
Teikyo School Child Protection & Safeguarding Policy

Policy Name	Child Protection and Safeguarding Policy
Version	17
Policy Type	Statutory
Purpose	This policy explains how the school keeps children safe and promotes their wellbeing. It sets out the responsibilities of all staff, volunteers and visitors, and the procedures to follow when there are concerns about a child's safety or welfare. The policy provides guidance on: • recognising and reporting safeguarding concerns, including abuse, neglect, exploitation, radicalisation and disclosures made by students; • the management of safeguarding across the school; • handling allegations or concerns relating to staff or volunteers; • safer recruitment and the management of visitors; and • supporting staff to act appropriately and confidently in carrying out their safeguarding responsibilities.
Applies to	All staff, governors, volunteers, contractors, agency workers, visitors, including those working with boarding students.
Statutory Guidance and Regulatory Framework	• Keeping Children Safe in Education 2026 (KCSIE) • Working Together to Safeguard Children 2026 • Prevent Duty Guidance: For England and Wales (December 2023) • National Minimum Standards (NMS) for Boarding Schools (May 2026) • Buckinghamshire Safeguarding Children Partnership (BSCP) Procedures and Guidance
Linked Policies	Anti-Bullying Policy, Attendance Policy, Behaviour Policy, Staff Code of Conduct, Data Protection Policy, Online Safety and Acceptable Use Policy, Student Mental Health and Wellbeing Policy, Whistleblowing Policy, PSHE Policy, Relationships and Sex Education (RSE) Policy, Visitor Management Policy and Critical Incident/Intruder Policy.
Owner	Designated Safeguarding Lead (DSL)
Approved by	Headmaster
Reviewed by	Governor's Safeguarding Representative
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SCOPE

This policy applies to all safeguarding and child protection concerns involving pupils of the School. It may also apply, where appropriate, to other children who are connected with or visiting the School, including siblings, members of staff under the age of 18, and children attending activities or events on School premises.

INTRODUCTION FOR PARENTS

At Teikyo School, the safety and wellbeing of every child is our highest priority. All staff and governors share responsibility for safeguarding and promoting the welfare of children.

We aim to:

- provide help and support as soon as concerns arise;
- protect children from abuse, neglect and exploitation, including online;
- support children's physical, mental and emotional wellbeing;
- provide a safe and caring environment; and
- help every child achieve the best possible outcomes.

All staff receive safeguarding training and are expected to report any concerns about a child's welfare. Concerns are normally reported to the School's safeguarding team (see Appendix 1). If necessary, concerns may also be reported to external agencies (see Appendix 2).

If you have any concerns about the safety or wellbeing of a child, please contact the School's Designated Safeguarding Lead (DSL). If you would prefer to discuss your concern in Japanese, please contact the Deputy DSL (DDSL). The DSL and DDSL work closely together to ensure that all children are safe and well supported.

INTRODUCTION FOR STAFF

Staff must always maintain professional relationships with students. Teikyo School values positive and supportive relationships between staff and pupils, but all staff must always maintain appropriate professional boundaries, including with students over the age of 18.

This policy explains:

- how safeguarding is managed within the School;
- what to do if you have concerns about a child's welfare or safety;
- what to do if a child makes a disclosure;
- how concerns about radicalisation, abuse, neglect or exploitation should be reported;
- how allegations against staff or volunteers are managed; and
- the procedures for safer recruitment and visitor management.
- This policy should be read alongside the School's related safeguarding and welfare policies.

Staff Responsibilities

All staff have a responsibility to:

- provide a safe environment in which children can learn and thrive;
- be alert to signs of abuse, neglect, exploitation, or other safeguarding concerns;
- know how to respond if a child shares a concern or makes a disclosure;
- understand the School's safeguarding policies and systems;
- identify children who may benefit from early help or additional support;
- recognise where a child's mental health may be linked to a safeguarding concern;
- maintain appropriate confidentiality and share information when necessary to protect a child;
- complete safeguarding training and keep their knowledge up to date;
- reassure children that concerns will be taken seriously and that they will be supported and kept safe;
- Act in line with the Staff Code of Conduct.

Equality Act 2010

The school will carefully consider how to support students with regard to particular protected characteristics –including disability, sex, sexual orientation, gender reassignment and race – and will take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students with a particular protected characteristic in order to meet their specific need. Some students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. The school will remain vigilant as to these disproportionate vulnerabilities and provide safeguards and support accordingly.

Vulnerable students

The Children Act (1989) defines 'children in need' as those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired without the provision of services of the Act. This includes those who are suffering or likely to suffer significant harm. A person, usually known to the young person (parent, carer or person in institutions or community settings or another child) may abuse, neglect or exploit a child by inflicting harm or failing to act to prevent harm.

Vigilance will be exercised in respect of any 'children with a social worker' (CWSW); that is, any who have been assessed as needing or previously needing a social worker within the past 6 years due to safeguarding and/or welfare reasons. Those students with specific mental or physical health needs which require greater support will also be closely monitored by the safeguarding team.

The school recognises the need for a trauma-informed approach to safeguarding, considering the root causes and possible underlying trauma behind children's behaviour.

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We acknowledge that additional barriers can exist when recognising abuse, neglect or exploitation in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

The school also recognises the additional risks that children with SEND face online, for example, from online bullying, grooming and radicalisation, as well as the fact that children with SEND are potentially more at risk of suffering cases of sexual violence and sexual harassment. The school will therefore ensure that extra pastoral support and attention for these children, along with ensuring any appropriate support for communication, is put in place where necessary.

Early help

Any incident or behavioural change that gives cause for concern should be recorded and passed to the DSL so that an assessment can be made as to whether to access early help.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has Special Educational Needs (whether they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organized crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalized or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves

- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

Mental Health

The School recognises that good mental health is an important aspect of children's overall wellbeing. Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation or other safeguarding concerns. However, mental health concerns should not automatically be viewed as safeguarding concerns.

Where staff are concerned about a child's mental health, they should discuss their concerns with the DSL and, where appropriate, the School's pastoral or mental health staff. The School will consider whether the child requires pastoral support, early help, specialist mental health intervention and/or a safeguarding response. Concerns regarding self-harm, suicidal ideation, eating disorders or other significant mental health difficulties will always be taken seriously and responded to appropriately.

CATEGORIES OF ABUSE

Abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non- consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Definition of Abuse

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where

they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Signs of Abuse

See Appendix 3 for detailed information on the potential signs of abuse.

Physical Abuse

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

Emotional Abuse

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

Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur

during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, shelter and clothing (including exclusion from home or abandonment), failing to protect a child from physical or emotional harm or danger, failing to ensure adequate supervision (including the use of inadequate caregivers) or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as having been frequently absent, or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft. Staff should also be aware that male students are statistically most likely to be at risk in this area, but that trans and non-binary students are also at risk. Indeed, staff should not assume that girls are not at risk in this area and are encouraged to see behaviour as the primary indicator of risk.

Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)

These are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CSE is a form of sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological (including coercive control), physical, sexual, economic or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

A child may suffer, or be at risk of suffering, from one or more types of abuse and abuse may take place on a single occasion or may occur repeatedly over time. In all cases the Child in Need/Child Protection procedure should be followed, or that of the authority in which the child is normally resident.

FGM (Female Genital Mutilation)

All staff must speak to the DSL about any concerns, but where a teacher, in the course of their professional duties, discovers that an act of FGM appears to have been carried out on a child under the age of 18 the teacher must personally report this to the police.

Child-on-child abuse

All staff should recognise that children can abuse their peers (including online) and that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. All child-on-child abuse is unacceptable and will be taken seriously. The school has a zero-tolerance approach to child-on-child abuse.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as
- sexting or youth produced sexual imagery).
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Students are informed of the range of avenues to reporting abuse but are encouraged in the first instance and where appropriate to report any concerns they have for themselves or others to their Tutor. They are also made aware that they can report abuse to any member of staff in the knowledge that their concerns will be taken seriously. It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Measures to minimise risk

In addition to measures set out in the Anti-Bullying policy to promote a kind, considerate and tolerant environment for students, the school seeks to minimise the risk of child-on-child abuse through:

- education via assemblies and the RSE programme
- appropriate supervision of students
- due consideration of the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation, including the fact that boarders who are being bullied (offline) cannot escape their bullies for long periods of time as they are not going home as often
- providing a range of avenues for student voice and different ways for students to report concerns, including anonymously
- taking a proactive and visible approach to dealing with microaggressions and other ‘low level’ forms of abuse
- reminding staff of the need to be vigilant and report any concerns to the DSL

RESPONSE TO ALLEGATIONS

It is essential all victims are reassured that they are being taken seriously, regardless of how long it has taken them

to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The school's response to incidents of child-on-child abuse will in the first instance be guided by its Anti-Bullying and Behaviour Policies and may, where appropriate, also involve a referral to other agencies such as the police or Children's social care. A bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. In such cases, it will be assumed that all the students involved are at risk. Allegations of sexual violence and sexual harassment will be dealt with according to the relevant guidance in KCSIE. Response to online safety concerns will be guided by advice from the Buckinghamshire Safeguarding Children Partnership (BSCP), the relevant sections of KCSIE and UKCIS guidance on 'Sharing nudes and semi-nudes'.

All concerns are recorded on the Safeguarding Drive, and the DSL leads the response, involving other pastoral staff where appropriate. The DSL maintains a record of cases of child-on-child abuse and reviews these on a regular basis with the DDSL to consider lessons learnt.

If a student makes a direct allegation or disclosure:

- Reassure the student that they have been heard. The young person needs to know what will happen next (as far as the school is concerned) and should not be given any false reassurance that the matter can necessarily be kept confidential between the young person and staff member.
- Allow the child or young person to make the disclosure at their own pace and in their own way.
- Avoid interrupting except to clarify what the child is saying.
- Do not ask leading questions or probe for information that they do not volunteer.
- Use TED: Tell (me...), Explain (what...), Describe (what...)
- As soon as possible, record as much detail as possible. Avoid trying to write everything down at the time as important information may be missed.

- Inform the DSL.

It is important to note that the school is not an investigative agency, and young people should not be physically examined or made to repeat their allegation to too many different people. This is the task of the Children's social care and, if necessary, the Police.

RECORD KEEPING AND PREPARING EVIDENCE

Good record keeping is essential in ensuring children's ongoing welfare and safety are promoted and monitored. All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing and be recorded on the Safeguarding drive.

Records should include:

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

Confidentiality and information sharing

The school recognises its duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within Keeping Children Safe in Education (KCSIE) and Working Together to Safeguard Children (WTSC).

The school has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our setting is compliant with all matters relating to confidentiality and information sharing requirements.

All staff:

- are made aware of the need to protect the privacy of the children in their care, as well the legal requirements that exist to ensure that information relating to the child is handled in a way that ensures both confidentiality and safeguarding, and school policy in this area.
- will ensure there is an area where staff may talk to parents and/or carers confidentially.
- are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.
- are made aware of their professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.

- will be provided with training and information to ensure they understand and have due regard to the relevant data protection principles which allow them to share and/or withhold personal information.

The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on schools/colleges and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

The headteacher and DSL will disclose relevant safeguarding information about a pupil/student with staff on a 'need to know' basis.

Referrals

Staff must report to the DSL any concern or allegation regarding school practices or the behaviour of colleagues that may place a child at risk of harm. Whilst responsibility for safeguarding referrals and liaison with external agencies normally rests with the Headmaster and DSL, any member of staff may make a referral to Children's Social Care, the Police, or another appropriate safeguarding agency if they believe this is necessary to protect a child. Staff should do so without delay where there is an immediate risk of harm or where they believe that a safeguarding concern previously reported through the School's procedures has not been appropriately addressed.

Concerns may also be raised under the School's Whistleblowing Policy. Where there is a risk of immediate serious harm to a child, a referral must be made to Children's Social Care and/or the Police without delay. The DSL will monitor the progress of referrals and escalate concerns where responses are considered inadequate. If a child's circumstances do not appear to be improving, staff should continue to raise and escalate concerns until they are satisfied that appropriate action has been taken and the child receives the help and protection they need.

Children who are absent from education and children missing education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The school's response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

The school has procedures in place to identify and respond to students who go missing, particularly on repeat occasions. A record of student attendance is held and managed by the Student Coordinator and all absences are followed up by the Tutor. Unauthorised absences may be a safeguarding issue and, where not resolved via routine investigation by the school, must be reported to the DSL. The school usually holds home, mobile and work phone numbers of both parents and will always endeavour to keep at least two emergency numbers for each student on roll.

The school notifies the local authority:

- if any student fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 days or more.
- of all students who join or leave the school at non-standard transition times and when students leave the school before the age of 18 if the school does not know which school they are joining.

Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection.

Protecting children from this risk is a part of the school's safeguarding approach; all staff receive appropriate training to enable them to be alert to changes in children's behaviour which could indicate that they may need help or protection. Staff will be supported in using their judgement in identifying children who might be at risk of radicalisation and acting proportionately. Concerns should be reported to the DSL (or a deputy) who will consider the appropriate next steps, which might include a Prevent referral or, in the event of an immediate threat to safety, contacting the Police via 999.

Online Safety

The school has a comprehensive Online Safety and Acceptable Use Policy, which should be read in conjunction with this policy.

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviour online. The school adopts a whole-school approach to online safety which will empower, protect and educate students and staff in their use of technology, with mechanisms in place to identify, intervene in and escalate any concerns where appropriate.

The school recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of all aspects of its online safety provision, which will be shared with the Governing Body.

MANAGEMENT OF SAFEGUARDING

The Governing Body

The Governing Body¹ is responsible for ensuring that the school adopts a whole-school approach to safeguarding and child protection. Safeguarding arrangements must place the welfare and best interests of children at the centre of decision-making and underpin all relevant policies, procedures and practices.

The Governing Body will ensure that the school complies with all relevant safeguarding legislation and statutory guidance, including Keeping Children Safe in Education (KCSIE), Working Together to Safeguard Children, the Independent School Standards, and the procedures of the Buckinghamshire Safeguarding Children Partnership (BSCP).

The Governing Body will ensure that:

- appropriate safeguarding and child protection policies and procedures are in place, implemented effectively and reviewed at least annually;
- a suitably trained Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) are appointed and provided with sufficient time, resources, training and authority to carry out their responsibilities;
- safer recruitment procedures are implemented and monitored;
- effective procedures exist for managing allegations against adults working with children and for responding to children who are missing from education;
- appropriate filtering and monitoring systems are in place to safeguard children online;
- safeguarding is considered in all relevant policy development and decision-making;
- children are provided with safe, accessible and well-publicised mechanisms for reporting concerns and are confident that concerns will be taken seriously;
- all staff, volunteers and governors receive appropriate safeguarding and child protection training and updates.

The Governing Body will ensure that all staff, including teaching staff, support staff, supply staff, volunteers and governors, read and understand, as a minimum, Part One of Keeping Children Safe in Education. Staff whose responsibilities require additional safeguarding knowledge, including the DSL, DDSLs and members of the Senior Leadership Team, will receive further training appropriate to their roles.

¹ The General Manager, Headquarters staff and Governors together fulfil the governance and oversight functions of the School. Ultimate governance authority rests with the three principal Governors.

All governors will receive safeguarding and child protection training, including online safety and filtering and monitoring responsibilities, at induction and at regular intervals thereafter. This training will equip governors to provide effective oversight, challenge and support and to satisfy themselves that safeguarding arrangements remain effective.

The Governing Body will ensure that children are taught safeguarding, including online safety, through the curriculum, Relationships and Sex Education (RSE), Personal, Social, Health and Economic (PSHE) education, assemblies and wider pastoral provision.

The Governing Body has appointed Takumi Hiraga as the Governor's Safeguarding Representative. The Governor's Safeguarding Representative will meet regularly with the DSL, provide appropriate challenge and support, and report to the Governing Body on the effectiveness of the school's safeguarding arrangements.

The DSL will provide safeguarding reports to the Governing Body at least annually, including information relating to safeguarding trends, training, policy reviews, online safety, filtering and monitoring, and any actions required to strengthen safeguarding practice. The Governing Body will review and approve this policy annually, or sooner if there are changes to legislation, statutory guidance or local safeguarding arrangements.

Safeguarding Governance and Oversight

The School recognises that effective safeguarding requires ongoing monitoring, scrutiny and continuous improvement. Safeguarding forms part of the School's risk management, quality assurance and governance processes.

The Governing Body, supported by the Governor's Safeguarding Representative, maintains strategic oversight of safeguarding arrangements and receives regular reports from the DSL. This oversight includes monitoring:

- safeguarding incidents, concerns and trends;
- the effectiveness of safeguarding policies and procedures;
- staff training and compliance;
- online safety, filtering and monitoring arrangements;
- attendance and children missing education;
- safeguarding arrangements for boarders;
- the management of allegations and low-level concerns relating to adults working in the School;
- engagement with external safeguarding agencies; and

- lessons learned from safeguarding incidents, reviews or audits.

The School will regularly review safeguarding practice in light of statutory guidance, local safeguarding partnership procedures, inspection findings and emerging risks. Where improvements are identified, appropriate actions will be implemented and monitored by the Senior Leadership Team and Governing Body.

Designated Safeguarding Lead

The School's Designated Safeguarding Lead (DSL) is Anthony Davies, a member of the Senior Leadership Team. Wakako Yachidate is the Deputy Designated Safeguarding Lead (DDSL) and will act in the DSL's absence, ensuring safeguarding leadership and decision-making is always available. Contact details for both the DSL and DDSL can be found in Appendix 1.

The DSL has overall responsibility for safeguarding and child protection within the school. The DSL is the first point of contact for staff regarding safeguarding concerns and provides advice, guidance and support to ensure concerns are identified, recorded, reported and managed appropriately. The DSL maintains oversight of safeguarding practice across the school, monitors the effectiveness of safeguarding policies and procedures, and works with the Headmaster and Governing Body to review and develop the school's safeguarding arrangements. The DSL also has lead responsibility for online safety, including oversight of the school's filtering and monitoring systems and the appropriate response to concerns identified through these systems. Any safeguarding concerns arising from filtering or monitoring will be reported directly to the DSL and be managed in accordance with the School's Online Safety and Acceptable Use Policy.

The DSL is responsible for maintaining effective relationships with safeguarding partners and external agencies. Where appropriate, the DSL may seek advice from, liaise with, or make referrals to children's social care, the Multi-Agency Safeguarding Hub (MASH), the Local Authority Designated Officer (LADO), the police, the Disclosure and Barring Service (DBS), and the Prevent programme, including Channel. The DSL may contact these agencies directly where there are concerns regarding a child's welfare, allegations against adults working with children, radicalisation risks, or other safeguarding matters requiring external intervention or specialist advice.

The DSL will work in partnership with local safeguarding partners and other relevant agencies in accordance with statutory guidance, including Working Together to Safeguard Children and Keeping Children Safe in Education. The DSL will also liaise with the School's Senior Mental Health Lead and other specialist services where safeguarding concerns are linked to a child's mental health and will maintain knowledge of local services available to support children affected by abuse, exploitation, sexual violence or sexual harassment.

During term time, the DSL or DDSL will always be available during school hours to discuss safeguarding concerns. Where they are not immediately available in person, they can be contacted by telephone or electronic means. Appropriate safeguarding cover will also be

available during educational visits, boarding provision, and activities taking place outside normal school hours.

The DSL is responsible for ensuring safeguarding records are maintained securely and appropriately. When a student transfers to another school, the DSL will ensure that the child protection file is transferred separately from the main pupil file and within statutory timescales, obtaining confirmation of receipt. Where appropriate, additional safeguarding information may be shared with the receiving school to support a safe transition and ensure the student's needs continue to be met.

The DSL regularly reviews safeguarding concerns, trends, procedures and practice to ensure the school's safeguarding arrangements remain effective. All staff have a professional responsibility to report safeguarding concerns to the DSL without delay. Where a member of staff believes that appropriate action has not been taken, they should follow the School's whistleblowing procedures and may refer concerns directly to children's social care, the police or other relevant agencies.

Whilst the Headmaster is responsible for ensuring safeguarding policies and procedures are implemented effectively, and Governors provide oversight and challenge regarding safeguarding practice, the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

TRAINING

Induction and training are in line with advice from the Safeguarding Partnership.

All Staff

All staff will be provided with induction training that includes:

- Reading Part One of Keeping Children Safe in Education (KCSIE);
- Reading and understanding the school's safeguarding and child protection policy, staff code of conduct, and relevant safeguarding procedures;
- Training on safeguarding, child protection, staff behaviour expectations, and procedures for reporting concerns;
- the School whistleblowing policy;

In addition, teaching staff will receive:

- the online safety and acceptable use policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- the school rules and anti-bullying policy;
- the staff code of conduct and communication with students' policy;
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, and
- the role of the designated safeguarding lead (including the identity of the designated

safeguarding lead and any deputies).

Copies of the above documents are provided to all staff during induction and remain available on the school's policy drive.

Routinely: All staff will receive updates on policy changes through school staff meetings and support staff team meetings, and via email and bulletins as required.

Annually: All staff, including those who do not work directly with children, must read and understand Part One of Keeping Children Safe in Education (KCSIE). The Headteacher, Designated Safeguarding Lead (DSL), Deputy DSLs, and Governors/Proprietors will ensure that they are familiar with the full statutory guidance and any sections relevant to their role and responsibilities.

Tri-annually: All staff will attend a day's training on Child Protection Awareness delivered by the Buckinghamshire Council Safeguarding Partnership (BCSP).

Temporary staff and volunteers will (as a minimum):

- Read Part one of *KCSIE* and confirm that they have done so.
- Receive training in safeguarding and child protection regularly, in line with advice from the Safeguarding Partnership. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails, e-bulletins, and staff meetings.

The Governing Body is aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

DSL's

The DSL and DDSL are trained to the same level training in accordance with KCSIE requirements and ensure their knowledge and skills are updated regularly, including formal training and at least annual updates.

The DDSL is trained to the same level as the DSL.

ALLEGATIONS AGAINST STAFF, VOLUNTEERS AND OTHER ADULTS

Purpose

The School is committed to safeguarding and promoting the welfare of children and expects all staff, volunteers, contractors, governors and other adults working with children to maintain the highest standards of professional conduct. Children can be harmed by adults working in positions of trust and it is therefore essential that any concern, allegation or low-level concern relating to an adult's behaviour is recognised, reported and managed promptly, fairly and in accordance with statutory guidance.

This section sets out the procedures for responding to allegations and concerns relating to adults working in the School, including concerns that may indicate a risk of harm to children. It aims to ensure that children are protected, concerns are handled consistently and transparently, and that all individuals are treated fairly throughout the process.

Low-level concerns

The School recognises that creating and maintaining a culture of openness, trust and transparency is essential to safeguarding children. As part of this culture, all staff are encouraged and expected to report any low-level concern about the conduct of an adult working in the School.

A 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 manner that is inconsistent with the Staff Code of Conduct, including behaviour that does not meet the harm threshold for managing allegations against staff but may nevertheless indicate that professional boundaries have not been maintained.

Examples of low-level concerns may include, but are not limited to:

- being over-familiar with a child;
- having favourites;
- engaging in inappropriate one-to-one contact;
- using inappropriate language;
- breaching the School's policies on electronic communications or social media;
- taking photographs of children without appropriate authorisation;

- failing to maintain appropriate professional boundaries; or
- behaviour that could be perceived as unprofessional, unsafe or contrary to the Staff Code of Conduct.

Any low-level concern should be reported promptly to the Headmaster. Where the concern relates to the Headmaster, it should be reported to the Chair of Governors through the Governor's Safeguarding Representative. Low-level concerns will be recorded, reviewed and managed appropriately to identify any patterns of behaviour and to ensure that concerns are addressed at an early stage.

The purpose of reporting low-level concerns is not to attribute blame, but to promote a culture of vigilance and accountability, protect children, support staff in maintaining appropriate professional standards, and enable the School to identify concerning patterns of behaviour before they escalate.

Allegations That May Meet the Harm Threshold

Where information suggests that a concern may meet the harm threshold, or where a pattern of low-level concerns indicates a potentially greater safeguarding risk, the matter will be managed in accordance with the procedures for allegations against staff and, where appropriate, referred to the Local Authority Designated Officer (LADO).

An allegation is considered to meet the harm threshold where it is alleged that an adult working in the School has:

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

Safeguarding concerns relating to adults may arise from behaviour within or outside the workplace. This may include conduct in an individual's personal life, online activity, behaviour towards other adults, or behaviour which does not directly involve children, where such conduct may indicate that the individual could pose a risk to children or may be unsuitable to work with children. The School will assess such concerns on a case-by-case basis and seek advice from the Local Authority Designated Officer (LADO) where appropriate.

Reporting routes

Any concern, allegation or low-level concern relating to the conduct of an adult working in the School must be reported immediately and without delay.

Concerns relating to a member of staff, volunteer, contractor, supply worker or other adult working in the School should be reported to the Headmaster.

Concerns relating to the Designated Safeguarding Lead (DSL) should be reported to the Headmaster.

Concerns relating to the Headmaster should be reported directly to the Chair of Governors through the Nominated Safeguarding Representative.

Concerns relating to a Governor, including the Nominated Safeguarding Representative, should be reported to the Chair of Governors. Concerns relating to the Chair of Governors should be reported directly to the Local Authority Designated Officer (LADO). The LADO will provide independent advice and determine any appropriate safeguarding response, referral or investigation.

Where a concern or allegation may meet the harm threshold, the Headmaster (or Chair of Governors where the allegation concerns the Headmaster) will seek advice from, and where appropriate make a referral to, the Local Authority Designated Officer (LADO) before any investigation is commenced.

If there is an immediate risk of harm to a child, a referral will be made immediately to Children's Social Care, the Multi-Agency Safeguarding Hub (MASH) and/or the Police, and the DSL will be informed as soon as possible.

No member of staff should attempt to investigate an allegation themselves or discuss the matter with colleagues beyond those who need to know to protect children and manage the concern appropriately.

Staff may also refer concerns directly to the Local Authority Designated Officer (LADO), Children's Social Care, the Police or the NSPCC Whistleblowing Advice Line if they believe a concern is not being addressed appropriately through the School's procedures.

Suspension and risk management

The welfare of children will always be the School's paramount consideration. Where an allegation has been made against a member of staff, volunteer or other adult working in the School, the School will assess any potential risk to children and take appropriate steps to safeguard those involved whilst the matter is being considered.

Suspension will not be an automatic response to an allegation and will only be considered where there is no reasonable alternative to protect children, preserve the integrity of any investigation, or safeguard the individual concerned. Before deciding regarding suspension, the Headmaster (or the Chair of Governors where the allegation relates to the Headmaster) will seek advice from the Local Authority Designated Officer (LADO) where appropriate.

- Alternative arrangements may be considered before suspension, including:

- redeployment to duties that do not involve direct contact with children;
- increased supervision or management oversight;
- temporary changes to working arrangements;
- restrictions on access to particular areas, activities or systems; or
- other measures considered necessary to safeguard children and manage risk.

Any decision to suspend will be considered carefully and reviewed regularly. Suspension is a neutral act and does not imply that any allegation has been substantiated or that disciplinary action will follow.

The School will provide appropriate support to any child who may have been affected by the alleged conduct and will take reasonable steps to support the member of staff, volunteer or other adult who is the subject of the allegation. The School will also consider the welfare and support needs of others affected by the allegation, including witnesses and colleagues.

Where an allegation may constitute a criminal offence, involve significant safeguarding concerns, or require external investigation, the School will work closely with the LADO, Police, Children's Social Care, the Multi-Agency Safeguarding Hub (MASH) and any other relevant agencies to ensure risks are managed appropriately and statutory procedures are followed.

Throughout the process, the School will maintain confidentiality, share information on a need-to-know basis, and keep written records of risk assessments, decisions and actions taken.

Confidentiality, Information Sharing and Record Keeping

The School recognises the importance of maintaining appropriate confidentiality whilst ensuring that information is shared promptly and lawfully where necessary to safeguard and promote the welfare of children. All staff must understand that safeguarding concerns should never be kept secret and that the protection of children takes precedence over promises of confidentiality.

Staff must not guarantee confidentiality to a child who discloses abuse or another safeguarding concern. Children should be reassured that they will be listened to, taken seriously and supported, but that information may need to be shared with those who can help keep them safe.

The School will share information with relevant professionals and agencies where it is necessary to protect a child or promote their welfare. This may include Children's Social Care, the Multi-Agency Safeguarding Hub (MASH), the Local Authority Designated Officer (LADO), the Police, health professionals and other safeguarding partners. Concerns about data protection must not prevent the timely sharing of information where there is a safeguarding concern.

All safeguarding concerns, disclosures, allegations, low-level concerns, discussions, decisions and actions will be recorded promptly, accurately and stored securely. Records should include:

- a clear and factual account of the concern or allegation;
- the date, time and circumstances in which the information was received;
- details of any discussions held;
- decisions made and the reasons for those decisions;
- actions taken and referrals made; and
- the outcome of any investigation, intervention or follow-up activity.

Safeguarding records will be held separately from the main pupil, or personnel files and access will be restricted to those who have a legitimate safeguarding need to know. Records will be retained, transferred and disposed of in accordance with statutory guidance, data protection requirements and the School's records retention procedures.

Where concerns relate to an adult working in the School, including allegations and low-level concerns, records will be maintained in accordance with statutory guidance and retained for the appropriate period to ensure that any patterns of behaviour can be identified and safeguarding decisions can be properly evidenced.

The Designated Safeguarding Lead (DSL) is responsible for overseeing safeguarding records, ensuring appropriate information sharing, monitoring the quality of safeguarding documentation, and ensuring records are transferred securely when a pupil moves to another school.

Outcome of Investigations

Allegations will be concluded in accordance with statutory guidance and recorded as:

- Substantiated;
- Unsubstantiated;
- Unfounded;
- False; or
- Malicious.

The School will consider whether any lessons can be learned from the case and whether any changes are required to policies, procedures, training or safeguarding practice.

DBS and TRA referrals

The School has a legal duty to make referrals to external agencies where safeguarding concerns meet the relevant statutory thresholds.

Where the School ceases to use the services of a member of staff, volunteer, contractor or other individual because they have harmed a child or may pose a risk of harm to a child, the School will make a referral to the Disclosure and Barring Service (DBS) as required by law. A referral will be made whether the individual resigns, ceases to provide their services, is dismissed, redeployed, or otherwise leaves the School before disciplinary or safeguarding procedures have been concluded.

Where concerns relate to a teacher and there is evidence of serious misconduct, the School will consider whether a referral should be made to the Teaching Regulation Agency (TRA). The School may also refer cases where a teacher has been dismissed, would have been dismissed had they not resigned, or where prohibition from teaching may be appropriate.

The School will work with the Local Authority Designated Officer (LADO), the Police, Children's Social Care, the Multi-Agency Safeguarding Hub (MASH) and other relevant agencies when managing allegations that may involve safeguarding risks, criminal conduct or professional misconduct.

The decision to make a referral to the DBS, TRA or another external agency will not be delayed by an individual's resignation or departure from the School. Appropriate records of all referrals, decisions and actions taken will be maintained by the School.

WHISTLEBLOWING

The School expects all safeguarding concerns, allegations and disclosures to be taken seriously and responded to promptly, appropriately and proportionately. Staff who raise safeguarding concerns in good faith will be supported and their concerns will be considered in accordance with the School's safeguarding procedures.

If any member of staff believes that a safeguarding concern, allegation or disclosure has not been appropriately addressed, or that a child remains at risk of harm, they must escalate their concerns without delay. Staff should refer to the School's Whistleblowing Policy, which sets out the procedures for reporting concerns about safeguarding practice, the conduct of colleagues, or the management of safeguarding matters.

No member of staff will suffer detriment for raising a genuine safeguarding concern. Where appropriate, staff may also raise concerns directly with external agencies, including Children's Social Care, the Local Authority Designated Officer (LADO), the Police, Ofsted, the Independent Schools Inspectorate (ISI) or the NSPCC Whistleblowing Advice Line.

RECRUITING

All recruiting will be in line with the school's Recruitment, Selection and Disclosures Policy and Procedure, which includes:

- enhanced DBS checks
- barred list checks
- references
- identity checks
- qualifications
- prohibition orders
- overseas checks

Information confirming that all staff have been checked against and met the above criteria will be held in a single central register (SCR).

Contractors, volunteers and agency staff

The School recognises that contractors, volunteers and other individuals who are not employed directly by the School may nevertheless have access to children during their work or activities. Appropriate safeguarding arrangements will therefore be implemented to ensure that children remain safe.

The School will undertake appropriate risk assessments and suitability checks for contractors and volunteers in accordance with statutory guidance, the School's Recruitment Policy and procedures relating to the Single Central Register (SCR).

Contractors and volunteers who have regular contact with children, work unsupervised, or engage in regulated activity will be subject to the appropriate safeguarding checks before commencing their duties. Where contractors' employees have been vetted by their employer, the School will seek appropriate assurance that the required checks have been completed.

All contractors, volunteers and visiting professionals will be expected to comply with the School's safeguarding arrangements, including visitor procedures, staff conduct expectations, and reporting requirements. They will be provided with safeguarding information appropriate to their role and must report any safeguarding concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL).

The level of supervision and safeguarding checks required will be determined by the nature of the individual's role, their level of contact with children, and the relevant statutory guidance in force at the time.

THE SCHOOL'S COMMITMENT TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The Headmaster ensures that all students receive appropriate safeguarding education through the curriculum, including Personal, Social, Health and Economic (PSHE) Education, Relationships and Sex Education (RSE), and online safety teaching. Through these areas of learning, students are supported to understand risk, develop resilience, and make informed decisions that help keep them safe both in and outside of school, including from the risks of radicalisation.

This includes teaching students about the safe and responsible use of technology, the internet and social media, and helping them to recognise and respond appropriately to risks such as bullying, grooming, abuse, exploitation and radicalisation. The School recognises that a "one size fits all" approach may not be appropriate for all children. More personalised or contextualised safeguarding education may therefore be required for vulnerable students, students with SEND, and those who have experienced abuse or other adverse experiences.

Online safety is an integral part of the School's curriculum. Specific aspects are delivered through computing and ICT lessons, while broader themes relating to digital citizenship, wellbeing, relationships, personal safety and responsible online behaviour are embedded within the School's PSHE and RSE programmes.

Online Filtering and monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the Schools IT systems.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises that children may have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. This will be mitigated by the School becoming a mobile phone-free environment from 1 September 2026, together with a whole-school approach to online safety. Through the curriculum, PSHE, RSE and pastoral provision, students are taught how to use technology safely, responsibly and respectfully; to recognise and manage

online risks; to understand the impact of their actions on others; and to report concerns, including cyberbullying, harassment, exploitation and inappropriate online content. Students are expected to use technology in a manner consistent with the School's values and Anti-Bullying Policy.

The School complies with the DfE's 'filtering and monitoring standards for schools' by:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

The School filtering and monitoring arrangements ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School systems. Systems will be tested once a month by the DSL.

Looked after children and previously looked after children

The school proprietor ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority. Rueko KURIKI is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training to carry out their role.

The School recognises that looked after children and previously looked after children (PLAC) may face additional safeguarding and educational challenges. Previously looked after children include those who have left care through adoption, special guardianship orders or child arrangements orders. The designated member of staff will work with the DSL, local authorities, parents, carers and relevant professionals to help safeguard and promote the welfare, achievement and wellbeing of these children.

Boarding Safeguarding Arrangements

The School recognises that boarders may face additional safeguarding and welfare risks due to the residential nature of boarding provision. Appropriate safeguarding arrangements are in place at all times, including outside normal school hours.

Boarders have access to suitably trained boarding and safeguarding staff, know how to report concerns, and are able to contact parents, guardians and external support services where appropriate. Safeguarding concerns arising within the boarding environment will be managed in accordance with this policy and the requirements of the National Minimum Standards for Boarding Schools.

The Designated Safeguarding Lead (DSL) works closely with boarding staff to ensure effective communication, information sharing and oversight of safeguarding concerns relating to boarders. Particular attention is given to children living away from home, overnight supervision arrangements, student welfare, child-on-child abuse, online safety and the wellbeing of vulnerable students.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to assess the appropriateness before agreeing to a Visiting Speaker being allowed to attend the School. This will consider any vetting requirements considered appropriate in the circumstances.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Arrangements for use of School premises for non-school activities

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSLs can be contacted or are available at all times the school premises are in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (April 2022) and '*After school clubs, community activities, and tuition (safeguarding guidance for providers)*' (September 2023).

Operation Encompass

The School participates in Operation Encompass, a partnership between the police and education settings which supports children affected by domestic abuse. Where police attend a domestic abuse incident and identify that a pupil may have been affected, they may notify the School's DSL (or Deputy DSL) before the start of the next school day.

The DSL will consider any notification received and determine what support or safeguarding action is required. Information shared through Operation Encompass will be treated as confidential and handled in accordance with the School's safeguarding and data protection procedures.

Appendix 1 – Key School Safeguarding Contacts

Designated Safeguarding Lead (DSL)	Anthony Davies Tel: 01753 663756 Email: anthony.davies@teikyofoundation.com
Deputy DSL	Wakako Yachidate Tel: 01753 663712 EMAIL: wakako.yachidate@teikyofoundation.com
Headmaster	Yukihiro Hamada Tel: 01753 980508 Email: yukihiro.hamada@teikyofoundation.com
Designated Teacher for Looked After and Previously looked After Children (Welfare Officer)	Rueko Kuriki Tel: 01753 980505 Email: rueko.kuriki@teikyofoundation.com
Nominated Safeguarding Governor	Takumi Hiraga Tel: 01753 980507 Email: takumi.hiraga@teikyofoundation.com
Chair of Governors	Yoshihito Okinaga Tel: 03 3964 9044 Email: 平山陽一郎 y-hirayama@teikyo-u.ac.jp

Appendix 2 – Key External Safeguarding Contacts

Local Authority Designated Officer	Tel: 01296 382070 Email: Secure-LADO@buckinghamshire.gov.uk 9am-5pm (Mon-Thu), 4.30pm Friday.
Local Authority Children's Multi-Agency Safeguarding Hub (MASH)/First Response	Tel: 01296 383962 9am-5pm (Mon-Thu), 4.30pm Friday.
Adult Safeguarding Team	Tel: 0800 137915
Emergency Duty Team (EDT) Outside normal hours – Children and Adults.	Tel: 0800 999 7677
Prevent and Radicalisation concerns	Police (www.thamesvalley.police.uk) For advice regarding extremism or radicalisation: National Prevent Advice Line: 0800 011 3764 For Prevent referrals: preventreferralsaylesbury@thamesvalley.police For concerns relating to a child: Buckinghamshire First Response Team (MASH): 01296 383962 Out of Hours Emergency Duty Team: 0800 999 7677 For emergency situations or immediate risk: 999 Department for Education (DfE) www.gov.uk/guidance/regional-prevent-education-coordinators
NSPCC Whistleblowing Advice Line	Tel: 0800 028 0285 Email: help@nspcc.org.uk
NSPCC Report Abuse in Education Advice Line	Tel: 0800 136 663 Email: help@nspcc.org.uk Website: www.nspcc.org.uk/keeping-children-safe/
Disclosure and Barring Service	Tel: 03000 200 190 Email: customerservices@db.s.gov.uk Website: www.gov.uk/db.s
Teaching Regulation Agency For reporting teacher misconduct	Tel: 0207 593 5393 Email: misconduct.teacher@education.gov.uk Website: www.gov.uk/guidance/teacher-misconduct-referring-a-case
OFSTED Safeguarding Children	Tel: 0300 123 4666 (Mon – Fri, 8am to 5pm) Email: CIE@ofsted.gov.uk Website: www.ofsted.gov.uk
Independent Schools Inspectorate (ISI)	Tel: 0207 600 0100 Email: concerns@isi.net

APPENDIX 3 – Potential signs of abuse

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

PHYSICAL ABUSE

Determining whether an injury is accidental or non-accidental is a skilled job. It requires a full assessment of the injury, explanation, history and circumstances. Our Welfare Officer is available (in the first instance) should a staff member need to refer/discuss a child who they deem to have one or more of the physical/behavioural indicators listed below.

There are many injuries which should be regarded with concern and may indicate a non-accidental cause. Some may need medical assessment and treatment, occasionally urgently. Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations, or a delay in seeking treatment for the child, should signal concern.

Physical indicators

- Unexplained injuries or burns, particularly if they are recurrent
- Untreated injuries or lingering injuries not attended to
- Bruises and abrasions around the face, particularly if they are recurring
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft areas of the face, e.g. cheeks
- Bite marks
- Burns or scalds (note the pattern and spread of the injury, e.g. cigarette burns)
- Wheals suggesting beatings

Behavioural indicators

- Improbable excuses given to explain injuries, or refusal to discuss injuries
- Admission of punishment which appears excessive
- Shrinks from physical contact
- Refusal/avoiding getting undressed for gym – keeps arms and legs covered in hot weather
- Fears medical help

- Self-harming behaviours
- Aggression towards others
- Over compliant behaviour or a 'watchful' attitude
- Deterioration in schoolwork
- Unexplained pattern of absences which may serve to hide bruises or other physical injuries
- Fears or is reluctant to return home or to have parents contacted

EMOTIONAL ABUSE

Emotional abuse is often the most difficult to detect. A child might be clean and physically cared for but be emotionally neglected.

The parents' or carer's attitude to the child might be characterised by coldness, hostility, disinterest. They may resort to scapegoating or humiliating the child and the giving of age-inappropriate responsibilities. They may give the impression that the child can never please, or may have expectations which are inappropriate, excessive or unrealistic.

Physical indicators

- Delays in physical development, e.g. milestones delayed for underweight, lethargic (there may be medical reasons for this, medical advice is essential)
- Self-mutilation

Behavioural indicators

- Delays in intellectual development
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Social isolation – does not join in and has few friends
- Extremes of compliance, passivity and/or aggression/provocativeness
- Compulsive stealing, e.g. other children's packed lunches
- Rocking, thumb sucking, hair twisting, etc.
- Drug, alcohol, solvent abuse
- Fear of parents being contacted

SEXUAL ABUSE

Sexual abuse affects a child or young person emotionally and physically. It is difficult to detect as the physical indicators are not directly visible. Often the indicators that a child is being sexually abused are exhibited through behaviour. Sexual abuse occurs in every class, cultural and occupational group. Sexually abused children may take refuge in an appearance of normality, e.g. some children immerse themselves in schoolwork as a way of 'blanking out' the abuse.

Physical indicators

- 'Love bites'

- Other bite marks
- Self-harming behaviours (e.g. deep scratches/cuts on arms)
- Tiredness, lethargy
- Pregnancy or Sexually Transmitted Infections (STIs)

Behavioural indicators

- Sudden changes in behaviour and school performance
- Sexual awareness inappropriate to the child's age – shown for example in drawings, vocabulary, games, etc.
- Provocative sexual behaviour
- Frequent public masturbation
- Fear of undressing for gym
- Tendency to cry easily
- Regression to younger behaviour, e.g. thumb sucking, playing with discarded toys, acting like ababy
- Depression and withdrawal

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour. Young people who are being sexually exploited may:

- be involved in abusive relationships
- intimidated and fearful of certain people or situations
- hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- associate with other young people involved in sexual exploitation
- get involved in gangs, gang fights, gang membership
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- not know where they are, because they have been moved around the country
- go missing from home, care or education
- They may also show signs of sexual abuse or grooming.

Other signs

Patterns of absence and prolonged absence may be indicators of safeguarding issues including sexual abuse and exploitation.

NEGLECT

Severe neglect is often characterised by the child being underweight, small in stature and with a poor physique. The care of neglected children is often poor and they present as unwashed, unkempt and inadequately fed and clothed (e.g. thin cotton dresses and plastic sandals in snow). However, poverty, deprivation and neglect are not the same thing. Children may live in poverty but

Physical indicators

- Constant hunger
- Poor personal hygiene

- Constant tiredness
- Inadequate clothing
- Untreated medical problems

Behavioural indicators

- Social isolation – does not join in and has few friends
- Low self-esteem
- Frequent lateness or non-attendance at school
- Destructive tendencies
- Poor relationships with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking

Reacting to the signs

Every child is different and may respond differently to abuse, neglect or exploitation (in whatever form). Staff should remain alert to any significant change in a child's presentation, behaviour or circumstances, as well as the absence of expected patterns or the emergence of behaviours that are unusual for that individual. This may include changes in attendance, engagement with learning, behaviour, appearance, friendships, emotional wellbeing, physical health, or the unexplained acquisition of money, clothing or electronic devices. Whilst any single indicator may seem minor in isolation, it could represent an early sign of abuse, neglect or exploitation. Staff should therefore exercise professional curiosity, share concerns promptly, and recognise that timely action may prevent harmful behaviours or situations from becoming normalised or escalating further.