



Safeguarding (Child Protection) Policy and Procedures

Contents

1. Key Personnel and Contact Details	6
2. Key External Agencies, Services and Professionals' Contact Details.....	7
3. Introduction and Regulatory Framework	8
4. Equality Act 2010	8
5. Concerns About a Child	8
6. Definitions of Child Protection and Safeguarding	9
7. Procedures for Dealing with Concerns About a Child	9
i. What Staff Should Do if They Have Concerns About a Child.....	9
ii. What Staff Should Do if a Child Is in Immediate Danger or at Risk of Harm	9
iii. Information Sharing.....	9
iv. Receiving a Disclosure	10
v. Wishes of the Child.....	10
vi. Contextual Safeguarding	10
vii. Early Help.....	10
viii. Referral to External Agencies.....	11
ix. Record Keeping	11
x. Prejudice-based harm.	11
8. Responding to Specific Safeguarding Issues	11
i. Radicalisation and Prevent	11
ii. Female Genital Mutilation (FGM).....	11
iii. Serious Violence	12
iv. Sharing of Nude or Semi-Nude Images and Videos, Including Those Generated Using AI	12
v. Children Absent from Education	12
vi. Mental Health Support	12
vii. Children Who Have a Social Worker.....	13
viii. Homelessness and Temporary Accommodation	13
9. Arrangements for Dealing with Child-on-Child Abuse, Including Child-on-Child Sexual Violence and Harassment	13
i. Procedure Where Reports of Child-on-Child Abuse Are Made.....	14

Date of Review	September 2026	Date Ratified by Chair of Governors	September 2026
Date of Next Review	September 2027	Reason for Review	Annual Review

10. Dealing with Safeguarding Concerns or Allegations Made About Staff, Volunteers and Contractors	14
i. Safeguarding Concerns About Organisations or Individuals Using School Premises	15
ii. Concerns About Safeguarding Practices in the School.....	15
11. Dealing with Concerns that Do Not Meet the Harm Threshold: Low-Level Concerns.....	15
12. Restrictive Physical Intervention	16
13. Safer Recruitment	16
14. Management of Safeguarding	16
15. Safeguarding and Child Protection Training	17
16. Oversight of Safeguarding, Including Arrangements for Reviewing Policies and Procedures	18
17. The School's Arrangements to Fulfil Other Safeguarding Responsibilities.....	18
i. Teaching Pupils How to Keep Safe	18
ii. Filtering and Monitoring.....	18
iii. Use of Artificial Intelligence (AI)	19
iv. Use of Mobile Phones and Smart Devices.....	19
v. Cyber Security.....	19
vi. Relationships Education and Relationships and Sex Education (RSE)	20
vii. Sport	20
viii. Looked After Children	20
ix. Private Fostering.....	20
x. Arrangements for Visiting Speakers	20
xi. Use of School Premises for Non-School Activities.....	20
xii. Operation Encompass.....	20
xiii. Photography and Images	21
xiv. Gender Questioning Children	21
18. Early Years Provision Safeguarding Arrangements.....	22
Appendix 1 - The Designated Safeguarding Lead (DSL) and Deputy DSLs (DDSLs).....	24
Training.....	24
Managing Referrals.....	24
Working with Others	24
Raising Awareness	25
Information Sharing and Managing Child Protection Records.....	25
Prevent	25
Appendix 2 - Types and Signs of Abuse	26
Physical Abuse	26
Emotional Abuse.....	26
Sexual Abuse.....	26
Sexual Harassment	26
Harmful Sexual Behaviour	27

Sharing of Nude or Semi-Nude Images, Videos or Live Streams, Including Those Generated Using AI .	27
Upskirting	27
Neglect.....	27
Child Sexual and Criminal Exploitation.....	27
County Lines	28
Modern Slavery	28
Cybercrime	28
Serious Violence	28
So-Called Honour-Based Abuse.....	28
Radicalisation.....	29
Domestic Abuse.....	29
SEND and Certain Health Conditions.....	29
Lesbian, Gay, Bisexual or Trans (LGBT) Pupils and Gender-Questioning Children.....	29
Children Who Are Absent from Education	29
Child Abduction and Community Safety.....	29
Children with a Family Member in Prison	30
Racism and Discrimination	30
Appendix 3 - Arrangements for Dealing with Child-on-Child Allegations, Including Child-on-Child Sexual Violence and Harassment	31
Children with Special Educational Needs and Disabilities (SEND).....	31
Steps to Minimise the Risk of Child-on-Child Abuse	31
Procedure to Be Followed in the Event of Child-on-Child Abuse	31
Pupil Suspension.....	32
Police Referrals.....	32
Sharing of Nude or Semi-Nude Images and Videos.....	32
Appendix 4 - The Prevent Duty: Preventing Radicalisation and Extremism	33
The Channel Programme	33
Indicators of Vulnerability	33
Access to Extremism.....	33
Experiences, Behaviours and Influences	33
Social Factors.....	34
Appendix 5 - Guidance for Staff, Governors and Volunteers on Suspecting or Hearing a Complaint of Abuse	35
Action Staff, Governors and Volunteers Must Take	35

Appendix 6 - Dealing with Allegations or Concerns About Members of Staff, the Headmaster, Governors or Volunteers	36
Procedures Following an Allegation or Concern About a Member of Staff, The Headmaster or Head of Pre-Prep & Prep, a Governor or a Volunteer's Behaviour Towards a Pupil	36
Duty of Care.....	36
Ceasing to Use Staff.....	36
Unsubstantiated, False or Malicious Allegations	36
Low Level Concerns	37
Appendix 7 - Visiting Speakers.....	38
Appendix 8 - Related School Policies.....	39
Appendix 9 - Log of a Concern About a Pupil's Safety and Welfare.....	40
Appendix 10 - Low-Level Concerns Policy.....	41
Appendix 11 - Safeguarding Summary Sheet: Weekends and Out-of-Hours.....	46
If a Pupil Wants to Speak to a Member of Staff	46
What to Look Out For	46
If You Are Concerned About the Behaviour of an Adult	46
What to Do if You Suspect a Pupil Is at Risk of Harm	46
Appendix 12 - Safeguarding Reporting Summary for Staff (Hampton School)	47
Appendix 13 - Safeguarding Reporting Summary for Staff (Hampton Pre-Prep & Prep).....	48

This policy applies to the Hampton School Trust ('the Trust'), comprising Hampton School and Hampton Pre-Prep & Prep School (HPP&P), together referred to as 'the School', and covers all pupils from the Early Years Foundation Stage (EYFS) to the Upper Sixth Form.

This policy is published on the websites of Hampton School and Hampton Pre-Prep & Prep School and is available to parents from the Bursary or the School Office at the respective schools upon request. A copy can be made available in large print or another accessible format if needed.

1. Key Personnel and Contact Details for Safeguarding at the School

Safeguarding issues can be emailed to the DSL or DDSLs at safeguarding@hamptonschool.org.uk or safeguarding@hamptonprep.org.uk

Safeguarding Role	Name	Position at the School	Contact
Hampton School			
Designated Safeguarding Lead (DSL)	Owen Morris (JOM)	Deputy Head	o.morris@hamptonschool.org.uk, extension 4400
Deputy DSL (DDSL)	Pippa Message (PZM)	Deputy Head	p.message@hamptonschool.org.uk, extension 4005
Deputy DSL (DDSL)	Mark Nicholson (MAN)	Deputy Head	m.nicholson@hamptonschool.org.uk, extension 4227
Deputy DSL (DDSL), with responsibility for Looked After Children	Polly Holmes (PAH)	Assistant Head (Pastoral)	p.holmes@hamptonschool.org.uk, extension 1006
Deputy DSL (DDSL)	Victoria Smith (VMS)	Head of Year	v.smith@hamptonschool.org.uk, extension 1007
The Headmaster	Kevin Knibbs (KK)	The Headmaster	headmaster@hamptonschool.org.uk
Hampton Pre-Prep & Prep School			
Designated Safeguarding Lead (DSL)	Tammy Howard (TH)	Deputy Head (Pastoral)	t.howard@hamptonprep.org.uk, extension 4461
Deputy DSL (DDSL), with responsibility for the EYFS	Imogen Murphy (IM)	Head of Pre-Prep	i.murphy@hamptonprep.org.uk, extension 4480
Head of Hampton Pre-Prep & Prep	Phillip Barr (PB)	Head of Hampton Pre-Prep & Prep	p.barr@hamptonprep.org.uk, extension 4461
Governors			
Chair of Governors and Nominated Lead Safeguarding Governor	Andrew Munday	Governor	ahm@hamptonschool.org.uk
Nominated Safeguarding Governor, Hampton School	Alice Yandle	Governor	avy@hamptonschool.org.uk
Nominated Safeguarding Governor, HPP&P	Mat Chataway	Governor	mcc@hamptonschool.org.uk

School Counsellors			
School Counsellor	Michael Uccelli	Counsellor	m.uccelli@hamptonschool.org.uk, extension 4032/4030
School Counsellor	Simeron Kaler	Counsellor	s.kaler@hamptonschool.org.uk, extension 4032/4030
School Counsellor	Vicci Nagli	Counsellor	v.nagli@hamptonschool.org.uk, extension 4032/4030

2. Key External Agencies, Services and Professionals' Contact Details

Agency	Address	Contact
Single Point of Access, Richmond and Kingston (Achieving for Children)		020 8547 5008 (8am to 6pm, Monday to Friday) or 020 8770 5000 out of hours. spa@richmond.gov.uk
Local Authority Designated Officer (LADO) Service	Guildhall, 2 High Street, Kingston upon Thames, KT1 1EU	020 8891 7370 / 07774 332675 / 07936 601423. LADO@achievingforchildren.org.uk
Police Child Abuse Investigation Team (CAIT)	Feltham Police Station, 34 Hanworth Road, Feltham, TW13 5BZ	020 8247 6331
Kingston and Richmond Safeguarding Children Partnership (KRSCP)	44 York Street, Twickenham, TW1 3BZ	07834 386459. Klsch-support@kingrichlsch.org.uk
Initial Response, Children's Social Care, Surrey		0300 470 9100 (out of hours 01483 517898)
Hounslow Children's Social Care		020 8583 6600
Ealing Children's Social Care		020 8825 8000
Hammersmith and Fulham Children's Social Care		020 8753 6600
Merton Children's Social Care		020 8545 4226 (out of hours 020 8770 5000)
Wandsworth Children's Social Care		020 8871 6622 (out of hours 020 8871 6000)
NSPCC Whistleblowing Advice Line		0800 028 0285. help@nspcc.org.uk
Childline		0800 1111
Police (non-emergency)		101; emergency 999
Prevent, Department for Education		020 7340 7264. counter.extremism@education.gov.uk
Anti-Terrorist Hotline		0800 789 321
Forced Marriage Unit		020 7008 0151. fmu@fco.gov.uk
Teaching Regulation Agency (TRA)		020 7593 5393. Misconduct.Teacher@education.gov.uk

Agency	Address	Contact
Disclosure and Barring Service (DBS)		03000 200 190. customerservices@dbb.gov.uk
Operation Encompass Helpline		0204 513 9990 (8am to 1pm, Monday to Friday)

3. Introduction and Regulatory Framework

This policy applies to all schools within the Hampton School Trust, including the EYFS setting at Hampton Pre-Prep & Prep School. It is reviewed at least annually, or sooner if there is a change in relevant legislation or guidance and is available on the School website or in printed form on request from the Bursary.

This policy has regard to the following legislation, statutory guidance and advice:

- Keeping Children Safe in Education (September 2026) ("KCSIE"), which incorporates the statutory guidance Disqualification under the Childcare Act 2006
- Working Together to Safeguard Children (March 2026)
- Prevent Duty Guidance: Guidance for Specified Authorities in England and Wales (December 2023)
- RSE guidance (published July 2025 for September 2026 implementation)
- Behaviour in Schools (February 2024)
- Working Together to Improve School Attendance: Statutory Guidance for Maintained Schools, Academies, Independent Schools and Local Authorities (July 2026)
- Children Missing Education (September 2025)
- Digital and Technology Standards in Schools and Colleges (April 2026)
- After School Clubs, Community Activities, and Tuition: Safeguarding Guidance for Providers (February 2026)
- Section 3 of the Early Years Foundation Stage Statutory Framework for Group and School-Based Providers (September 2026))
- The Charity Commission's guidance, Safeguarding and Protecting People for Charities and Trustees (June 2022)
- Restrictive Interventions, Including Use of Reasonable Force, in Schools (April 2026)

This policy also takes into account the procedures and practice of the Kingston and Richmond Safeguarding Children Partnership (KRSCP) as part of the multi-agency safeguarding arrangements covering the School's catchment area.

4. Equality Act 2010

The School recognises its obligations under the Equality Act 2010 and will not discriminate against pupils because of a protected characteristic, including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity or sexual orientation. In a safeguarding context, the School considers how to support pupils with regard to their particular protected characteristics and makes reasonable adjustments for disabled pupils where needed.

The School is alert to the risk of adultification bias, where some children may be perceived as older than they are, leading to their needs being misunderstood and opportunities to help being missed. The School also puts special provision in place to support dialogue with pupils who may find it harder to convey their wishes and feelings, including those with communication difficulties or for whom English is not their first language.

5. Concerns About a Child

The School has a duty to consider, at all times, the best interests of the pupil and to take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility, and the School adopts a whole-school approach in which safeguarding underpins all aspects of process and policy development.

Staff are required to report any concerns about the safety or welfare of a pupil, about the conduct of an adult working in the School, or about safeguarding practices within the School, in accordance with this policy.

Parents are encouraged to raise any safeguarding concerns directly with the School using this policy. Parents may also raise concerns directly with the Department for Education if they wish.

6. Definitions of Child Protection and Safeguarding

Safeguarding and promoting the welfare of children is defined as: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that occurs within or outside the home, including online; preventing the impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and promoting the welfare of children and is defined as the activity undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online, and in kinship care, foster care or residential care.

Detailed definitions and indicators of physical abuse, emotional abuse, sexual abuse, sexual harassment and violence, harmful sexual behaviour, neglect, and other specific safeguarding issues (including child sexual and criminal exploitation, county lines, modern slavery, radicalisation, and honour-based abuse) are set out in Appendix 2 of this policy.

7. Procedures for Dealing with Concerns About a Child

i. What Staff Should Do if They Have Concerns About a Child

Any member of staff who has a concern about a pupil's safety or welfare should report it to the DSL, or in their absence to a DDSL, as soon as possible on the day the concern arises, and in any event before the end of that School day.

Staff should not investigate concerns themselves, promise confidentiality to a pupil, or delay in passing on information because they are uncertain whether it meets a particular threshold. If in doubt, staff should always speak to the DSL or a DDSL.

ii. What Staff Should Do if a Child Is in Immediate Danger or at Risk of Harm

If a member of staff believes a pupil is in immediate danger, they should contact the police on 999 without delay. Where there is a risk to life or an emergency situation, staff should not wait to speak to the DSL before calling the emergency services but should inform the DSL as soon as possible afterwards.

iii. Information Sharing

Staff should share information proportionately, ensuring that it is shared with the right people at the right time. Fears about sharing information should not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of a pupil. Staff should be mindful that seeking consent from a parent to share information could, in some cases, increase the risk of harm to a child, and should discuss any such concerns with the DSL before approaching a parent.

iv. Receiving a Disclosure

If a pupil discloses that they are being abused, neglected, or exploited, staff should:

- listen carefully and calmly, without displaying shock or disbelief, and without interrupting the pupil unnecessarily
- reassure the pupil that they were right to tell someone
- not promise confidentiality, and explain that the information will need to be passed to the DSL so the right action can be taken
- avoid asking leading questions; if clarification is needed, use open, non-suggestive questions only
- record what was said as soon as possible afterwards, using the pupil's own words where possible, and pass this to the DSL without delay

Where a disclosure relates to harmful sexual behaviour, it should, where possible, be managed with two members of staff present, preferably including the DSL or a DDSL.

v. Wishes of the Child

The School takes a child-centred approach to safeguarding. In responding to safeguarding concerns, the School will take account of the pupil's wishes and feelings, having regard to their age, understanding, maturity and individual circumstances. The pupil will be listened to and supported throughout the safeguarding process, while recognising that safeguarding responsibilities may require information to be shared without the pupil's or family's agreement.

vi. Contextual Safeguarding

Safeguarding incidents and behaviours can be associated with factors outside the School and may occur between pupils away from School premises, including online. The DSL and DDSLs will consider the wider context in which any concern arises and will share relevant information with children's social care as part of any referral to enable full consideration of the circumstances.

vii. Early Help

Early help means support provided as soon as a problem emerges, at any stage in a child's life. Any pupil may benefit from early help, but staff should be particularly alert to the potential need for early help where a pupil, for example: has SEND or a health condition with additional needs; has a mental health need; is a young carer; is showing signs of being drawn into anti-social or criminal behaviour; is frequently absent or goes missing from education; has experienced multiple suspensions or is at risk of exclusion; misuses drugs or alcohol; is at risk of modern slavery, trafficking, or exploitation; is affected by domestic abuse or parental substance misuse or mental illness in the family; is at risk of radicalisation; has a parent in custody; has shown signs of abusive, violent or harmful behaviour towards others; is a parent themselves or is at risk of honour-based abuse, including FGM or forced marriage.

Where a member of staff identifies that a pupil may benefit from early help, they should discuss this with the DSL, who will consider whether to coordinate a School-based response or make a referral for a multi-agency assessment through the local authority. Any early help provided will be kept under review, with escalation to a referral for a child protection assessment if the pupil's situation does not improve.

Where a pupil's needs cannot be adequately addressed through universal or community-based Early Help, the School will consider whether the pupil and family require more targeted support through Family Help. This may be appropriate where a pupil has multiple or complex needs, or where circumstances make them particularly vulnerable. The DSL will work with the pupil, parents/carers and relevant agencies to determine the most appropriate support.

viii. Referral to External Agencies

Not every concern about a pupil's welfare will meet the threshold for referral to an external agency. Where the DSL (or in their absence, one of the DDSLs) determines that a concern can be safely managed within the School, appropriate pastoral support will be put in place, for example through the pupil's Form Tutor, Head of Year, or the School's Counsellors. The DSL will keep such cases under review and will escalate to children's social care or another external agency if the pupil's situation does not improve or new concerns arise.

ix. Record Keeping

All concerns, discussions and decisions, including the reasoning behind them, must be recorded in writing on CPOMS as soon as possible. This applies whether or not a referral is made to an external agency. Records should be factual, should distinguish between observed fact, professional opinion and information reported by others, and should include a summary of the concern, the action taken, the decision reached, and the outcome.

Safeguarding records are kept confidential and stored securely, accessible only to those who need to see them, and are shared in accordance with Parts one and two of KCSIE. Where a pupil transfers to another school, including mid-year, the DSL will ensure the child protection file is transferred securely, separately from the main pupil file, within five School days, with confirmation of receipt obtained.

In addition to transferring the child protection file, the DSL should consider whether there should be a direct conversation with the DSL of the receiving school to enable appropriate support and safeguarding arrangements to be put in place. This may include information relating to pupils who have had a social worker, have experienced abuse, are receiving support through the Channel programme, or where there are relevant concerns relating to serious violence, exploitation or harmful sexual behaviour. Information should be shared proportionately and in accordance with applicable information-sharing and data protection requirements.

x. Prejudice-based harm

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. These should be treated as safeguarding concerns and reported in accordance with this policy.

8. Responding to Specific Safeguarding Issues

i. Radicalisation and Prevent

All staff should be aware of the indicators that may signal a pupil is at risk of radicalisation or being drawn into terrorism and should report any concerns to the DSL. Depending on the level of risk, this may lead to a referral to the Channel programme or to children's social care. If staff believe there is an immediate risk of a pupil being drawn into terrorism, they should call 999. Further guidance is set out at Appendix 4 of this policy (The Prevent Duty).

The School carries out an annual Prevent risk assessment, in consultation with local partners including the police.

ii. Female Genital Mutilation (FGM)

Hampton School is a school for boys, however there are girls at Hampton Pre-Prep and there are a range of activities where girls from other schools may be involved with Hampton School activities. Staff must report to the police any case where they discover that an act of FGM appears to have been carried out on a girl under 18. Staff should also report such cases to the DSL, who will involve children's social care as appropriate. Where staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL, who will activate local safeguarding procedures using

existing national and local protocols for multi-agency liaison with the police and children's social care.

iii. Serious Violence

Staff should be alert to indicators that a pupil may be at risk from, or involved with, serious violent crime, including increased absence from School, a change in friendships or relationships with older individuals, a decline in performance, signs of self-harm, a significant change in wellbeing, or signs of assault or unexplained injuries. Any such concern should be reported to the DSL as soon as possible.

iv. Sharing of Nude or Semi-Nude Images and Videos, Including Those Generated Using AI

The School is alert to the safeguarding risks arising from artificial intelligence in this context, including the generation of deepfake intimate images and the use of AI to create child sexual abuse material. Taking or sharing an AI-generated intimate image of a person under 18 is a criminal offence, and any incident involving AI-generated imagery will be treated with the same seriousness as one involving a real image.

Any member of staff who is notified of, or becomes aware of, an incident involving the sharing of nude or semi-nude images or videos should refer it to the DSL/DSLs immediately. Every such incident will receive a safeguarding response, whether or not it was consensual, and the DSL will follow the guidance *Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People*. This will typically involve an initial review meeting, interviews with the pupils involved where appropriate, informing parents at an early stage (unless doing so would place a pupil at risk), and a risk assessment to determine whether any pupil has been harmed or is at risk of immediate harm.

An immediate referral to the police and/or children's social care will be made where, for example: an adult is involved; there is reason to believe a pupil has been coerced, blackmailed or groomed, or their capacity to consent is in doubt; the imagery depicts sexual acts unusual for the pupil's developmental stage, or is violent; any pupil in the imagery is under 13; or there is reason to believe a pupil is at immediate risk of harm, for example through suicidal ideation or self-harm.

v. Children Absent from Education

Persistent or prolonged absence from education can be a vital warning sign of a range of safeguarding issues, including neglect and child sexual or criminal exploitation, particularly county lines involvement. The School's procedures for unauthorised absence and for pupils who are absent, repeatedly or for prolonged periods, are set out in the School's **Pupil Attendance Policies** and the Trust-wide **Missing Pupil Policy**. Further information can be found in Appendix 1 of this policy.

Where reasonably possible, the School holds more than one emergency contact number for each pupil. The School will notify the relevant local authority of any pupil who fails to attend regularly, or who has been absent without the School's permission for a continuous period of 10 School days or more.

vi. Mental Health Support

Staff should be aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation, and can themselves develop into a safeguarding concern, for example through self-harm, an eating disorder or suicidal ideation. Any mental health concern that is also a safeguarding concern should be reported to the DSL immediately. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health

problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

Where a pupil is in immediate danger, staff should call 999 or arrange for the pupil to be taken to A&E by a parent, carer or other suitable person. Staff should not wait for a formal diagnosis before raising a concern with the DSL.

vii. Children Who Have a Social Worker

Where the local authority notifies the School that a pupil has a social worker, the DSL will hold and use this information so that decisions about the pupil's safety, welfare and educational outcomes can be made in the pupil's best interests, including decisions about attendance and pastoral or academic support.

viii. Homelessness and Temporary Accommodation

Being homeless, or at risk of homelessness, presents a real risk to a pupil's welfare. Staff who become aware or suspect that a pupil may be at risk of homelessness should speak to the DSL in the first instance. Where the School receives notification that a pupil has been placed in temporary accommodation, the DSL will assess whether the pupil's welfare needs have changed, liaise with the relevant housing and children's social care authorities, and make a referral where there are concerns that the pupil has been harmed or is at risk of harm. This does not replace the School's existing safeguarding duties.

9. Arrangements for Dealing with Child-on-Child Abuse, Including Child-on-Child Sexual Violence and Harassment

Child-on-child abuse is abuse by one or more pupils against another pupil. It is a safeguarding concern for both the victim and the alleged perpetrator, is preventable, and can happen inside or outside School, including online. It can include:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse and harm (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm)
- physical assault and harm, or the threat of harm with a weapon
- initiation/hazing type of violence and rituals

- upskirting
- consensual and non-consensual making or sharing of nude or semi-nude images and/or videos including those generated using AI, e.g. deepfakes
- harmful sexual behaviours, sexual violence and sexual harassment, which may include misogyny/misandry
- 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

All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

Bullying and cyberbullying are addressed through the School's Behaviour and Anti-Bullying arrangements. However, staff must recognise that bullying may also constitute a safeguarding or child protection concern. Where there is reasonable cause to suspect that a pupil is suffering, or is likely to suffer, significant harm, the matter must be referred to the DSL and considered under the School's safeguarding procedures. Particular attention should be given to pupils who may be especially vulnerable to bullying because of SEND, disability, protected characteristics or other perceived differences.

These arrangements apply to all reports of child-on-child abuse, whether they occurred at School, elsewhere, or online, and abuse occurring online or outside School will never be treated as less serious. The School takes a zero-tolerance approach: abusive comments and behaviour will never be dismissed as 'banter' or 'part of growing up', and physical behaviours that are potentially criminal in nature, such as touching another pupil inappropriately, will always be challenged.

The School recognises that pupils with SEND or certain health conditions are at significantly greater risk of abuse by their peers and will consider additional pastoral support for these pupils where appropriate. The School also recognises that a pupil's first disclosure to a trusted adult may relate to a pattern of abuse rather than a single incident, and all reports will be taken seriously regardless of how long it has taken for a pupil to come forward.

i. Procedure Where Reports of Child-on-Child Abuse Are Made

Where an issue of pupil behaviour or bullying gives reasonable cause to suspect that a pupil is suffering, or is likely to suffer, harm, staff must follow the procedures set out in this policy, and not simply the School's Anti-Bullying or Behaviour policies. All reports will be referred to the DSL, who will decide on the appropriate response, which may include a risk and needs assessment for both the victim and the alleged perpetrator, referral to children's social care and/or the police, and/or an internal disciplinary or pastoral response under the School's **Behaviour policies**.

Full details of the School's arrangements for dealing with child-on-child abuse, including steps to minimise risk, the procedure for suspension, police referrals, and considerations for pupils with SEND, are set out at Appendix 3 of this policy.

10. Dealing with Safeguarding Concerns or Allegations Made About Staff, Volunteers and Contractors

The School's **Staff Behaviour Policy** sets out the standards of appropriate behaviour and conduct expected of its staff, and all staff are expected to comply with it at all times.

If a member of staff has a safeguarding concern, or an allegation is made, that a member of staff, supply teacher, trainee teacher, volunteer or contractor has harmed, or poses a risk of harm to, a pupil, this should be reported to The Headmaster (or the Head of Hampton Pre-Prep & Prep), who will consider whether a referral to the LADO is required. Where the concern or allegation relates to The Headmaster (or the Head

of Hampton Pre-Prep & Prep) this should be reported directly to the Chair of Governors or to the LADO should there be a conflict of interest in reporting to the Chair of Governors.

Where a concern or allegation does not meet the harm threshold, it should be shared in accordance with the procedure set out below under 'Dealing with Concerns that Do Not Meet the Harm Threshold: Low-Level Concerns'.

The full procedure for managing an allegation against a member of staff, The Headmaster (or Head of Hampton Pre-Prep & Prep), a Governor or a volunteer, including the role of the case manager, timescales for review, and referral to the DBS or Teaching Regulation Agency, is set out at Appendix 6 of this policy. The same procedures apply to supply teachers and contractors, with the relevant agency kept fully informed throughout.

i. Safeguarding Concerns About Organisations or Individuals Using School Premises

Where an allegation or concern relates to an incident involving an individual or organisation using the School's premises to run activities for pupils, for example community groups, sports clubs, or tuition providers, the School will follow this policy, including informing the LADO where appropriate. Where such activities are not under the direct supervision or management of the School, the School will seek assurance that the provider has appropriate safeguarding policies and procedures in place and will inspect these as needed.

ii. Concerns About Safeguarding Practices in the School

The School aims to foster a culture of safety and openness, in which staff feel able to raise concerns about poor or unsafe practice, including in relation to the School's own safeguarding systems. Such concerns should be raised in accordance with the School's **Whistleblowing Policy**. No disciplinary action will be taken against a member of staff for making such a report in good faith. Staff who feel unable to raise a concern within the School, or who feel a genuine concern has not been addressed, may also contact the NSPCC Whistleblowing Advice Line.

11. Dealing with Concerns that Do Not Meet the Harm Threshold: Low-Level Concerns

A low-level concern is any concern that a member of staff may have behaved in a way that is inconsistent with the **Staff Behaviour Policy**, including outside work, but which does not meet the threshold for referral to the LADO. A concern is no less a low-level concern for being small: it may amount to no more than a sense of unease, and behaviour of this kind can range from the inadvertent or thoughtless through to behaviour that is ultimately intended to enable abuse.

The School takes all such concerns seriously, recognising that addressing them is central to embedding a culture of openness and trust. Full details of the process for sharing and recording low-level concerns are set out in the School's **Low-Level Concerns Policy** at Appendix 10, which enables any member of staff to share a concern, no matter how small, about their own or another member of staff's behaviour.

Staff must share concerns without delay as outlined in the Low-Level Concerns Policy so that the matter can be recorded and addressed sensitively and proportionately. Where a low-level concern relates to either Headmaster, it should be referred to the Chair of Governors. Staff are also encouraged to self-refer where they believe they may have behaved in a way that could be misinterpreted or fall below the expected professional standard.

All low-level concerns are recorded in writing, kept confidential, held securely, and retained in accordance with data protection requirements. Low-level concerns will not be included in references unless they relate to matters that would normally be disclosed, such as misconduct or poor performance. The School reviews reported concerns periodically to identify any patterns that may indicate a wider cultural or systemic issue requiring further training or a change in practice.

12. Restrictive Physical Intervention

Members of staff may use reasonable force to prevent a pupil from harming themselves or others, from committing an offence, or from causing damage to property, in accordance with the School's **Restrictive Intervention (Use of Reasonable Force) Policy**. Any use of force must be recorded and reported to the DSL immediately and parents must be informed that day.

13. Safer Recruitment

The School is committed to safer recruitment practices in order to create a culture that safeguards and promotes the welfare of pupils, while deterring and preventing individuals who are unsuitable to work with children from applying for, or securing, employment or volunteering opportunities at the School.

All members of staff, including part-time, temporary, supply and visiting staff such as musicians and sports coaches, are subject to the necessary statutory child protection checks before starting work. These include right to work checks, identity verification, taking up references, checking work history, confirming medical fitness for the role, and, for most appointments, an enhanced DBS check with barred list information. Staff working in, or with unsupervised access to, the EYFS provision at Hampton Pre-Prep & Prep will not begin work until a satisfactory enhanced DBS check and barred list check has been received.

As part of shortlisting, the School will also consider carrying out an online search of candidates, which may help identify publicly available information that the School may wish to explore at interview. Full details of the School's safer recruitment procedures, including for Governors and volunteers, are set out in the School's **Recruitment and Selection Policy**. Arrangements for ensuring visiting speakers are suitable and appropriately supervised are set out below and at Appendix 7 of this policy.

14. Management of Safeguarding

The Designated Safeguarding Lead (DSL) at each school within the Trust takes lead responsibility for safeguarding and child protection matters. Should the DSL not be available, any safeguarding or child protection issue should be reported to one of the Deputy Designated Safeguarding Leads (DDSLs). A full list of contacts is set out at the start of this policy.

However, if the DSL or a DDSL is unavailable, or if there is any difficulty in following the agreed safeguarding procedure, staff must be prepared to make a referral directly to Children's Social Care and/or the Police as appropriate.

Such a referral should be made immediately and, in any event, within 24 hours of the concern arising. Parental consent is not required for a referral to statutory safeguarding agencies where a safeguarding concern justifies such a referral. The member of staff should inform the DSL as soon as possible that a referral has been made.

The DSL is responsible for maintaining an overview of safeguarding within the School, opening channels of communication with local statutory agencies, referring incidents to third parties as appropriate, supporting staff in carrying out their safeguarding duties, and monitoring the effectiveness of the School's policies and procedures in practice. The DSL's responsibility also includes online safety and understanding the filtering and monitoring systems the School has in place.

During term time, the DSL, or a DDSL, is always available in person during School hours. The email addresses safeguarding@hamptonschool.org.uk and safeguarding@hamptonprep.org.uk are confidential shared mailboxes that go to the DSLs as well as the DDSLs of the respective schools, to ensure safeguarding concerns are picked up promptly. For matters arising outside normal School hours, staff should refer to the out-of-hours contact arrangements set out at Appendix 11 of this policy.

The DSL, or a DDSL, liaises with the KRSCP and works with other agencies, having regard to the National Police Chiefs' Council guidance on when to call the police. The DSL is also responsible for liaising with the School's Counsellors where a safeguarding matter is linked to mental health and should be confident as to the local specialist support available to pupils involved in sexual violence or sexual harassment.

While the Headmaster and the Head of Hampton Pre-Prep & Prep are responsible for ensuring that policies and procedures are adopted, understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL, and this responsibility must not be delegated.

15. Safeguarding and Child Protection Training

All staff and Governors, including the Headmaster and the Head of Hampton Pre-Prep & Prep, receive a copy of this policy and Part One of KCSIE and are required to confirm that they have read and understood and will comply with its provisions. Staff and Governors are kept informed of any changes to Part One of KCSIE between scheduled policy reviews, including through regular briefings, training sessions and INSET days.

All new staff receive safeguarding and child protection training as part of their induction. This includes familiarisation with this policy; the identity and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs); and the role and identity of the nominated Lead Safeguarding Governor.

All new staff are also required to read and acknowledge electronically the following policies:

1. Hampton School Behaviour, Rewards, Sanctions, Discipline and Exclusions Policy*
2. Hampton School Code of Conduct
3. Hampton School Health and Safety Policy
4. Hampton School Pupil Attendance Policy*
5. Hampton School Trust Artificial Intelligence Acceptable Use Policy
6. Hampton School Trust Equality, Diversity and Inclusion Policy
7. Hampton School Trust Low Level Concerns Policy
8. Hampton School Trust Missing Pupils Policy
9. Hampton School Trust Mobile Phone & Smart Devices Policy
10. Hampton School Trust Online Safety Policy
11. Hampton School Trust Privacy Notice
12. Hampton School Trust Restrictive Intervention - Use of Reasonable Force Policy
13. Hampton School Trust Safeguarding (Child Protection) Policy
14. Hampton School Trust Social Media Policy
15. Hampton School Trust Staff Behaviour Policy
16. Hampton School Trust Staff Harassment and Bullying Policy
17. Hampton School Trust Staff IT Acceptable Use Policy
18. Hampton School Trust Whistleblowing Policy
19. Keeping Children Safe in Education – Part 1 (Sept 2026)

*indicates that Hampton Pre-Prep & Prep has its own version of this policy

In addition, new staff joining HPP&P are required to confirm that they have read and understood the following early years specific policies:

1. Anti-Bullying
2. Care & Supervision
3. Emergency Procedures
4. Fire Risk & Safety
5. First Aid
6. Health & Safety
7. Intimate Care
8. Teaching Staff Induction; and

9. The Staff Handbook

Staff are updated on any changes to Part one of KCSIE before the next scheduled policy review, including through regular briefings on INSET days.

All staff and volunteers undertake safeguarding and child protection training in accordance with KRSCP guidance, at least annually, with termly updates. Training is delivered through a combination of face-to-face sessions led by the DSL and DDSs, online questionnaires, presentations by outside speakers, and the annual completion of Educare safeguarding courses.

The DSL receives updated child protection training at least every two years, covering local inter-agency working, participation in child protection case conferences, the Prevent Duty, and working with Channel panels.

All Governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated.

16. Oversight of Safeguarding, Including Arrangements for Reviewing Policies and Procedures

The Chair of Governors, Andrew Munday, takes the lead in relation to responsibility for safeguarding arrangements throughout the Trust, working closely with the Nominated Safeguarding Governors for each school. The Safeguarding Governors liaise regularly with the DSLs to maintain oversight of safeguarding activity, review and challenge the effectiveness of the School's policies and procedures, ensure that this policy is reviewed at least annually, and report to the full Governing Body on safeguarding matters at least termly.

This policy is reviewed at least annually, or sooner where necessary, with the review including an evaluation of the effectiveness of the policy's procedures and their implementation. The policy is published on the websites of both Hampton School and HPP&P.

17. The School's Arrangements to Fulfil Other Safeguarding Responsibilities

i. Teaching Pupils How to Keep Safe

- a. All pupils are taught about safeguarding, including online safety, through the curriculum and PSHE (and Life Skills), in order to help them adjust their behaviour and build resilience, including to radicalisation and extremism. This includes teaching pupils about the safe use of the internet and the risks posed by those who use it to bully, groom, abuse or radicalise others. The School recognises that a more personalised approach may be needed for more vulnerable pupils, including some pupils with SEND.

ii. Filtering and Monitoring

- a. The School has appropriate filters and monitoring systems in place to safeguard pupils from harmful and inappropriate material online when using the School's IT systems. These systems reduce the risk of pupils being exposed to illegal, inappropriate or harmful content, being subject to harmful contact from other users, being exposed to online commercial risks such as gambling or phishing and engaging in harmful online conduct such as sharing explicit images or online bullying.

- b. The School reviews the effectiveness of its filtering and monitoring provision at least annually, with reviews carried out by the member of the Senior Leadership Team responsible for this area, supported by the DSL and IT support. This includes checking that filtering is working appropriately on all internet-connected devices in all relevant locations, with a record kept of these checks. Further detail is set out in the School's **Online Safety Policy**.

iii. Use of Artificial Intelligence (AI)

- a. The School recognises that AI, including generative AI, presents both opportunities and safeguarding risks. The School's approach to AI safeguarding is embedded within this policy, including in relation to filtering and monitoring, online safety and training. The School will only use AI products that meet the DfE's Generative AI: Product Safety Expectations, and any use of AI by staff or pupils is carefully assessed for its benefits and risks.
- b. The School is alert to safeguarding risks arising from AI, including the generation of deepfake or AI-generated intimate imagery, the potential for AI chatbots to produce harmful or age-inappropriate content, the risk of pupils over-relying on AI at the expense of their own critical thinking, and the use of AI to facilitate grooming or exploitation. Any safeguarding or wellbeing concern arising from the use of AI tools should be reported to the DSL immediately. Further detail is set out in the School's **AI Acceptable Use Policy**.

iv. Use of Mobile Phones and Smart Devices

The School operates as a mobile phone-free environment by default, in accordance with the DfE's statutory guidance on mobile phones in schools. Pupils do not have access to their mobile phones during lessons, between lessons, or at breaktime and lunchtime, save where a clearly defined exception has been agreed by The Headmaster.

Wearable Smart Devices

- **Wearable smart devices** include but are not limited to smart glasses, wireless AI-integrated earbuds and any other wearable devices which are capable of recording audio or video, accessing or transmitting data, displaying information, or communicating with other devices.
- With the exception of smart watches (the use of which is permitted within the parameters set out in section 4 of the Mobile Phones and Smart Devices policy), wearable smart devices are not permitted on the School site or on School trips.
- Exceptions may be granted on a case-by-case basis where the use of a wearable smart device represents a reasonable adjustment in relation to a disability. Such use will be monitored.
- The restriction on wearable smart devices applies to pupils, staff, parents and visitors. Such devices are prohibited due to safeguarding, privacy and data protection considerations.

The School is also alert to safeguarding, privacy and data protection issues arising from electronic tracking or location-monitoring devices, including devices attached to or carried by pupils. Any concern about the use or misuse of such a device should be reported to the DSL.

v. Cyber Security

The School recognises that cyber security is a safeguarding matter: a cyber-attack that compromises pupils' sensitive personal data can put their safety and wellbeing at risk. The School's arrangements, in line with the DfE's Cyber security standards for schools and colleges and wider Digital and Technology Standards, include maintaining an information asset register, keeping registers relating to hardware and systems up to date, and including digital technology within its disaster recovery and business continuity plans.

vi. Relationships Education and Relationships and Sex Education (RSE)

The School's Relationships Education and RSE curriculum forms part of a whole-school approach to wellbeing, preparing pupils for life in modern Britain and building a culture of zero tolerance for sexism, misogyny, homophobia and sexual harassment or violence. The curriculum also addresses online harms such as the sharing of images and deepfakes. The School recognises that discussions of sensitive topics in RSE can lead to an increase in safeguarding reports, and all staff know what to do if they have such a concern. Further detail is set out in the School's **Relationships and Sex Education Policy**, which the School develops in consultation with parents.

vii. Sport

The School recognises that sport and physical activity can present particular safeguarding risks, including in relation to physical contact, changing facilities, one-to-one coaching and away fixtures. Staff involved in delivering sport are alert to these risks, and where external coaches or providers are engaged, the School satisfies itself that appropriate safeguarding checks and policies are in place.

viii. Looked After Children

The Governing Body ensures that staff have the skills, knowledge and understanding necessary to keep safe any pupils on roll who are looked after by a local authority. Polly Holmes, Deputy DSL, is the designated member of staff with responsibility for the welfare and progress of looked after children and receives appropriate training to carry out this role.

ix. Private Fostering

A private fostering arrangement is where a child under 16, or under 18 if disabled, is cared for by someone who is not a parent or close relative for 28 days or more, with the agreement of the child's parents.

Staff should be alert to the possibility that a pupil may be privately fostered and to any associated safeguarding concerns, including the possibility of trafficking or exploitation. Where a member of staff becomes aware that a pupil may be subject to a private fostering arrangement, they must inform the DSL. The DSL will notify Children's Social Care as appropriate.

x. Arrangements for Visiting Speakers

The School has clear protocols to ensure that visiting speakers, whether invited by staff or pupils, are suitable and appropriately supervised, so that pupils can critically assess the information they receive and so that sessions align with the ethos and values of the School and with British values. The School carries out a risk assessment before any visiting speaker attends, which may include a DBS check where relevant, and visiting speakers are supervised by a member of School staff at all times while on the premises. Further detail, including the Visiting Speaker Form, which can be found on SharePoint, [Visiting Speaker Form - January 2026.pdf](#) - is set out at Appendix 7 of this policy.

xi. Use of School Premises for Non-School Activities

Where services or activities on the School premises are provided under the direct supervision of School staff, this policy applies to any safeguarding concerns that arise. Where they are not, the School seeks assurance that the provider has appropriate safeguarding policies and procedures in place and ensures that the DSL or a DDSL can be contacted at all times the premises are in use. Safeguarding requirements are built into any lease or hire agreement for use of the premises, and failure to comply may lead to termination of that agreement.

xii. Operation Encompass

The School participates in Operation Encompass, the statutory information-sharing scheme under Section 49A of the Domestic Abuse Act 2021, under which the police notify the School's Key Adult

(the DSL) if they have reasonable grounds to believe a pupil may be a victim of domestic abuse. This applies to all pupils connected to a household attended by police in a domestic abuse incident, including those not present at the time. Notifications are stored in line with all other confidential safeguarding information. Parents are made aware that the School is an Operation Encompass setting, and the Safeguarding Governor reports on anonymised Operation Encompass activity to Governors each term.

xiii. Photography and Images

Staff and parents should refer to the detailed information regarding the Trust's use of images set out in the **Policy on Taking, Storing and Using Images of Pupils**; this is appended to the Trust's Privacy Notice which can be found on the School's websites.

As set out in its Terms and Conditions, the Trust includes pupil images in online and print marketing material and communications. Such material will not include reference to pupils' full names without parental consent. Guidelines for staff taking images for these purposes are set out in the **Staff Behaviour Policy**.

- Parents who do not want their child's name or image to appear in online and print marketing material and communications must ensure their child knows this and must contact the School via bursary@hamptonschool.org.uk, requesting an acknowledgement of their request.
- Staff at Hampton Pre-Prep & Prep must only use the Schools' cameras and devices; they must not take images of pupils using their personal photographic equipment (including cameras, iPads or mobile phones) unless prior permission has been given by the Head of Hampton Pre-Prep & Prep
- Parents or close family members may take images of their own children taking part in School events or activities as long as they follow the guidelines set out in the Policy on Taking, Storing and Using Images of Pupils (appended to the Trust's Privacy Notice). Such images are for personal use only and must be taken with consideration and courtesy. Parents should not take images of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents. To respect the privacy of others, and in some cases for child protection purposes, any images taken should not be made accessible to others via the internet (for example on social media) or published in any other way.

xiv. Gender Questioning Children

- This section applies where a child or their parent has requested that the School make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition"). The KCSIE guidance states what our responsibilities are in this area and what we should consider when making decisions about a request, particularly in relation to single-sex sport and spaces and residential accommodation. We will keep a clear record of our decision-making.
- The School will balance the impact of agreeing to the child's request against the impact of refusing their request, taking into account all the relevant factors. We will use our judgment about whether supporting social transition is in the child's best interests and the best interests of other children. We will do this by working together with the child and the child's parents (unless the latter is unsafe to do so), considering clinical evidence or advice and involving the DSL.

- The DSL will also be involved in cases where a child has socially transitioned but staff and school friends are unaware. We will offer in-school support and signpost to community-based organisations where appropriate or requested.

18. Early Years Provision Safeguarding Arrangements

Hampton Pre-Prep & Prep School's Early Years Foundation Stage provision adheres to the requirements of the *EYFS Statutory Framework (September 2026)*, including in relation to safer sleeping arrangements, paediatric first aid, safer eating, and children's privacy during toileting and nappy changing.

- The lead member of staff responsible for safeguarding pupils in the early years setting (pupils under the age of eight) is Head of Pre-Prep (Imogen Murphy) who is also the DDSL for HPP&P.
- EYFS Section 3 of the statutory framework should be read in conjunction with KCSIE.
- All staff appointments in the EYFS are subject to the School's Safer Recruiting protocols and checks will be made on all applicants as to whether, under the Childcare Act 2006, there is any reason for disqualification.
- In accordance with the Statutory Framework for the Early Years Foundation Stage (EYFS) the Trust has additional responsibilities in the event of an allegation of harm involving pupils in the EYFS (Kindergarten and Reception). This must happen whether the allegation of harm or abuse is alleged to have been committed on the premises, or elsewhere, for example, on a trip. In such cases, standard child protection procedures will be followed, and the School will also notify Ofsted (via the ISI office) as soon as is reasonably practicable, but in any event within 14 days of the allegation.
- Termly supervision meetings are held between the Head of Pre-Prep and EYFS staff, in line with the requirements of the Statutory Framework
- As outlined in Hampton Pre-Prep & Prep's Terms and Conditions, parents give consent for appropriate physical contact with their child. Such contact must be consistent with good practice and may be necessary for teaching and instruction, comforting a distressed pupil, or ensuring the pupil's health, welfare, safety, or the maintenance of good order. For further details, please refer to the **Restrictive Physical Intervention Policy**.
- The use of mobile phones, cameras or any other electronic device with imaging and sharing capabilities is strictly forbidden in the EYFS area when children are present. All mobile phones must be stored securely out of reach within the setting during contact time with the children (this includes staff, governors, visitors, parents and volunteers). Staff may use mobile phones only in emergency situations.
- Personal calls may be made during non-contact time, either in classrooms that are empty of children or in the staff room.
- Personal mobile phones, cameras, or video recorders must never be used to record classroom activities unless explicit permission has been granted by the Head of Hampton Pre-Prep & Prep. Only School equipment should be used for this purpose.
- During School events, parents may take photographs or video footage of their own child, but are reminded that such images are for personal use only and should not be made accessible to others via the internet (for example, on Facebook, Instagram or other social media channels), or published in any other way
- Most School productions are recorded by the School and made available to parents.

- Staff must comply with the **Staff Behaviour Policy**, the **Staff IT Acceptable Use Policy** and the **Mobile Phones & Smart Devices Policy**.

Appendix 1 - The Designated Safeguarding Lead (DSL) and Deputy DSLs (DDSLs)

In accordance with Annex B of KCSIE (September 2026), the main responsibilities of the DSL are set out below. These activities can be delegated to the Deputy DSLs (DDSLs), although ultimate responsibility remains with the DSL. Within the Trust there are separate DSLs for Hampton School and HPP&P. During term time, the DSL, or a DDSL, is always available in person during School hours.

Safeguarding issues can be emailed to the DSL or DDSLs at safeguarding@hamptonschool.org.uk or safeguarding@hamptonprep.org.uk

Training

The DSL and DDSLs are trained to the same standard, and their job descriptions include the key activities of their role. They undertake child protection (Level 3) training and training in inter-agency working, updated at two-yearly intervals, with their knowledge and skills refreshed at least annually, for example through e-bulletins or meetings with other DSLs. This training equips the DSL and DDSLs to:

- understand the assessment process for early help and intervention, for example through locally agreed early help assessments
- have a working knowledge of locally agreed procedures for child protection and inter-agency working, including how to attend and contribute to a child protection case conference or review conference
- ensure every member of staff has access to, and understands, this policy and the **Staff Behaviour Policy**
- be alert to, and support, the specific needs of children in need, those with SEND, and young carers
- keep detailed, accurate and secure written records of concerns and referrals
- understand and support the Prevent Duty and provide advice to staff on protecting pupils from radicalisation
- attend relevant refresher training, including on harmful sexual behaviour in children
- encourage a culture of listening to pupils and taking account of their wishes and feelings

Managing Referrals

- take lead responsibility for referring cases of suspected abuse, neglect or exploitation of any pupil to children's social care, working with the Kingston and Richmond Safeguarding Children Partnership (KRSCP), or other local authorities as appropriate. The DSL must be aware of pupils who have a social worker and ensure they are supported appropriately
- support staff who make referrals to children's social care
- take lead responsibility for referrals to the Disclosure and Barring Service (DBS) and, where relevant, the Teaching Regulation Agency (TRA), where a member of staff is dismissed or resigns in circumstances involving actual harm or risk of harm to a pupil
- take lead responsibility for referrals to the police where a crime may have been committed involving a pupil
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding, including when deciding whether to make a referral

Working with Others

- act as the point of contact with the safeguarding partners, particularly Achieving for Children and the KRSCP, and attend the KRSCP DSL termly forums

- liaise with The Headmaster (or Head of Hampton Pre-Prep & Prep) in respect of police investigations or investigations under section 47 of the Children Act 1989 involving the Trust, including awareness of the requirement for pupils to have an Appropriate Adult
- as required, liaise with the case manager and the LADO for child protection concerns involving a member of staff
- liaise with key pastoral staff, School Counsellors, the SEND department and mental health trainers on matters of safety and safeguarding
- promote supportive engagement with parents and carers in safeguarding and promoting the welfare of pupils

Raising Awareness

- ensure this policy is reviewed annually and that its procedures and implementation are regularly reviewed and updated, working with the Governing Body
- ensure this policy is available publicly
- ensure parents are aware that referrals about suspected abuse, neglect or exploitation may be made to children's social care, and of the Trust's role in this
- maintain links with the KRSCP to ensure staff are aware of training opportunities and local safeguarding policies
- take responsibility for online safety, understanding the risks and the additional risks faced online by pupils with SEND

Information Sharing and Managing Child Protection Records

- ensure child protection files are kept up to date and held confidentially and securely, with detailed, accurate records of concerns and referrals
- understand the importance of information sharing, both within the School and with other schools, safeguarding partners and other agencies
- ensure that when a pupil leaves the School, the child protection file is transferred to the new school as soon as possible, and in any event within five School days for an in-year transfer or within the first five days of the new term, considering whether it would be appropriate to share information in advance of the pupil leaving

Prevent

The DSL is responsible for ensuring that the Trust's Prevent Duty is met and will complete appropriate Prevent awareness training. The DSL will refer cases to the Channel programme where there is a radicalisation concern and will support staff who make such referrals.

Appendix 2 - Types and Signs of Abuse

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by a single definition or label; in most cases, multiple issues overlap, and staff should always be vigilant and raise any concerns with the DSL or a DDSL. Safeguarding incidents and behaviours can be associated with factors outside the School, and children can be vulnerable to multiple extra-familial harms, including sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines. Technology is a significant component of many safeguarding issues, and abuse often takes place concurrently online and in daily life, including abusive, harassing or misogynistic messages and the non-consensual sharing of indecent images between peers. In all cases, if staff are unsure, they should speak to the DSL or a DDSL.

Physical Abuse

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

Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Emotional Abuse

The persistent emotional maltreatment of a child, such as to cause severe and adverse effects on their emotional development. This may include conveying that a child is worthless or unloved, denying them opportunities to express their views, silencing or mocking them, imposing developmentally inappropriate expectations, overprotection, exposure to the ill-treatment of another, or serious bullying, including cyberbullying. Some level of emotional abuse is involved in all types of maltreatment, although it may also occur alone.

Sexual Abuse

Involves forcing or enticing a child to take part in sexual activities, whether or not they are aware of what is happening. This may involve physical contact, including penetrative or non-penetrative acts (and including penetration with an object), or non-contact activities such as involving children in looking at sexual images or grooming a child in preparation for abuse, including online. Sexual abuse is not solely perpetrated by adult males: women and other children can also commit acts of sexual abuse. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not.

There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Sexual abuse includes sexual violence and sexual harassment, which can occur between two pupils of any sex, and can also occur through a group of pupils sexually assaulting or harassing a single pupil or group of pupils. A single act, such as kissing or touching someone without consent, can constitute sexual assault.

Sexual Harassment

Unwanted conduct of a sexual nature that can occur online or offline, inside or outside School. It may include sexual comments, jokes or taunting, unwanted physical contact, upskirting, or the sharing of unwanted explicit content, and may include the consensual or non-consensual sharing of nude or semi-nude images (see below). Online sexual harassment may be standalone, or part of a wider pattern of harassment or violence.

Harmful Sexual Behaviour

- Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term "harmful sexual behaviour" (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face (both physically and verbally), or both. HSB should always be considered within a child protection context. HSB exists on a continuum and may escalate into sexual harassment or sexual violence. This is consistent with the Hackett Continuum, which distinguishes between developmentally normal, inappropriate, problematic, abusive and violent sexual behaviours.
- The school will respond to all signs, reports and concerns of HSB, sexual harassment and sexual violence, including where behaviour falls at the lower end of the continuum. Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support. Sexual behaviour between children may be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled, has SEND or is smaller in stature.

Sharing of Nude or Semi-Nude Images, Videos or Live Streams, Including Those Generated Using AI

The sending or posting of nude or semi-nude images, videos or live streams by young people under 18, whether via social media, gaming platforms, chat apps, forums or offline sharing services such as AirDrop. Images may be self-generated, taken by another person, or digitally altered or wholly generated using AI, sometimes described as deepfakes. Motivations are not always sexual or criminal: images may be shared consensually within relationships, but a young person may also be coerced into sharing an image, or images may be found online, digitally manipulated, or used to abuse a young person by sharing them more widely without consent. The DSL will classify and manage such incidents in accordance with the guidance *Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People*.

Upskirting

A criminal offence involving 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 to cause humiliation, distress or alarm. Anyone of any sex can be a victim.

Neglect

The persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of their health or development. This may involve a parent or carer failing to provide adequate food, clothing or shelter, failing to protect a child from harm, failing to ensure adequate supervision, failing to ensure access to appropriate medical care or repeatedly sending a child to school without essential medication.

Child Sexual and Criminal Exploitation

Child sexual exploitation (CSE) occurs where an individual, group or organised network or gang takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, often in exchange for something the victim needs or wants, or for the advantage of the perpetrator. The victim could potentially be part of such a group or gang.

Child criminal exploitation (CCE) follows the same pattern in relation to criminal activity and does not always involve physical contact; it can occur through technology. Both forms of exploitation may occur even where the activity appears consensual, and a child may not recognise their experience as exploitation.

Where CSE or CCE is identified, a modern slavery referral should be considered.

County Lines

A term used to describe gangs and organised criminal networks exporting illegal drugs, using dedicated mobile phone lines. Children can be targeted and recruited in a number of settings, including schools, and are increasingly targeted online. Indicators may include a pupil going missing and being found in areas away from home, involvement in moving drugs or money, being found in unfamiliar accommodation, or having an unexplained 'debt bond' to their exploiters.

Modern Slavery

Encompasses human trafficking, slavery, servitude and forced or compulsory labour, which can take many forms including sexual exploitation, forced criminality and the removal of organs. Further information on identifying and supporting victims is set out in the statutory guidance Modern Slavery: How to Identify and Support Victims.

Cybercrime

Criminal activity committed using computers or the internet, broadly categorised as cyber-enabled (crimes that can happen offline but are enabled at scale online) or cyber-dependent (crimes that can only be committed using a computer), such as unauthorised access to a school's computer network, denial of service attacks, or the making or supplying of malware. Where there are concerns about a pupil in this area, the DSL may consider referring into the Cyber Choices programme.

Serious Violence

Indicators that a pupil may be at risk from, or involved with, serious violent crime include increased absence from School, a change in friendships with older individuals, a decline in performance, signs of self-harm, unexplained gifts or possessions, or signs of assault or unexplained injuries.

So-Called Honour-Based Abuse

Encompasses crimes committed to protect or defend the honour of a family or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. While Hampton School is a boys' school, there are girls at Hampton Pre-Prep, and Hampton pupils and staff are also involved in activities with girls at neighbouring schools; staff should be alert to the possibility that a pupil's sibling or family member may be at risk. Abuse in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

Indications that a girl may already have been subjected to FGM can include difficulty walking, sitting or standing; frequent urinary, menstrual or stomach problems; prolonged or repeated absence from School, sometimes with noticeable behaviour change on return; and reluctance to undergo medical examination. There is a statutory duty on teachers to report to the police personally where they discover that FGM appears to have been carried out on a girl under 18. Where staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL, who will activate local safeguarding procedures.

Staff should be aware of the 'One Chance Rule' in relation to forced marriage, FGM and honour-based abuse. There may be only one opportunity to intervene and support a pupil before they are removed from the School's reach or placed at greater risk. Staff must therefore act promptly on any concern or disclosure and must not delay referral while attempting to investigate or establish the full circumstances themselves.

Forcing a person into marriage is a crime in England and Wales, whether through violence, threats or any other form of coercion, and since February 2023 it has also been a crime to cause a child to marry before

their 18th birthday even without violence or threats. Staff can contact the Forced Marriage Unit for advice on 020 7008 0151 or fmufco.gov.uk.

Radicalisation

The process by which a person comes to support terrorism and forms of extremism. Extremism is the promotion of an ideology based on violence, hatred or intolerance that seeks to negate the rights and freedoms of others or to undermine UK parliamentary democracy. There is no single way of identifying whether a pupil is susceptible to an extremist ideology; background factors combined with specific influences, such as family, friends or online content, may contribute. Staff should be alert to changes in a pupil's behaviour and use their judgement in deciding whether to make a Prevent referral, discussing any concerns with the DSL first. Further detail is set out at Appendix 4 of this policy.

Domestic Abuse

The Domestic Abuse Act 2021 introduced the first statutory definition of domestic abuse, recognising children as victims in their own right where they see, hear or experience the effects of abuse. The definition captures physical, emotional and economic abuse and coercive and controlling behaviour between those aged 16 or over who are personally connected. Young people can also experience abuse within their own intimate relationships, sometimes called teenage relationship abuse; where there are concerns about safety or welfare, child safeguarding procedures should always be followed, regardless of whether the statutory definition applies.

SEND and Certain Health Conditions

Pupils with SEND or certain health conditions can face additional safeguarding challenges, may not outwardly show signs of abuse, and may find it harder to communicate about abuse, neglect or bullying. Staff should be alert to the risk of assumptions that indicators of possible abuse relate only to a pupil's condition, and to the potential for disproportionate impact from peer group isolation or bullying. Staff will support such pupils in expressing any concerns and will discuss any signs or indicators with the DSL as appropriate.

Lesbian, Gay, Bisexual or Trans (LGBT) Pupils and Gender-Questioning Children

A pupil being LGBT is not in itself a risk factor for harm, but LGBT pupils, and those perceived to be LGBT, can be targeted by their peers and may be just as vulnerable as those who identify as LGBT. When supporting a gender-questioning child, the School takes a cautious approach, considering the pupil's

individual needs in partnership with their parents other than in the rare circumstances where involving parents would create a risk of harm, and taking into account any available clinical advice.

Children Who Are Absent from Education

A pupil absent from School, particularly repeatedly or for prolonged periods, is a potential indicator of a range of safeguarding issues including abuse, neglect, exploitation, CSE and CCE, and may indicate mental health problems, risk of substance abuse, risk of FGM, or risk of forced marriage. Staff must follow the School's procedures for pupils who go missing, set out in the School's **Missing Pupil Policy**, and all unexplained absences will be followed up accordingly. The School will inform the local authority of any pupil added to or removed from the admission register at a non-standard transition point, and of any pupil who fails to attend regularly or has been absent without permission for a continuous period of ten School days.

Child Abduction and Community Safety

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child, and can be committed by family members, people known to the victim, or strangers. As pupils grow older and gain more independence, they are given practical advice on how to keep themselves safe, focused on building confidence and abilities rather than warning against all strangers.

Children with a Family Member in Prison

A significant number of children in England and Wales have a parent sent to prison each year, and these children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders provides information to support professionals working with these families.

Racism and Discrimination

Racist incidents and other discriminatory behaviour will be addressed in accordance with the School's equality, behaviour and anti-bullying procedures. However, repeated racist incidents or a single serious incident may constitute a safeguarding concern and should be referred to the DSL for consideration under child protection procedures. Incidents will be recorded and monitored in accordance with the School's relevant procedures.

Appendix 3 - Arrangements for Dealing with Child-on-Child Allegations, Including Child-on-Child Sexual Violence and Harassment

Children with Special Educational Needs and Disabilities (SEND)

Pupils with SEND are up to three times more likely to be abused by their peers than pupils without SEND and may face additional barriers to reporting. The School considers additional pastoral support for these pupils and remains alert to the potential for peer group isolation or bullying.

Steps to Minimise the Risk of Child-on-Child Abuse

- delivering a curriculum, through PSHE and Relationships Education, that builds pupils' understanding of healthy relationships, consent and respectful behaviour
- providing regular staff training on recognising and responding to child-on-child abuse, including harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry
- ensuring pupils know how to report concerns, and that reports will be taken seriously and acted upon
- monitoring incidents to identify any patterns or concerning trends and pupils who may need additional support
- working with staff, pupils and parents to promote a culture of tolerance and respect across the School community
- creating a culture in which pupils feel able to share concerns openly, in a non-judgemental environment, and have them listened to
- actively referring concerns or allegations of child-on-child abuse to the police and children's social care where necessary

Procedure to Be Followed in the Event of Child-on-Child Abuse

Where an issue of pupil behaviour or bullying gives reasonable cause to suspect that a pupil is suffering, or is likely to suffer, harm, staff should follow the procedure below (and Part Five of Keeping Children Safe in Education 2026) rather than the School's Anti-Bullying and Behaviour policies:

- Any report of child-on-child abuse will be thoroughly investigated, taking account of the wider context in which it may have occurred. The School will ensure a safeguarding response is in place for both the pupil who has allegedly experienced the abuse and the pupil who has allegedly been responsible for it.
- Unless it is considered unsafe to do so, the DSL will usually discuss the proposed action with the pupil(s) and their parents and obtain consent to any referral before it is made.
- If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care and/or the police should be made immediately. Anyone can make a referral; where a referral is not made by the DSL or a DDSL, the DSL should be informed as soon as possible.
- Any member of staff who is concerned that a pupil may be at risk of, or experiencing, abuse by a peer, or may be at risk of abusing a peer, should discuss the concern with the DSL or a DDSL without delay.
- The DSL will use professional judgement to determine whether the alleged behaviour can be dealt with internally and, if so, whether external specialist support is required. Where the DSL considers or suspects that the behaviour might be abusive or violent, the DSL will contact children's social care immediately. Options for managing the concern may include managing it internally with external specialist support, undertaking or contributing to an inter-agency early help assessment, referring the pupil(s) for a statutory assessment under section 17 or 47 of the Children Act 1989, and/or reporting alleged criminal behaviour to the police.

- Where there is an incident of child-on-child abuse, the School will carry out a robust risk and needs assessment for each pupil affected. This will assess and address the level of risk posed to or by the pupil, engage the pupil's parents and draw on local services, consider whether any targeted intervention is needed, and be reviewed at regular intervals in light of the pupil's ongoing needs.
- If a pupil's needs escalate at any stage, the DSL will refer the situation to children's social care again to determine the appropriate course of action.

Pupil Suspension

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the KRSCP on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved, including the alleged victim and perpetrator(s). Where a pupil is interviewed by the police, the School will ensure that, subject to KRSCP advice, parents are informed as soon as possible and that the pupil is supported by an appropriate adult until the investigation concludes.

Police Referrals

The police may be informed of any harmful sexual behaviour that is potentially criminal in nature. Where a report has been made, the School will consult the police to agree what information can be disclosed to staff, the alleged perpetrator(s) and their parents. If the DSL decides to make a referral against a victim's wishes, the reasons will be explained to the pupil and appropriate specialist support offered.

Sharing of Nude or Semi-Nude Images and Videos

The School's approach to the sharing of nude or semi-nude images and videos, including those generated using AI, is set out under 'Responding to Specific Safeguarding Issues' in the main body of this policy.

Appendix 4 - The Prevent Duty: Preventing Radicalisation and Extremism

From 1 July 2015, specified authorities, including all schools, have been subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent Duty. Schools must have regard to the statutory Prevent guidance, which summarises the requirements in terms of four themes: risk assessment, working in partnership, staff training and IT policies.

- The School assesses the risk of pupils being drawn into terrorism, including support for extremist ideas, and has clear procedures in place for protecting pupils at risk of radicalisation, set out within this policy.
- The Prevent Duty builds on existing local partnership arrangements. The Governing Body ensures that the School's safeguarding arrangements take account of KRSCP policies and procedures.
- The DSL undertakes Prevent awareness training and is able to provide advice and support to other staff on protecting pupils from the risk of radicalisation.
- The School ensures pupils are safe from terrorist and extremist material when accessing the internet through the School's systems and teaches pupils about online safety more generally.
- The School ensures all visiting speakers are suitable and appropriately supervised, in accordance with Appendix 7 of this policy.

The Channel Programme

Channel is a voluntary, confidential programme providing support at an early stage to those identified as vulnerable to being drawn into terrorism. It provides a mechanism for the School to make referrals, and an individual's engagement is entirely voluntary at all stages.

Indicators of Vulnerability

This is not an exhaustive list, and vulnerability may manifest itself in other ways.

- Identity crisis: distance from cultural or religious heritage and discomfort with one's place in society
- Personal crisis: family tensions, a sense of isolation, low self-esteem, or a shift towards a new and different group of friends
- Personal circumstances: migration, community tensions, or a sense of grievance triggered by personal experience of discrimination
- Unmet aspirations: perceptions of injustice, feelings of failure, or rejection of civic life
- Criminality: experience of imprisonment, poor reintegration, or involvement with criminal groups

Access to Extremism

- association with individuals known to be involved in extremism, directly or through key locations
- evidence of accessing the internet for extremist activity or possessing extremist literature
- involvement with, or likely involvement with, extremist training or locations
- sympathy for, or support of, illegal or illicit groups, or articulated support for extremist causes

Experiences, Behaviours and Influences

- evidence of extremist ideological, political or religious influence, including vocal support for terrorist attacks or justification of violence
- a noticeable change in behaviour linked to international events in areas of conflict
- a significant shift in behaviour or appearance suggesting a new social, political or religious influence
- conflict with family over religious beliefs, lifestyle or dress choices

- Witnessing or being a perpetrator or victim of a racial or religious hate crime
- a pattern of regular or extended travel associated with extremist training or activity

Social Factors

- experience of poverty, disadvantage, discrimination or social exclusion
- learning difficulties or mental health support needs
- uncertain immigration or national status
- a significant adult in the young person's life holding extremist views

Appendix 5 - Guidance for Staff, Governors and Volunteers on Suspecting or Hearing a Complaint of Abuse

Action Staff, Governors and Volunteers Must Take

A member of staff, Governor or volunteer suspecting or hearing a complaint of abuse must:

- listen carefully to the pupil and keep an open mind; the person receiving the disclosure should not decide whether abuse has taken place
- not ask leading questions, that is, a question which suggests its own answer
- reassure the pupil but not give a guarantee of absolute confidentiality, explaining that the information needs to be passed to the DSL so that the correct action is taken
- keep a sufficient written record of the conversation using the Log of a Concern form at Appendix 9. The record should include the date and time, the place of the conversation, and the essence of what was said and done, by whom and in whose presence.

Appendix 6 - Dealing with Allegations or Concerns About Members of Staff, the Headmaster, Governors or Volunteers

Procedures Following an Allegation or Concern About a Member of Staff, The Headmaster or Head of Pre-Prep & Prep, a Governor or a Volunteer's Behaviour Towards a Pupil

On receiving an allegation or concern, the case manager (usually The Headmaster or Head of Hampton Pre-Prep & Prep), or the Chair of Governors where the allegation concerns The Headmaster or Head of Hampton Pre-Prep & Prep, will consider the nature of the allegation and whether it warrants a referral to the LADO. Where a referral is required, the case manager will contact the LADO within one working day.

The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of an investigation will record whether the allegation is substantiated, unsubstantiated, false, malicious, or unfounded. Reviews are conducted at fortnightly or monthly intervals depending on the complexity of the case, with the first review taking place no later than four weeks after the initial assessment.

The case manager will discuss with the LADO whether a referral to the DBS or TRA should be made where an allegation is substantiated and the individual is dismissed, resigns, or the School otherwise ceases to use their services. The School has a legal obligation to report promptly to the DBS any person who has harmed, or poses a risk of harm to, a child.

Duty of Care

The School has a duty of care towards its employees and, while the welfare of a pupil is paramount, will ensure that effective support is provided for anyone facing an allegation, in accordance with Part four of KCSIE and the Trust's employment practices and procedures.

Ceasing to Use Staff

If the Trust ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement or compromise agreement will not be used, and a referral to the DBS will be made as soon as possible if the criteria are met. Any such incident will be followed by a review of the Trust's safeguarding procedures, with a report presented to the Governors without delay. If a member of staff resigns, or ceases to provide their services, any child protection allegations will still be followed up in accordance with this policy. Where a teacher has been dismissed for serious misconduct, or would have been dismissed had they not resigned, separate consideration will be given as to whether a referral to the TRA should be made.

Unsubstantiated, False or Malicious Allegations

If a report is shown to be deliberately invented or malicious, the School will consider whether disciplinary action is appropriate against the individual who made it, in accordance with the School's own disciplinary and behaviour policies. Where an allegation by a pupil is shown to be deliberately invented or malicious, The Headmaster or Head of Hampton Pre-Prep & Prep will consider whether to take disciplinary action in accordance with the Trust's behaviour and discipline policies. Where a parent has made a deliberately invented or malicious allegation, The Headmaster or Head of Hampton Pre-Prep & Prep will consider whether to require that parent to withdraw their child from the Trust, on the basis that they have treated the Trust or a member of staff unreasonably, in accordance with the Trust's Terms and Conditions. Whether or not the person making the allegation is a pupil, parent or other member of the public, the Trust reserves the right to contact the police to determine whether any action might be appropriate. Record Keeping

Record Keeping

Details of allegations found to be malicious will be removed from personnel records. For all other allegations, full details will be recorded on the confidential personnel file of the person accused and retained at least until the individual has reached normal retirement age, or for ten years from the date of the allegation, whichever is longer. An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references.

Low Level Concerns

The Safeguarding Policy aims to facilitate a culture in which the values and expected behaviours set out in the Trust's Staff Behaviour Policy are practised and reinforced by all staff. Full guidance is set out in the Low-Level Concerns Policy at Appendix 10 of this policy, which can also be downloaded from Cezanne. Low-level concerns forms can be accessed via SharePoint (Hampton School) or Cezanne (HPP&P).

Appendix 7 - Visiting Speakers

The Trust is required to maintain a register of all visiting speakers, that is, visitors to the Trust who give talks, seminars or practical workshops, to ensure all speakers are suitable and appropriately supervised.

Members of staff organising a visit must complete and submit this form for every visiting speaker, no later than one week before the proposed visit. It should be passed to the DSL or a DDSL at Hampton School or Hampton Pre-Prep & Prep. Staff responsible for a visiting speaker are reminded that all visitors to the Trust must be signed in and out and badged at Reception on arrival, with their identification checked; collected from Reception by a member of staff; and supervised at all times while on the School site and must never be placed in a position of being alone with pupils.

Name of visiting speaker	
Organisation represented	
Subject or title of the talk	
Will online platforms be used? Discuss with a member of the Senior Leadership Team first.	
Member of staff responsible for the visit	
Date and timings of the visit	
Year Group or Form	
Confirmation that the speaker poses no risk of promoting extremism or radicalisation	
Confirmation that the speaker will be accompanied at all times and will not be placed in a one-to-one situation with a pupil	

Name (please print): _____ Signed: _____ Date: _____

To be completed by the DSL or a DDSL:

Approval is given for the talk, lecture or workshop: Yes / No. A risk assessment is required: Yes / No.

Signed: _____ Date: _____

Appendix 8 - Related School Policies

- AI Acceptable Use Policy
- Anti-Bullying Policy*
- Behaviour, Rewards, Sanctions, Discipline and Exclusions Policy *
- EYFS Policy
- Health and Safety of Pupils on Educational Visits Policy *
- Looked After Children Policy
- Low-Level Concerns Policy
- Mental Health Policy
- Missing Pupil Policy
- Mobile Phones & Smart Devices Policy
- Online Safety Policy
- Recruitment, Selection and Disclosure Policy
- Restrictive Intervention (Use of Reasonable Force) Policy
- Social Media Policy
- Staff Behaviour Policy
- Whistleblowing Policy

***Indicates each school within the Trust has its own policy.**

Appendix 9 - Log of a Concern About a Pupil's Safety and Welfare

Pupil's name		D.O.B.	
Date		Time	
Name of person raising concern (print)	Signature		
Position in School			
Reason(s) for recording the incident			
Who?			
What?			
Where?			
When?			
Opinion, where relevant (how and why might this have happened?)			
Action taken, including names of anyone to whom the information was passed			

This form should be submitted to the DSL

Appendix 10 - Low-Level Concerns Policy

Introduction

This policy applies to the Hampton School Trust (the Trust or the School), which comprises Hampton School and Hampton Pre-Prep & Prep School (HPP&P), for children from the Early Years Foundation Stage (EYFS) to the Upper Sixth Form.

As part of their whole school approach to safeguarding, schools should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including Governors, supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. (See Part Four, section one of Keeping Children Safe in Education 2026 (*KCSIE 2026*) and Appendix 5 of the Hampton School Trust Safeguarding Policy for how to deal with allegations that might indicate a person will pose a risk of harm if they continue to work with children).

A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the **Staff Behaviour Policy**, including inappropriate conduct outside of work. The term ‘low level’ concern does not mean that it is insignificant. Early identification and prompt management of all concerns about the behaviour of adults who work or volunteer with children is critical to effective safeguarding. *KCSIE 2026* requires low level concerns to be shared.

Staff are required to share low level concerns in this way:

- To ensure there is a formalised mechanism for reporting low level concerns;
- To allow staff to self-report to the School to protect themselves in situations where they may have found themselves compromised;
- To identify patterns of behaviour that are concerning; and
- To ensure the School continues to have a culture of safeguarding in which all staff understand their responsibility to raise concerns.

Staff should therefore:

- a) **report any behaviour by another adult** towards a pupil or another child that may have concerned them
- b) **self-report** in any situation where they feel their behaviour towards a pupil, or another young person could be misinterpreted or misconstrued or leave them vulnerable.
- c) disclose any relationships or associations, whether within or outside the workplace and including online relationships, where these may create a safeguarding concern or have implications for their professional relationship with pupils.

Concerns regarding the behaviour of another adult towards a child – low level reports

A low level concern report should be used when a member of staff is concerned about the behaviour of another adult towards a pupil or another child. This is not just where it is clear that a professional boundary has been broken: anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils should be notified, in order to protect both pupils and the members of staff involved. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate.

A member of staff who makes a low level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the **Whistleblowing Policy**. Some of the circumstances (this is a non-exhaustive list) in which staff must make a low level concern report might be when they are concerned that a member of staff has:

- Used sexually inappropriate language, references or jokes to a pupil;
- Been overfriendly with pupils, allowing first names to be used, or encouraging the use of nicknames of staff or pupils; or having favourites
- Has taken photographs of children on a mobile phone
- Has engaged with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- Has emailed, messaged, or used social media sites or other communication between adults and pupils outside agreed protocols;

Self-reporting

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Trust's **Staff Behaviour Policy**.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how these might be perceived.

Almost always, there will be a perfectly innocent explanation for what has occurred, and staff should not feel awkward about making a report or being the subject of a report. Reporting these types of concerns is a neutral act and the Designated Safeguarding Lead (DSL) – Mr Owen Morris (Deputy Head) or Ms Tammy Howard (at HPP&P), or the Deputy Designated Safeguarding Leads (DDSL's) – Ms Pippa Message (Deputy Head) and Mr Mark Nicholson (Deputy Head) at Hampton, or Mrs Imogen Murphy at HPP&P - will, on receiving a report, decide how to best approach the concern raised.

Examples of circumstances where staff should self- report their behaviour:

- any incident where s/he feels his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk of misinterpretation;
- if they have emailed, messaged, or used of social media sites or other communication between adults and pupils outside agreed protocols;
- any incident of physical contact with a pupil when no one else is present, including when administering first aid or medical treatment (School medical staff are exempt from this requirement), and including physical demonstrations in one-to-one sports coaching, music lessons, etc;

- any incident where a staff member has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- any social contact with pupils outside of School (other than planned/authorised events, educational visits or trips, or insignificant incidents such as passing a pupil in the street or in a shop or noticing they are sitting, separately, in the same restaurant or cinema) particularly where the member of staff and/or pupil(s) is/are under the influence of alcohol;
- if a pupil becomes aware of and/or uses a staff members home address, mobile or home phone number, or non-school e-mail address other than in line with agreed protocols;
- the fact of, and explanation for, any one-to-one contact with a pupil on School trips, particularly if this takes place in a private space such as a bedroom;
- non-trivial illnesses or accidents of pupils on School trips;
- any incident where, for whatever reason, a member of staff has not complied with the **Staff Behaviour Policy**.

This is not an exhaustive list. Staff who are unsure of whether to self-report are at liberty to discuss the matter with a member of the safeguarding team on a no-names basis. However, following such a discussion, should it be felt that the matter reaches the threshold for notification the member of staff will be expected to refer it. If in doubt, a referral should always be made.

Hampton School – Sharing a Low Level Concern – the process

- Low level concerns should be reported to the DSL. Alternatively, reports can be made to those members of SLT who are also DDSL's, who will pass these reports to the DSL. All reports will be shared by the DSL with The Headmaster.
- Where the low level concern relates to The Headmaster, or where there is a conflict of interest in reporting the matter to The Headmaster, **this should be reported directly to the Chair of Governors** (chair@hamptonschool.org.uk).
- Low level concerns can be made in person, but staff are also encouraged to use the email address: lowlevelconcerns@hamptonschool.org.uk. Alternatively, they can download a Low Level Concerns Form (**Appendix 1 of this Low Level Concerns policy**) which is available via SharePoint.

Recording low level concerns

All low level concerns should be recorded in writing by the DSL. The record should set out the details of the concern, the context in which the concern arose and action taken. The name of the individual sharing their concerns should also be noted but if the individual wishes to remain anonymous that should be respected as far as possible. Records will be held securely by the DSL on a password protected file.

Low level concerns will be shared with The Headmaster. The Headmaster and DSL will review the records so that potential patterns of concerning problematic or inappropriate behaviour can be identified. They will consider whether the reported matter is a low level concern and whether it should be reclassified as an allegation and dealt with as outlined in **Appendix 6** of the **Safeguarding Policy**. Where there is in any doubt whatsoever about the classification of a reported concern (whether a low-level concern in fact meets the harm threshold), The Headmaster, or DSL (as appropriate) will seek advice from the Local Authority Designated Officer (LADO).

Having established that the concern is low level, The Headmaster or DSL (as appropriate) will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the low level concern has been raised by a third party, in the investigation The Headmaster or DSL will speak to the individual who raised the concern, to any witnesses and to the person involved. Most low level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. This might lead to internal disciplinary procedures, referral of an individual to the LADO or the consideration of amendments to other policies and procedures that could be revised to minimise further risks. Low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be retained and kept confidential, they will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times.

Hampton Pre-Prep & Prep School - Sharing a Low Level Concern – the process

- Low level concerns should be reported to the Head of Hampton Pre-Prep & Prep or the Designated Safeguarding Lead (DSL) at HPP&P.
- Where the low level concern relates to the Head of Hampton Pre-Prep & Prep or where there is a conflict of interest in reporting the matter to the Head of Hampton Pre-Prep & Prep, **this should be reported directly to The Headmaster of the Trust.**
- Low level concerns can be made in person, but staff are also encouraged to use the email address: lowlevelconcerns@hamptonschool.org.uk. Alternatively, they can download a Low Level Concerns Form (**Appendix 1 of this Low Level Concerns policy**) which is available via SharePoint.

Recording low level concerns

Low level concerns at HPP&P will be dealt with in the same way as described above, but by the HPP&P DSL and the Head of Hampton Pre-Prep & Prep.



HAMPTON SCHOOL TRUST



Low Level Concern Form

Please use this form to **share any concern** – even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with the Hampton School Trust **Staff Behaviour Policy**, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Staff should also **self-report** if they feel their behaviour towards a pupil or another young person could be misinterpreted or misconstrued or leaves them vulnerable

Please provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

Details of concern:

Signed:.....

Name:..... Date:.....

Appendix 11 - Safeguarding Summary Sheet: Weekends and Out-of-Hours

All staff who work after the School day has ended, or at weekends, should be aware of their safeguarding responsibilities and the procedures to follow if they have concerns.

If a Pupil Wants to Speak to a Member of Staff

- Listen to the pupil and be supportive
- Never promise confidentiality
- If they mention anything that raises concerns about their safety or that of another pupil, report it to the Safeguarding staff
- Do not contact parents until this has been discussed with the Safeguarding staff

What to Look Out For

There is no complete list, but common concerns would include a pupil who behaves unusually, appears distressed, confused or disturbed, does not want to go home, or is left on their own at School.

If You Are Concerned About the Behaviour of an Adult

All staff are required to report any concern or allegation about a colleague's behaviour that is likely to put pupils at risk of abuse or serious harm. There will be no retribution against the reporter, in accordance with the **Whistleblowing Policy**; the NSPCC whistleblowing helpline is 0800 028 0285. Low-level concerns should also be reported, using the process set out at Appendix 10. Concerns about staff conduct at Hampton School should be reported to The Headmaster at headmaster@hamptonschool.org.uk and at HPP&P, to the Head of Hampton Pre-Prep & Prep (p.barr@hamptonprep.org.uk).

What to Do if You Suspect a Pupil Is at Risk of Harm

Contact one of the Designated Safeguarding staff: Owen Morris (DSL), or Pippa Message, Mark Nicholson, Polly Holmes or Victoria Smith (DDSLs) at Hampton School; or Tammy Howard (DSL) or Imogen Murphy (DDSL) at Hampton Pre-Prep & Prep. To contact a member of the Safeguarding staff at weekends or after the School day has ended, use the Keepers' mobile phone (07825 428681), which holds key staff mobile numbers, or email safeguarding@hamptonschool.org.uk. The Bursar or Deputy Bursar can also provide advice or help contact others, again via the Keepers' mobile phone.

In most cases, staff should pass concerns about a pupil to the Safeguarding staff; however, everyone who works with children shares responsibility for ensuring they are safe, and anyone can, and must, make their own referral to the local authority if a pupil is at risk: Richmond Single Point of Access (SPA) on 020 8547 5008, or 020 8770 5000 out of hours; email spa@richmond.gov.uk. In an emergency, dial 999.

Appendix 12 - Safeguarding Reporting Summary for Staff (Hampton School)



HAMPTON SCHOOL
HMC INDEPENDENT SCHOOL FOR BOYS, FOUNDED IN 1537

SAFEGUARDING REPORTING SUMMARY FOR STAFF



Appendix 13 - Safeguarding Reporting Summary for Staff (Hampton Pre-Prep & Prep)



HAMPTON
PRE-PREP & PREP SCHOOL

SAFEGUARDING REPORTING SUMMARY FOR STAFF

If you suspect
a **CHILD**
is at risk

Contact the Designated
Safeguarding Lead (DSL)



Tammy Howard
020 8979 1844 Ext. 4467
t.howard@hamptonprep.org.uk

If DSL is unavailable
Contact the Deputy Designated
Safeguarding Lead below:
(you can contact the DSL/DDSL via
safeguarding@hamptonprep.org.uk)



Imogen Murphy
020 8979 1844 Ext. 4480
i.murphy@hamptonprep.org.uk

If DSL/DDSL are unavailable
contact DSL Hampton School



Owen Morris
(DSL Hampton School)
020 8979 5526 Ext. 4400
o.morris@hamptonschool.org.uk

If all of the above are unavailable
and child is at immediate harm

London Borough of Richmond – Single Point of Access (SPA):
020 8547 5008 or 020 8770 5000 (after hours)
spa@richmond.gov.uk

Concerns about the
behaviour of a
member of **STAFF**

Contact the Head of
Hampton Pre-Prep & Prep



Phil Barr
020 8979 1844 Ext. 4461
p.barr@hamptonprep.org.uk

If the Head of Hampton Pre-Prep & Prep
is unavailable (or if the concern is about
him/there is a conflict of interest)

Contact the
Chair of Governors

Andrew Munday
chair@hamptonschool.org.uk

A concern about the Chair of Governors
should be reported to the
LADO 020 8891 7370
(out of hours on 07774 332 675)
or email
LADO@achievingforchildren.org.uk
without informing the
HM or Chair of Governors

If you have a low-level concern about an adult, or you wish to self-report any concern
Email: lowlevelconcerns@hamptonprep.org.uk
or speak to the Head of Hampton Pre-Prep & Prep, or the DSL

08.26