remain effective across all school sites, off-site provision and alternative provision.
- Enable staff, pupils and parents to contribute to the development of safeguarding policies and procedures.
- Prevent unsuitable individuals from working with children through robust safer recruitment practices and appropriate supervision of volunteers.
- Ensure at least one member of every interview panel has completed accredited Safer Recruitment training.

- Recognise the increased vulnerability of certain groups of children, including children with SEND, Children Looked After, Previously Looked After Children, young carers, children with medical needs and children who have or have previously had a social worker.
- Promote an open safeguarding culture where concerns are identified early, acted upon promptly and reviewed regularly to ensure the ongoing safety and wellbeing of pupils

The Governing Body recognises its strategic responsibility for ensuring that the school's filtering and monitoring arrangements remain effective and proportionate.

The Governing Body will receive an **annual written report** from the Designated Safeguarding Lead and the member of staff responsible for filtering and monitoring, confirming:

- the effectiveness of filtering and monitoring systems
- outcomes of the annual review and testing of internet-connected devices
- emerging online safeguarding risks
- incidents involving online safety, AI-generated content or deepfakes · any actions required to strengthen online safeguarding arrangements.

This evidence will form part of the school's annual safeguarding assurance process and support continuous improvement.

Looked After Children (CLA), Previously Looked After Children (PLAC) and the Role of the Designated Teacher & Designated Safeguarding Lead

WhiteTrees Independent School recognises that **Children Looked After (CLA)** and **Previously Looked After Children (PLAC)** are among the most vulnerable pupils and may have experienced abuse, neglect, trauma, loss or significant disruption to their education. The Governing Body has appointed a **Designated Teacher (DT)** who is appropriately trained and has responsibility for promoting the educational achievement, attendance, wellbeing and progress of Children Looked After and Previously Looked After Children. The Designated Teacher will:

- Work closely with the Virtual School Head (VSH) and Virtual School team.
- Support Personal Education Plans (PEPs) and educational planning.
- Monitor educational progress, attendance and wellbeing.
- Ensure that pupils receive appropriate educational and pastoral support.
- Promote high aspirations and remove barriers to learning.

- Work collaboratively with the Designated Safeguarding Lead (DSL), social workers, carers, parents (where appropriate) and other professionals.

The Designated Safeguarding Lead will:

- Maintain up-to-date contact details for the child's allocated social worker, Virtual School and other relevant professionals.
- Work closely with the Designated Teacher to ensure safeguarding and educational needs are considered together.
- Ensure safeguarding information is appropriately shared when pupils transfer schools.
- Monitor safeguarding concerns affecting Children Looked After and Previously Looked After Children.
- Ensure timely multi-agency working to safeguard vulnerable pupils.

The School recognises that many Previously Looked After Children continue to experience vulnerability after leaving care. Appropriate pastoral, educational and safeguarding support will therefore continue to be provided following adoption, Special Guardianship Orders, Child Arrangements Orders or where children were adopted from state care outside England and Wales.

Care Leavers

The School recognises that some young people leaving care continue to require significant educational and emotional support.
Where appropriate, the Designated Teacher and relevant staff will work with the young person's **Personal Adviser**, social worker and other professionals to support implementation of their Pathway Plan and promote positive educational, emotional and transition outcomes.

Identifying Concerns

Every member of staff, volunteer, governor, contractor and visitor has a responsibility to remain vigilant to signs of abuse, neglect, exploitation and emerging safeguarding concerns. All staff know how to recognise safeguarding concerns, respond appropriately to disclosures and record concerns promptly using **CPOMS**.
Staff understand that safeguarding concerns rarely occur in isolation and that multiple forms of abuse, neglect or exploitation frequently overlap. WhiteTrees promotes a culture of:

- professional curiosity
- early identification

- timely intervention
- effective information sharing
- listening to the child's voice
- maintaining an attitude of **"it could happen here."**

Staff are familiar with **What to do if you're worried a child is being abused** together with **Keeping Children Safe in Education 2026**.

Possible Indicators of Abuse or Neglect

The following examples may indicate that a child requires additional support or safeguarding intervention. These indicators should always be considered within the wider context of the child's circumstances.
Staff should remain vigilant where children:

- display sudden or significant changes in behaviour
- become withdrawn, anxious, fearful or unusually aggressive
- present with repeated unexplained injuries
- regularly wear clothing that is inappropriate, dirty or unsuitable
- consistently display poor personal hygiene
- avoid particular adults or family members
- refuse to change clothing for PE or other activities
- experience sudden deterioration in attendance or educational progress
- appear regularly tired, hungry or neglected
- frequently go missing from education, home or care
- talk about running away
- discuss being left alone or cared for by inappropriate adults
- reach developmental milestones significantly later without medical explanation
- have poor punctuality or are collected late on a regular basis
- have parents or carers who appear intoxicated or unable to meet their needs
- receive little or no supervision online
- access inappropriate social media or online platforms
- become involved in harmful online behaviour
- become victims of online grooming, exploitation or coercion
- become involved with **Generative Artificial Intelligence (AI)**, deepfake imagery
- online impersonation, sextortion or other technology-enabled abuse
- regularly consume alcohol or substances
- display concerning mental health or emotional wellbeing needs
- undertake inappropriate caring responsibilities for siblings or family members
- appear fearful of physical contact or flinch unexpectedly

The presence of one or more indicators does not necessarily mean abuse has occurred however, staff must remain professionally curious and report concerns promptly.

Categories of Child Abuse

The four recognised categories of child abuse are:

1. Physical Abuse
2. Emotional Abuse
3. Sexual Abuse
4. Neglect

Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused:

- within their family
- within an institutional or community setting
- by adults
- by another child or young person
- online
- offline or
- where technology is used to facilitate abuse.

Abuse includes the impact of witnessing domestic abuse and may involve multiple forms of harm occurring simultaneously.
WhiteTrees participates in Operation Encompass arrangements where applicable. Notifications relating to domestic abuse incidents will be received and managed confidentially by the DSL, recorded appropriately, and considered alongside existing safeguarding information. Operation Encompass notifications do not replace normal safeguarding referrals where a child is at risk of harm.

Physical Abuse

Physical abuse may involve:

- hitting
- shaking
- throwing
- poisoning
- burning
- scalding
- drowning
- suffocating
- fabricating illness or
- deliberately inducing illness.

Possible indicators include:

- unexplained bruising
- burns
- bite marks
- fractures
- repeated injuries
- inconsistent explanations
- delayed medical treatment
- aggressive or fearful behaviour

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child resulting in significant adverse effects upon emotional development. It may include:

- humiliation
- rejection
- intimidation
- excessive criticism
- inappropriate expectations
- exposure to domestic abuse
- coercive control
- serious bullying
- cyberbullying
- emotional manipulation
- exploitation.

Possible indicators include:

- low self-esteem
- developmental delay
- withdrawn behaviour
- excessive compliance
- attachment difficulties
- anxiety
- emotional dysregulation
- difficulty forming relationships.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to participate in sexual activities.
This includes:

- contact abuse
- non-contact abuse
- grooming
- online sexual abuse
- child sexual exploitation
- sexual coercion
- sexual extortion (sextortion)
- the creation, sharing or possession of indecent images • **AI-generated sexual images and deepfake imagery** • abuse facilitated through technology.

Sexual abuse can be perpetrated by adults or by other children.

Possible indicators include:

- age-inappropriate sexualised behaviour
- harmful sexual behaviour
- excessive masturbation
- self-harm
- eating disorders
- unexplained genital injuries
- reluctance to change for PE
- sexualised language beyond developmental expectations.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. Neglect may include failing to provide:

- adequate food
- clothing
- shelter
- supervision
- medical treatment
- emotional support
- protection from harm
- appropriate online supervision.

Possible indicators include:

- persistent hunger
- poor hygiene
- unsuitable clothing
- untreated medical conditions
- poor attendance
- emotional withdrawal
- failure to thrive
- low self-esteem
- lack of supervision
- exposure to substance misuse
- unrestricted access to inappropriate online content.

Upskirting

Upskirting is a criminal offence and typically involves taking a photograph or recording beneath a person's clothing without their knowledge or consent, with the intention of viewing their genitals, buttocks or underwear to obtain sexual gratification or to humiliate, alarm or distress the victim.

WhiteTrees Independent School recognises that up skirting is a form of child-on-child abuse and will treat all reports seriously. Any incident will be managed in accordance with the school's Child-on-Child Abuse Policy, safeguarding procedures and statutory guidance.

All staff receive safeguarding training, including awareness of up skirting, harmful sexual behaviour, child-on-child abuse and online safety. Pupils are taught about these issues through the Relationships, Sex and Health Education (RSHE)

curriculum, Personal, Social, Health and Economic (PSHE) education, assemblies and sessions delivered by external safeguarding partners,
including the Police where appropriate.

The school also recognises that technology is increasingly being used to facilitate abuse. Staff remain alert to safeguarding risks involving: • mobile phones and hidden recording devices

- image-based abuse
- sharing of nude and semi-nude images
- **AI-generated sexual images and deepfakes**
- online coercion and sextortion
- misuse of social media and messaging platforms.

Online Safety and Remote Learning

The School recognises that safeguarding responsibilities extend beyond the school site and continue whenever pupils access learning remotely or engage online.
The school acknowledges that children may be at increased risk of online abuse when learning from home or when supervision is limited. To reduce these risks, WhiteTrees will:

- provide parents and carers with online safety guidance and practical advice
- offer support through newsletters, telephone contact, coffee mornings and the school website
- educate pupils about safe online behaviour through the curriculum
- promote the safe use of digital technology, including **Generative Artificial Intelligence (AI)**
- teach pupils how to identify misinformation, manipulated media (deepfakes), online grooming and cyber-enabled abuse
- operate effective filtering and monitoring systems across school devices
- review filtering and monitoring arrangements at least annually in accordance with KCSIE 2026.

Contextual Safeguarding

The School recognises that safeguarding concerns frequently occur beyond the school environment and may be influenced by a child's wider relationships, peer groups, family circumstances, online activity and community experiences.
Staff understand that this is referred to as **contextual safeguarding** and will always consider the wider environmental factors that may place a child at risk.
Where appropriate, the school will work collaboratively with safeguarding partners to reduce risk and improve outcomes for children.
Contextual safeguarding concerns may include, but are not limited to:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Serious Violence
- Radicalisation and Extremism
- Human Trafficking
- Harmful Sexual Behaviour (HSB)
- Child-on-Child Abuse
- Sexual Violence and Sexual Harassment
- Online Exploitation
- Technology-Facilitated Abuse
- Honour-Based Abuse
- Domestic Abuse

The Designated Safeguarding Lead will make timely referrals to Children's Social Care, Family Help Services Police or other safeguarding agencies whenever appropriate. WhiteTrees will consider whether children and families may benefit from universal services and communitybased early help or targeted Family Help where additional needs are identified. The DSL will be familiar with local thresholds and referral pathways and will work with families and relevant agencies to identify appropriate support.

Where a child has been harmed, is at risk of harm or is in immediate danger, the school will make an appropriate referral to Children's Social Care. Where a referral is made, parents or carers will normally be informed unless there are compelling safeguarding reasons not to do so. The rationale for decisions will be recorded.

The School also recognises that modern slavery and human trafficking are forms of child abuse and exploitation. Where there are concerns that a child may be a victim of modern slavery or trafficking, the Designated Safeguarding Lead will ensure that relevant child protection procedures are followed and will consider whether a referral

to the National Referral Mechanism (NRM) is required, alongside referrals to Children's Social Care, the Police and other relevant safeguarding agencies where appropriate.

Children Who May Need Family Help or Additional Safeguarding Support

Staff should remain alert where a child:

- has Special Educational Needs or Disabilities (SEND)
- is a young carer
- has or has previously had a social worker
- is showing signs of child criminal exploitation or child sexual exploitation
- is at risk of county lines involvement
- is frequently missing from education, home or care
- misuses drugs, alcohol or other substances
- is at risk of modern slavery or trafficking
- experiences domestic abuse within the family
- is affected by parental substance misuse or poor mental health
- is showing early signs of abuse or neglect
- is vulnerable to radicalisation or extremism
- displays age-inappropriate sexualised behaviour
- is privately fostered
- is vulnerable to online exploitation, AI-enabled abuse or cybercrime.

All staff understand that they must always act in the **best interests of the child** and report concerns immediately in accordance with WhiteTrees safeguarding procedures.

Children with Special Educational Needs and Disabilities (SEND)

The school recognises that children with SEND may face additional safeguarding challenges and may be disproportionately vulnerable to abuse, neglect and exploitation. Staff understand that children with SEND may:

- have communication differences that make disclosures more difficult
- experience barriers to recognising abusive behaviour
- be more vulnerable to bullying, exploitation or coercion
- require additional support to understand healthy relationships and online safety.

When considering safeguarding concerns involving pupils with SEND, staff will avoid making assumptions that behaviours, injuries or emotional presentation are solely related to a child's disability.
Safeguarding assessments will always take account of the child's communication needs, developmental stage and individual vulnerabilities.

Where appropriate, safeguarding responses will be informed by:

- Positive Behaviour Support Plans
- Positive Handling Plans
- Education, Health and Care Plans (EHCPs)
- Individual Risk Assessments
- Medical Care Plans
- Behaviour Support Plans.

Attendance and Children Missing Education

The School recognises that good attendance is a fundamental safeguarding priority. Children who are persistently absent, missing education or repeatedly absent may be at increased risk of abuse, neglect, exploitation, criminal activity or other safeguarding concerns. Attendance is therefore monitored closely by school leaders, with safeguarding concerns considered alongside attendance information. Where concerns arise:

- the reason for absence will be established with parents or carers as soon as possible on the first day
- emergency contacts will be contacted where parents cannot be reached

- home visits will be undertaken where appropriate
- safeguarding risk assessments will be completed
- referrals will be made to Children's Social Care, Police or the Local Authority where necessary.

The school will:

- Notify Children's Social Care immediately where a child subject to a Child Protection Plan is absent without explanation
- notify the Local Authority where pupils meet the statutory Children Missing Education criteria
- maintain accurate admissions and attendance registers
- work proactively with Education Welfare Services and safeguarding partners
- carefully monitor repeated absences, reduced timetables and patterns of attendance that may indicate emerging safeguarding concerns
- ensure no pupil is removed from roll except in accordance with statutory regulations

Where a pupil's destination cannot be established despite reasonable enquiries, the Local Authority will be informed immediately.
WhiteTrees also recognises that persistent absence may indicate:

Child sexual exploitation child criminal exploitation county lines involvement forced marriage

- female genital mutilation (FGM)
- domestic abuse
- mental health concerns
- online exploitation
- serious violence

These concerns will always be considered as part of the school's safeguarding response. Where pupils receive a fixed-term suspension, parents, carers and the placing Local Authority will be informed in writing. During the period of suspension, the school will continue to provide educational work and will maintain appropriate safeguarding oversight through communication with the family and relevant professionals where necessary.

The Designated Safeguarding Lead will regularly analyse attendance, safeguarding and behaviour data together to identify emerging patterns, trends and risks. This information will be used to inform early intervention, safeguarding practice and strategic reporting to the Governing Body.

Extremism, Radicalisation, the Prevent Duty and Channel

WhiteTrees Independent School is committed to safeguarding pupils from all forms of radicalisation, extremism and terrorism.
The school recognises that radicalisation is a safeguarding issue and that vulnerable children may be targeted by individuals or groups seeking to exploit them through ideology, misinformation, online activity or social influence. WhiteTrees promotes the fundamental British Values of:

- Democracy
- the rule of law
- individual liberty
- mutual respect
- tolerance of those with different faiths and beliefs.

We actively encourage pupils to express their views respectfully whilst developing critical thinking skills, resilience and the ability to challenge extremist narratives safely.

All staff complete **Prevent Duty** and **Channel Awareness** training as part of their induction and receive regular safeguarding updates thereafter.

Any concerns relating to radicalisation or extremism will be reported immediately to the Designated Safeguarding Lead, who will consider referrals to **Channel**, Children's Social Care or the Police where appropriate. Where a child is subject to prevent/channel the DSL will ensure that relevant information is shared with the police in accordance with local procedures and data protection requirements.

Forced Marriage and Honour-Based Abuse

The School recognises that Forced Marriage and Honour-Based Abuse are serious safeguarding concerns.

A forced marriage differs from an arranged marriage because one or both individuals do not freely consent and duress is involved.

Staff understand that victims may be at immediate risk of:

- physical abuse
- emotional abuse
- sexual abuse
- coercive control
- honour-based violence
  family isolation

Where concerns arise:

- staff will immediately inform the DSL
- the child will **never** be returned to the family or asked to mediate
- family members will **not** be informed before safeguarding advice is sought
  referrals will be made to Children's Social Care and Police where appropriate

Female Genital Mutilation (FGM)

The School recognises that Female Genital Mutilation (FGM) is illegal and constitutes child abuse.

All staff receive training regarding:

- indicators of FGM
- mandatory reporting duties
- safeguarding procedures.

Teachers understand their statutory duty to report known cases of FGM directly to the Police whilst informing the DSL immediately.

Bullying and Child-on-Child Abuse

The School recognises that bullying can have significant safeguarding implications. Bullying may include:

- physical bullying
- verbal bullying
- emotional bullying
- cyberbullying
- racist bullying
- sexist bullying
- homophobic bullying
- biphobic bullying
- transphobic bullying
- disability-related bullying
- prejudice-based bullying

The school also recognises that technology may facilitate bullying through:

- social media
- messaging platforms
- AI-generated content
  manipulated images
- deepfakes

All concerns will be managed in accordance with the Anti-Bullying Policy and Child-on-Child Abuse Policy.

Children who are questioning their gender will be supported in accordance with KCSIE 2026. Where a child or parent/carer requests support relating to social transition, the school will consider the welfare and best interests of the child and other children, relevant safeguarding, equality and human rights considerations, and any relevant professional advice. The DSL will be involved in the decision-making process and parents/carers will normally be engaged. Decisions, rationale and any agreed arrangements will be recorded and reviewed.

WhiteTrees Independent School does not provide PE or sporting activities on its premises and does not have dedicated changing room or showering facilities. These arrangements are therefore not applicable to the school's onsite provision.

Where pupils participate in PE, sport or physical activity offsite or through an external provider, the school will ensure that appropriate safeguarding arrangements

and risk assessments are in place, including consideration of supervision, facilities, privacy and the individual needs of pupils

Online Safety

The School recognises that safeguarding responsibilities extend to pupils' use of technology both inside and outside school.
Online safety forms an integral part of safeguarding and is embedded throughout the curriculum.

The school teaches pupils to remain safe online through:

- RSHE
- PSHE
- Computing
- safeguarding workshops

Pupils are educated about:

- online grooming
- cyberbullying
- sextortion
- sharing nude and semi-nude images
- misinformation
- online fraud
- gaming risks
- social media
- online relationships
- **Generative Artificial Intelligence (AI)**
- **deepfakes**
- digital resilience.

WhiteTrees operates effective filtering and monitoring systems to protect pupils whilst ensuring appropriate educational access.
In accordance with **Keeping Children Safe in Education 2026**, the Designated Safeguarding Lead understands the school's filtering and monitoring arrangements, and the Governing Body receives assurance that these systems are reviewed and tested **at least annually led by the DSL and SLT with IT support.** Outcomes of the review are recorded and used to strengthen online safeguarding arrangements.

All staff receive induction and refresher training covering:

- online safety
- filtering and monitoring
- acceptable use
- emerging technologies
- safeguarding risks associated with AI.

Use of Artificial Intelligence (AI)

WhiteTrees Independent School recognises that Artificial Intelligence (AI) provides significant educational opportunities whilst also introducing new safeguarding risks. The school will ensure that AI is used responsibly, ethically and safely, protecting pupils from:

- exploitation
- grooming
- manipulation
  misinformation
  deepfake abuse AI-
  enabled bullying
  harmful automated interactions
  online radicalisation.

The school will have regard to:

- Keeping Children Safe in Education 2026
- Online Safety Act 2023
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- UK GDPR
- Independent School Standards
- Working Together to Safeguard Children
- DfE guidance relating to Generative AI in education.

AI Safeguarding Risks

The School recognises that vulnerable pupils, particularly those with SEMH needs, may be at increased risk from:

- AI-generated grooming
- AI chatbots encouraging harmful behaviour
- deepfake imagery
- AI impersonation of trusted adults
- AI-generated extremist material
- AI-assisted fraud
- AI-generated abusive or threatening communications.

All safeguarding concerns involving AI will be managed through the school's safeguarding procedures and recorded immediately on **CPOMS**.

Staff Responsibilities

Staff must:

- Never upload identifiable pupil information into public AI systems
- only use approved AI platforms
- verify AI-generated information before using it professionally
- report any AI safeguarding concerns immediately
- follow the WhiteTrees AI Policy and Acceptable Use Policy
- complete AI safeguarding training.

Examples of reportable incidents include:

- Deepfake images involving pupils or staff
- AI-generated bullying
- AI impersonation
- AI-generated threats
- misuse of pupil images • AI assisted grooming.

Where appropriate, incidents will be referred to Police, Children's Social Care or other agencies.

School Responsibilities

Before introducing any AI system, WhiteTrees will complete an AI Risk Assessment considering:

- safeguarding
- data protection
- bias
- misinformation
- impact upon vulnerable pupils
- equality implications • staff competence
- cyber security.

The school will ensure:

- AI systems are approved by senior leaders
- safeguarding implications are reviewed
- staff receive appropriate training
- AI use is monitored
- incidents are investigated
- parents are informed where appropriate.

Images and Media

Where parental consent has been obtained, WhiteTrees may publish photographs or videos celebrating pupil achievement. To safeguard pupils the school will:

- Remove surnames from published material
- securely store images
- monitor misuse of school media

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  complete Data Protection Impact Assessments where appropriate never use facial recognition technologies without lawful justification and approval.

Governance

The Governing Body will receive an annual safeguarding report covering:

- AI safeguarding incidents
- deepfake incidents
- online safety trends
- filtering and monitoring review outcomes
- safeguarding training compliance
- policy updates
- risk assessment outcomes.

The findings will be reviewed by governors and used to strengthen safeguarding practice where appropriate.

Cybercrime

WhiteTrees Independent School recognises that cybercrime is an increasingly significant safeguarding concern. Cybercrime refers to criminal activity committed using computers, digital devices and the internet. It is broadly categorised as:

- **Cyber-enabled crime** – offences that can occur offline but are committed at greater scale or speed through technology.
- **Cyber-dependent crime** – offences that can only be committed through the use of computers or digital technology.

Examples of cyber-dependent crime include:

- unauthorised access to computer systems ("hacking")

- denial of service (DoS) or distributed denial of service (DDoS) attacks
- creating, obtaining or distributing malware, including viruses, spyware, ransomware, botnets and remote access tools
- compromising school networks or attempting to alter school data or records.

Whitetrees recognises that pupils with advanced computing skills may unintentionally or deliberately become involved in cybercrime. Staff will always respond proportionately, recognising that some pupils may themselves be vulnerable to exploitation.
The school also recognises that cybercrime increasingly includes the misuse of Artificial Intelligence (AI), including:

- AI assisted phishing and fraud
- AI generated malicious software
- AI enabled impersonation
- AI assisted cyberbullying
- AI generated threats and intimidation.

Material published online by pupils or staff that brings the school into disrepute or constitutes bullying, harassment, discrimination or abuse will be managed under the Behaviour Policy, Staff Code of Conduct, Online Safety Policy and Safeguarding Policy.

Sharing Nudes and Semi-Nudes

WhiteTrees follows the latest UK Council for Internet Safety (UKCIS) guidance: *Sharing nudes and semi-nudes: advice for education settings working with children and young people*, alongside Keeping Children Safe in Education 2026. The school recognises that image sharing may occur through:

- Mobile phones
- social media
- messaging applications
- cloud storage
- gaming platforms
- **AI generated or manipulated images**, including deepfakes.

All incidents will be treated as safeguarding concerns and managed proportionately, with the welfare of the child remaining paramount. All concerns will receive an appropriate safeguarding response, regardless of whether the image was shared consensually or nonconsensually

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Where concerns arise:

- Incidents must be reported immediately to the DSL using CPOMS
- pupils will be reassured and supported
- staff will avoid criminalising children unnecessarily where safeguarding responses are more appropriate.

Staff Responsibilities

If a member of staff becomes aware of an incident involving the sharing of nude or semi-nude images, they must:

inform the Designated Safeguarding Lead immediately
record the concern on CPOMS

- reassure the child that they have done the right thing
- explain that information must be shared in order to keep them safe.

Staff **must not**:

- view images unless absolutely necessary
- save, print or distribute images
- ask pupils to forward images
- delete images
- investigate the incident themselves
- promise confidentiality.

DSL Initial Review

Following notification, the Designated Safeguarding Lead will undertake an immediate safeguarding assessment. The DSL will consider:

- immediate safeguarding risks
- whether Police involvement is required
- whether Children's Social Care should be informed
- whether the image needs to be viewed
- whether AI-generated or manipulated imagery is involved

- whether coercion, exploitation or grooming is suspected
- the child's age, understanding and vulnerabilities
- wider safeguarding concerns.

The DSL will record all decisions and rationale within CPOMS.

Referral to Police and Children's Social Care

The DSL will immediately refer the matter where:

- an adult is involved
- coercion or blackmail is suspected
- exploitation or grooming is identified
- AI-generated sexual imagery or deepfakes are being used to exploit a child
- the child is under 13 and sexual imagery has been created
- there is immediate risk of significant harm.

Child Sexual Exploitation (CSE)

The School recognises Child Sexual Exploitation (CSE) as a form of child abuse. CSE may involve:

- gifts
- money
- accommodation
- affection
- status
- drugs or alcohol
- online relationships
- coercion
- manipulation.

Staff remain alert to indicators including:

- unexplained gifts
- missing episodes
- older associates
- inappropriate online relationships
- unexplained hotel stays

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- repeated sexually transmitted infections
- emotional withdrawal.

The school will work closely with Police, Children's Social Care and safeguarding partners where concerns arise.
Child criminal exploitation and child sexual exploitation may involve trafficking and may constitute modern slavery. Where there are concerns that a child may be a victim of trafficking or modern slavery, the DSL will follow relevant child protection procedures

Sexual Violence and Sexual Harassment Between Children

WhiteTrees adopts a zero-tolerance approach to sexual violence, sexual harassment and harmful sexual behaviour. This may occur:

- between any children
- online • offline
- inside or outside school.

This includes:

- sexual comments
- sexual jokes
  unwanted touching
  sexual assault
- online sexual harassment
- image-based abuse
- sharing sexual images
- sexual coercion
- **AI-generated sexual imagery and deepfake abuse**.

WhiteTrees recognises that harmful sexual behaviour exists on a continuum, ranging from inappropriate or problematic sexualised behaviour through to serious sexual harassment and sexual violence. All reports will be taken seriously and assessed individually, with appropriate safeguarding action taken to protect the child and address the behaviour.

The school recognises that girls, children with SEND, Children Looked After (CLA) and LGBTQ+ pupils may be disproportionately affected.

Staff Expectations

Staff will:

- always believe and support the victim
- never minimise reports as "banter"
- never describe behaviour as "boys being boys"
- record concerns immediately
- inform the DSL without delay
- complete a CPOMS record.

Victims will always be:

- listened to
- protected
- supported
- kept informed throughout the safeguarding process.

DSL Initial Response

The Designated Safeguarding Lead will:

- complete an immediate risk assessment
- consider the wishes of the victim
- assess ongoing risks to all pupils
- determine whether Police or Children's Social Care should be involved • consider any criminal investigation
- provide ongoing pastoral support
- review safety plans.

Informing Parents

Parents and carers will usually be informed at an early stage unless doing so would increase the risk of harm to the child.

The rationale for decisions will be recorded within CPOMS.

Recording

All incidents involving:

- sexual violence
- sexual harassment
- image-based abuse
- sharing of nude or semi-nude images
- AI-generated sexual imagery • deepfake abuse will be fully recorded within CPOMS, including:

- decisions made
- referrals completed
- actions taken
- outcomes
- ongoing support arrangements.

Technology-Facilitated Sexual Abuse

The School recognises that advances in technology have increased the risk of technologyfacilitated sexual abuse. This includes:

- AI-generated indecent images
- deepfake sexual imagery
- image manipulation
- sextortion
- online coercion
- AI-enabled grooming
- synthetic child sexual abuse material.

All reports of technology-facilitated abuse will be managed as safeguarding concerns. The school will work with Police, Children's Social Care, internet providers and other agencies to remove harmful material where possible and support any affected pupil.

Curriculum Coverage

WhiteTrees Independent School recognises that preventative education plays a fundamental role in safeguarding children. Safeguarding themes are embedded throughout the curriculum, enabling pupils to develop the knowledge, resilience and confidence needed to keep themselves safe both online and offline.
Pupils are taught about the sharing of **nude and semi-nude images**, image-based abuse and online sexual harassment through the Relationships, Sex and Health Education (RSHE), Personal, Social, Health and Economic (PSHE) and Computing curricula. Teaching includes:

- what constitutes sharing of nude and semi-nude images
- how incidents commonly occur
- consent and healthy relationships
- legal implications
- emotional and reputational consequences
- how to respond to requests for images
- strategies for refusing pressure
- how to seek help and report concerns safely.

In addition, pupils receive age-appropriate education regarding:

- cyberbullying
- online grooming
- child sexual exploitation
- criminal exploitation
- online fraud
- misinformation
- **Generative Artificial Intelligence (AI)**
- deepfakes and manipulated media
- digital resilience
- responsible use of technology.

The school's procedures relating to image-based abuse are shared with pupils through the curriculum and pastoral support.

Online Safety and the Use of Technology

The School recognises that technology forms an integral part of children's lives and that online safety is an essential element of safeguarding.
The school is committed to:

- maintaining effective safeguarding arrangements for all digital technologies
- protecting and educating pupils, staff, volunteers and governors regarding safe technology use
- promoting responsible use of mobile devices
- responding promptly to emerging online safeguarding risks
- embedding online safety throughout the curriculum.

The school operates effective filtering and monitoring systems which:

- block inappropriate or harmful material
- support effective safeguarding monitoring
- minimise disruption to teaching and learning
- are compatible with emerging technologies, including AI
- are reviewed and tested **at least annually** in accordance with KCSIE 2026 and DfE Filtering and Monitoring Standards.

The annual review will include:

- effectiveness of filtering
- effectiveness of monitoring
- testing across internet-connected devices
- emerging safeguarding risks
- recommendations for improvement.

Findings will be reported to the Governing Body as part of the school's safeguarding assurance arrangements.

Generative Artificial Intelligence (AI) and Emerging Technology

The School recognises that Generative Artificial Intelligence (AI) presents both educational opportunities and safeguarding risks.
The school will ensure pupils are taught how to:

- critically evaluate AI-generated information
- recognise deepfakes and manipulated media

- understand the risks of AI-enabled grooming, exploitation and misinformation
- use AI safely, ethically and responsibly.

Staff will receive annual training covering:

- AI safeguarding risks
- acceptable professional use of AI
- data protection
- confidentiality
- reporting AI-related safeguarding concerns.

The Governing Body will receive annual assurance that AI-related safeguarding risks have been considered as part of the school's wider filtering and monitoring review.

Mobile Phones

Whitetrees do not allow pupils to have Mobile phones onsite. Devices must be handed to staff immediately on arrival and securely stored until the end of the school day.

This arrangement forms part of the school's safeguarding strategy and helps reduce online safeguarding risks.

Staff may bring personal mobile phones to work but:

- use is limited to non-contact time
- personal devices must never be used to photograph or record pupils
- school devices will always be used where photographs are authorised.

The Four Categories of Online Risk

WhiteTrees adopts the DfE's four-category model of online risk.

Content

Exposure to harmful material including:

- pornography
- extremism
- self-harm
- suicide
- racism

- misogyny
- antisemitism
- misinformation
- AI-generated harmful content.

Contact

Harmful interactions including:

- grooming
- coercion
- exploitation
- commercial exploitation
- radicalisation
- adults posing as children.

Conduct

Unsafe online behaviour including:

- cyberbullying
- sharing of nude and semi-nude images
- image-based abuse
- online harassment • misuse of AI tools.

Commerce

Online risks including:

- scams
- phishing
- gambling
- financial exploitation
- fraudulent AI-generated communications.

To Achieve These Aims WhiteTrees Will:

- Deliver comprehensive online safety education through RSHE, PSHE and Computing.
- Teach pupils about safe use of social media, gaming and emerging technologies.
- Teach pupils how to recognise misinformation, deepfakes and AI-generated content.
- Promote responsible use of Generative AI.
- Teach pupils how to report online concerns.

- Provide annual safeguarding training for all staff covering online safety, cyber security, filtering and monitoring, AI safeguarding risks and digital safeguarding.
- Provide parents with online safety guidance through newsletters, coffee mornings, workshops and the school website.
- Ensure all members of the school community understand the Acceptable Use Policy.
- Explain sanctions relating to misuse of technology.
- Exercise statutory powers to search devices where lawful and proportionate.
- Complete an annual online safety risk assessment.
- Review online safety provision annually as part of safeguarding quality assurance.

Allegations Made by One Pupil Against Another

The School recognises that child-on-child abuse may include:

- physical abuse
- emotional abuse
- bullying
- coercion

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intimidation
sexual violence
sexual harassment
image-based abuse
online abuse • AI
generated abuse
• exploitation.

All allegations will be treated seriously and never dismissed as:

- Banter
- horseplay
- growing up
- "boys being boys."

Where safeguarding concerns arise:

- the concern must be recorded immediately on CPOMS
- the DSL must be informed without delay
- appropriate safeguarding referrals will be considered
- Police involvement will be sought where criminal offences may have occurred
- comprehensive risk assessments will be completed
- both victim and alleged perpetrator will receive appropriate support.

Gangs and Child Criminal Exploitation

The School recognises that pupils with SEMH needs may be particularly vulnerable to exploitation by gangs and organised criminal groups. Staff remain vigilant to indicators including:

- missing episodes
- unexplained money or possessions
- new peer groups
- county lines activity
- exploitation through social media
- threats or intimidation.

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All concerns must be reported immediately to the DSL and recorded on CPOMS.

Managing Risk Between Pupils

The school maintains robust arrangements to minimise safeguarding risks, including:

Detailed admissions information
safeguarding transition meetings
personalised timetables
dynamic risk assessments including Impact risk assessments
Positive Behaviour Support Plans

- enhanced supervision
- restorative practice
- trauma-informed approaches.

These arrangements significantly reduce opportunities for harmful behaviour whilst supporting positive relationships.

Managing Allegations Against Other Pupils

Where allegations are made:

- The DSL will be informed immediately
- a factual CPOMS record will be completed
- no internal investigation will commence until safeguarding advice has been obtained where appropriate
- Children's Social Care and Police will be consulted where required
- safeguarding risk assessments will be completed
- support plans will be developed for all pupils involved.

Support may include:

- therapeutic intervention
- pastoral support
- personalised timetables
- family support

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- multi-agency working
- ongoing review.

Child Criminal Exploitation (County Lines)

The School recognises Child Criminal Exploitation (CCE), including County Lines, as a form of child abuse.
Staff understand that children may appear to consent whilst remaining victims of exploitation. Possible indicators include:

- repeated missing episodes
- unexplained travel
- possession of multiple mobile phones
  unexplained money
  association with older
  individuals violence carrying
  weapons changes in
  behaviour.

Concerns will always be reported immediately to the DSL and recorded on CPOMS.

Homelessness

The school recognises that homelessness can significantly increase safeguarding risks. Where pupils or families are experiencing housing difficulties, the DSL will:

- provide appropriate support
- work with Housing Services
- liaise with Children's Social Care
- consider safeguarding referrals where necessary.

Where the school receives notification that a pupil has been placed in temporary accommodation, the information will be considered promptly as part of the pupil's safeguarding and welfare assessment. The DSL will consider whether any additional safeguarding support is required and will liaise with relevant agencies where appropriate.

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Children and the Court System

WhiteTrees Independent School recognises that children may become involved in the court system as victims, witnesses or defendants. Such experiences may affect a child's emotional wellbeing, behaviour, attendance, relationships and educational engagement.

The DSL and relevant staff will work with Children's Social Care, the Police, Youth Justice Services, courts and other professionals where appropriate to ensure that safeguarding and educational needs are considered and that information is shared lawfully and proportionately.

Where a child is involved in court proceedings, the school will provide appropriate support and reasonable adjustments where required, recognising the potential impact of court involvement on the child's welfare and education.

Children with Family Members in Prison

WhiteTrees recognises that having a family member in prison can have a significant impact on a child's emotional wellbeing, behaviour, attendance and safeguarding. Staff will remain professionally curious where changes in presentation or circumstances may indicate that additional support is required.

Where appropriate, the DSL will work with the child, family, Children's Social Care, relevant support services and other professionals to identify appropriate safeguarding, pastoral and educational support.

Child Employment

The school recognises that children undertaking employment remain entitled to safeguarding protection.
Where concerns arise regarding employment, exploitation or excessive working hours, the DSL will consider appropriate safeguarding action.

Private Fostering

Staff understand that private fostering arrangements lasting **28 days or more** must be notified to the Local Authority.
Where the school becomes aware of an unreported private fostering arrangement, the DSL will notify Children's Social Care without delay.
Appropriate safeguarding support will then be implemented for the child.

Health & Safety

WhiteTrees Independent School is committed to providing a safe and secure environment in which pupils can learn and thrive.
The school maintains comprehensive Health & Safety and Risk Assessment policies for each school site. Risk assessments are completed for:

- educational visits
- off-site activities
- alternative provision
- vocational placements
- work experience
- curriculum activities
- individual pupils where appropriate.

Where pupils attend alternative provision, WhiteTrees will ensure that:

- safeguarding arrangements are appropriate
- the provider has completed all required safer recruitment and vetting checks
- appropriate written assurances are obtained
- safeguarding responsibilities remain clearly defined
- regular quality assurance and monitoring visits are undertaken.

The school recognises the importance of balancing pupils' privacy with effective safeguarding. Appropriate supervision arrangements will therefore be determined through professional judgement, taking account of pupils' age, developmental stage, SEND needs and individual risk assessments.

Mental Health and Emotional Wellbeing

The School recognises that Mental health concerns may be an indicator that a child has experienced or is at risk of abuse, neglect, exploitation or other adverse childhood experiences. Whilst only appropriately trained professionals should attempt to diagnose mental health conditions, all staff should remain alert to changes in behaviour, presentation or emotional wellbeing which may indicate a safeguarding concern. Staff will remain alert to:

- significant behavioural changes
- emotional distress
- self-harm
- suicidal ideation
- anxiety
- depression
- trauma responses
- persistent absence
- changes in presentation.

Where mental health concerns also constitute safeguarding concerns, staff will:

- record concerns immediately on CPOMS
- inform the DSL without delay ·follow safeguarding procedures.

Where concerns relate solely to wellbeing, staff will discuss the matter with the DSL or appropriate pastoral staff to determine appropriate support.

Acting on Safeguarding Concerns

All staff understand the distinction between:

- a welfare concern
- a Family Help need
- a child at risk of significant harm
- a child in immediate danger.

Where concerns arise:

- concerns must be recorded promptly on CPOMS
- the DSL or Deputy DSL must be informed immediately
- appropriate action will be agreed without delay.

If a child is believed to be at immediate risk of significant harm, staff will contact Children's Social Care and/or the Police immediately if necessary before informing the DSL.

Responding to a Disclosure

When a child discloses abuse, staff will:

- remain calm and reassuring
- listen carefully
- allow the child to speak freely
- avoid asking leading questions
- use open questions only where clarification is essential
- never promise confidentiality
- record the child's own words as accurately as possible
- record the date, time, location and those present
- record relevant observations
- report immediately to the DSL.

Staff will never:

- investigate concerns themselves
- ask a child to write a statement
- ask repetitive or leading questions • photograph injuries
- examine injuries.

The DSL will determine the most appropriate safeguarding response, including referrals to Children's Social Care, Police or other agencies where required.

Confidentiality

The School recognises that safeguarding information is confidential however, safeguarding information will always be shared where necessary to protect a child. Staff understand that:

- confidentiality can never be guaranteed where safeguarding concerns exist
- children should never be promised that disclosures will be kept secret
- safeguarding information will be shared on a **need-to-know** basis
- information sharing decisions will always place the child's welfare first.

Information sharing will comply with:

- UK GDPR
- Data Protection Act 2018
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children
- local safeguarding partnership procedures.

Information Sharing

Effective information sharing is fundamental to safeguarding children.
WhiteTrees will ensure information is:

- timely
- proportionate
- relevant
- accurate
- secure
- recorded appropriately.

The school recognises that poor information sharing has been identified in numerous Child Safeguarding Practice Reviews as a contributing factor in serious child abuse cases.
Staff understand that data protection legislation **does not prevent** appropriate safeguarding information sharing where a child is at risk.
All staff and governors receive regular training regarding:

- information sharing
- confidentiality

- UK GDPR
- safeguarding record keeping.

Records and Monitoring

WhiteTrees uses **CPOMS** as its secure electronic safeguarding recording system. The Designated Safeguarding Lead is responsible for ensuring safeguarding records are:

- factual
- accurate
- contemporaneous
- proportionate
- securely stored
- quality assured.
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The DSL will regularly audit safeguarding records to ensure:

- actions have been completed
- referrals have been followed up
- chronologies remain accurate
- management oversight is clearly evidenced.

The Safeguarding Governor receives appropriate safeguarding reports and undertakes safeguarding audits to provide strategic oversight.

Recording Practice

Staff will:

- Record concerns as soon as possible, and wherever practicable on the same working day
- use CPOMS for all safeguarding concerns
- distinguish clearly between fact, observation and professional opinion
- ensure safeguarding records are completed as soon as practicable and, wherever possible, before the end of the working day, · ensure body maps are completed where necessary
- avoid photographing injuries.

Minor concerns will be recorded and monitored to identify emerging patterns of risk. Professional curiosity and cumulative risk will always inform safeguarding decision-making.

Child Protection Files

Where appropriate, separate safeguarding records will be maintained within CPOMS for:

- Child Protection Plans
- Child in Need Plans
- Children Looked After
- confidential safeguarding concerns.

Each safeguarding record will include:

- chronology
- detailed concern records
- referrals
- multi-agency correspondence
- management oversight
- body maps where appropriate.

The DSL will review safeguarding files regularly to ensure ongoing effectiveness.

Transfer of Safeguarding Records

When pupils move schools, the DSL will ensure safeguarding records are:

- transferred securely
- transferred separately from the educational record
- shared directly with the receiving DSL wherever possible · accompanied by professional discussion where appropriate
- transferred without delay.

Confirmation of receipt will be obtained and recorded.

Pupils with a Social Worker

The School recognises that children who have, or have previously had, a social worker may experience increased safeguarding vulnerability. The DSL will work closely with:

- Children's Social Care
- Family Help Services
- Virtual Schools
- Police
- Health professionals
- other safeguarding partners.

This information will inform decisions relating to:

- attendance
- behaviour
- pastoral support
- curriculum access
- safeguarding interventions.

Children Looked After and Previously Looked After Children

The Designated Teacher and DSL will work collaboratively to ensure that Children Looked After and Previously Looked After Children receive appropriate safeguarding and educational support.
The Designated Teacher will:

- work closely with the Virtual School Head
- support Personal Education Plans (PEPs) ·monitor progress, attendance and wellbeing
- promote educational achievement.

The DSL will ensure safeguarding concerns are managed promptly and effectively.

Opportunities to Teach Safeguarding

Safeguarding is embedded throughout the WhiteTrees curriculum.

Through RSHE, PSHE, Computing and wider pastoral opportunities pupils learn about:

- Healthy relationships
- consent
- online safety
- cyberbullying
- child criminal exploitation
- child sexual exploitation
- county lines
- mental health
- radicalisation
- knife crime
- image-based abuse
- **Generative Artificial Intelligence (AI)**
- deepfakes
- misinformation
- digital resilience.

Parents receive regular online safety guidance through newsletters, coffee mornings and the school website.

Helplines and Reporting

WhiteTrees ensures that pupils, staff and parents know how to access independent safeguarding support.
Information regarding organisations such as Childline, the NSPCC and other safeguarding agencies is displayed throughout the school and made available through the school website. Staff who feel unable to raise safeguarding concerns internally are encouraged to follow the Whistleblowing Policy and may also contact external whistleblowing services where appropriate.

Quality Assurance and Continuous Improvement

WhiteTrees Independent School is committed to continually reviewing and strengthening safeguarding practice.
The DSL, Head Teacher, Executive Headteacher and Safeguarding Governor will undertake regular safeguarding quality assurance activities, including:

- safeguarding audits
- CPOMS file sampling
- policy reviews

- safeguarding supervision
- staff safeguarding questionnaires
- pupil voice
- parent feedback
- annual **filtering and monitoring** review
- review of incidents involving **Generative AI**, deepfakes and technology-facilitated abuse
- governor scrutiny of safeguarding trends.

Appendix 1 – Live Concerns Framework

Purpose

The Live Concerns Framework provides a structured and consistent approach to identifying, monitoring and reviewing pupils whose safeguarding needs require enhanced oversight. The framework supports early identification, effective multi-agency working and timely intervention while recognising that **professional judgement by the Designated Safeguarding Lead (DSL) remains central to all safeguarding decisions**.

A pupil may become a Live Concern because of a single significant safeguarding incident or an accumulation of lower-level concerns which, when considered together, indicate an increased level of vulnerability.

Criteria for Becoming a Live Concern

A pupil may be placed on the Live Concerns Register where one or more of the following applies:

Indicator	Threshold
Attendance	Attendance falls below **85%**, or there is a significant pattern of persistent absence, repeated missing episodes or attendance concerns linked to safeguarding.

Indicator	Threshold
Children's Social Care	A recent referral has been made, statutory involvement has commenced, or there are ongoing safeguarding concerns requiring enhanced monitoring.

CPOMS	There is an increase in the frequency, severity or pattern of CPOMS entries indicating escalating safeguarding concerns.
Professional Judgement	The DSL or Deputy DSL determines that enhanced safeguarding oversight is required, even where the above thresholds have not been met. This may include concerns relating to mental health, online safety, child-on-child abuse, contextual safeguarding, exploitation, radicalisation or emerging vulnerabilities.

Fortnightly Live Concerns Meetings

The Live Concerns Register will be formally reviewed **every two weeks** by the DSL, Deputy DSLs and relevant senior leaders.
The purpose of these meetings is to:

- review current safeguarding concerns
- review attendance, behaviour, welfare and academic progress
- review the CPOMS chronology and identify emerging patterns
- consider contextual safeguarding risks
- review information received from external agencies
- evaluate the impact of interventions
- agree and allocate further actions
- review risk assessments and support plans • determine whether the pupil should:
  - remain a Live Concern
  - be escalated
  - step down from enhanced monitoring.

All decisions, actions and rationale will be clearly recorded on CPOMS.

Closing a Live Concern

A pupil may be removed from the Live Concerns Register where evidence demonstrates that enhanced monitoring is no longer required. This may include:

Indicator	Closure Criteria
Attendance	Attendance has improved significantly and this improvement has been sustained over time.
CPOMS	The frequency and/or severity of safeguarding concerns has reduced,

demonstrating improved wellbeing and reduced risk.

Indicator	Closure Criteria
Children's Social Care	Children's Social Care involvement has ended or statutory intervention is no longer required.
Professional Judgement	The DSL determines, following review of all available information, that enhanced safeguarding monitoring is no longer necessary.

Removal from the Live Concerns Register **does not prevent future monitoring**. Pupils may be re-added at any time should new safeguarding concerns emerge.

Professional Judgement

Safeguarding is dynamic.

Whilst this framework provides clear thresholds, **professional judgement by the Designated Safeguarding Lead remains fundamental** when determining whether a pupil should:

- become a Live Concern
- remain a Live Concern
- be escalated
- be removed from enhanced monitoring.

Safeguarding decisions will always be made in the **best interests of the child**, taking account of all available information, contextual safeguarding factors and professional expertise.

Appendix 2

WhiteTrees Independent School Safeguarding Flowchart

What should you do if you are worried a child is being abused, neglected or is at risk of harm?

Step 1 – Recognise

A member of staff has concerns about a child's welfare.

- Be alert to signs and indicators of abuse.
- Remain professionally curious.
- Consider the wider context.
- Maintain an attitude of **"it could happen here."**

Step 2 – Listen

Where a child discloses abuse or neglect:

- Listen carefully.
- Stay calm.
- Reassure the child they have done the right thing.
- Explain that you must share the information to keep them safe.
- Do **not** promise confidentiality.
- Do **not** ask leading or investigative questions.
- Do **not** inform the alleged perpetrator.

Step 3 – Record

Immediately: • Record the concern factually

using **CPOMS**.

- Record the child's own words wherever possible.
- Record observations separately from professional opinion.
- Alert the DSL and Deputy DSL.

Step 4 – Discuss

The Designated Safeguarding Lead will:

- review the concern
- consider immediate safeguarding risks
- Decide whether community based early help, targeted Family Help or Children's Social Care involvement is required
- consider Police involvement where appropriate
- record all decisions and rationale on CPOMS.

Step 5 – Refer

Where concerns remain:

- Make an immediate referral to Children's Social Care where threshold is met.
- Contact the Police immediately where a child is at immediate risk of harm.
- Continue to support the child throughout the safeguarding process.

Step 6 – Monitor

Where statutory intervention is not required:

- agree appropriate support
- monitor progress
- review safeguarding concerns regularly - continue recording all actions on CPOMS.

Key Contacts

Children's Services (Office Hours)
Telephone: **0300 123 4043**
Emergency Duty Team (Out of Hours)
Telephone: **0300 123 4043**
Police
Emergency: **999**
Non-Emergency: **101**
NSPCC Whistleblowing Advice Line
Telephone: **0800 028**
0285

Appendix 3 – Body Map Guidance

Medical assistance should always be sought where appropriate.

Body Maps should be completed whenever visible injuries require recording. Staff **must never**:

- ask a child to remove clothing unnecessarily
- photograph injuries
- undertake medical examinations.

All concerns must be reported immediately to the Designated Safeguarding Lead and recorded on CPOMS.

Recording Guidance

When recording an injury staff should note:

- exact location
- approximate size
- shape
- colour
- whether skin is broken
- swelling
- bleeding
- blistering
- cleanliness
- mobility restrictions
- temperature of the area
- whether pain is reported
- changes in posture or movement.

Staff should also record:

- date
- time
- name
- role
- factual observations
- the child's own words where appropriate.

Professional opinion should always be clearly identified as such.
Where First Aid is administered this should also be recorded.
The electronic Body Map available within **CPOMS** should always be used wherever possible.

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