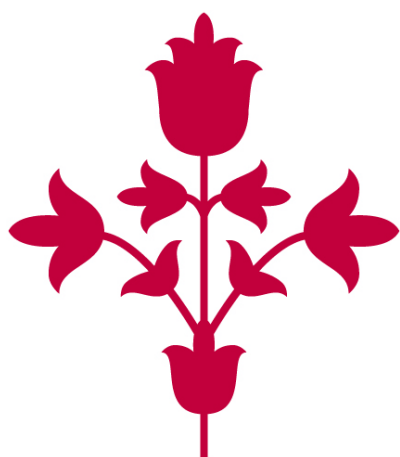




Earlscliffe



STATUTORY SCHOOL POLICY • 2026–27

Safeguarding & Child Protection

A clear, child-centred framework for everyone working at, for, or on behalf of Earlscliffe.

Headteacher Dr N Robinson

**Deputy Headteacher &
DSL** Mr L Connolly

Effective Sept 1, 2026 subject to approval and final KCSIE publication check

DRAFT FOR GOVERNANCE APPROVAL

Document control

Policy title	Safeguarding and Child Protection Policy
School	Earlscliffe
Policy owner	Mr L Connolly, Deputy Headteacher & Designated Safeguarding Lead
Accountable leader	Dr N Robinson, Headteacher
Approval authority	Governing Body
Version	2 (National College-aligned draft for governance approval)
Prepared	17 Aug 17 2026
Effective from	01 Sept 2026 (subject to approval)
Next formal review	Before Sept 1, 2027 or earlier following statutory, local or school change
Applies to	All pupils, staff, governors, proprietors, volunteers, contractors, visitors, agency staff and adults working for or on behalf of the school, including boarding and off-site activity

Approval and review record

Control	Record
Approved by	Dr N Robinson, Headteacher
Approval date	17 August 2026
Review completed by	Mr L Connolly, Deputy Headteacher/DSL
Date of next review	Before Sept 1, 2027

Changes in this edition

- Leadership updated to Dr N Robinson as Headteacher and Mr L Connolly as Deputy Headteacher and DSL; new Earlscliffe - Dukes Education branding applied.
- Aligned to KCSIE 2026, including the removal of the former condensed Annex A reading route: all staff must now read full Part One, with the Part One overview used only as a companion.
- Updated for Working Together to Safeguard Children 2026, including Family Help, anti-discriminatory practice, teenage relationship abuse and risks in residential settings.
- Updated online-safety provisions covering generative AI, synthetic and deepfake sexual content, annual filtering and monitoring review, and the statutory mobile-phone guidance effective from September 2026.
- Updated safer-recruitment provisions for the Crime and Policing Act 2026 removal of the supervision exemption for relevant volunteers and work-experience supervisors.

- Updated Kent Front Door, LADO / LESAS and escalation routes; removed obsolete instructions that treated telephone contact as the only valid referral route.
- Clarified allegations, low-level concerns, information sharing, boarding, attendance, alternative provision, reasonable force, image handling and child-on-child harmful behaviour.
- Reviewed against The National College 2026 model policy; strengthened pre-statutory support, homestay, single central record, premises, visitor, communication and implementation controls without importing template instructions or generic wording.

Safeguarding at a glance

IMMEDIATE DANGER

Call 999. If a child needs emergency medical attention, arrange it without delay. Then inform the DSL as soon as it is safe to do so.

A CONCERN ABOUT A CHILD

Act immediately. Listen, reassure, record the facts and pass the concern to the DSL or a deputy. Do not investigate, promise secrecy, ask leading questions or delay because evidence is incomplete.

A CONCERN ABOUT AN ADULT

Do not route it to the subject of the concern. Report it to the Headteacher; if it concerns the Headteacher, report it to the board-level safeguarding lead / proprietor representative. Where required, the case manager contacts Kent LADO before internal action.

A LOW-LEVEL CONCERN

Share it with the Headteacher under the Low-Level Concerns procedure. If there is uncertainty about the threshold, seek LADO advice. "Low level" does not mean insignificant.

WHISTLEBLOWING

Where normal routes feel unsafe or have not been effective, use the school whistleblowing route. Staff may also contact the NSPCC Whistleblowing Advice Line on 0800 028 0285.

Key school contacts

Safeguarding route	Name / role	Contact
Designated Safeguarding Lead Deputy Headteacher	Mr L Connolly Deputy Headteacher & DSL	safeguarding@earlscliffe.co.uk +44 (0)7716 097 487
Deputy DSL Health / wellbeing	Ms M Cordell School Nurse	mariacordell@earlscliffe.co.uk +44(0) 7515 884 467
Deputy DSL Boarding	Ms K Taylor Boarding Lead / Housemistress, 26 Grimston Gardens	karentaylor@earlscliffe.co.uk +44(0)7955 314 179
Deputy DSL Headteacher	Dr N Robinson	nicolarobinson@earlscliffe.co.uk
Board-level safeguarding lead	Paul Ludlow Dukes Education	paul.ludlow@ dukeseducation.com +44(0)7584 012 130

The names and direct details of deputy DSLs and the board-level safeguarding lead are carried forward from the previous policy and must be confirmed as part of approval. Current contact details must also be displayed prominently in school and in boarding accommodation.

Kent and emergency routes

Child at immediate risk	999
Kent Integrated Children's Services urgent daytime	03000 41 11 11
Kent out-of-hours service	03000 41 91 91
Professional referral	Kent Integrated Children's Services Portal - professional Front Door
Allegation about an adult	Kent LADO referral through the Kent portal; LESAS enquiry form for threshold advice
Police non-emergency	101
Prevent advice / referral	prevent@kent.gov.uk / preventreferrals@kent.police.uk

If the DSL is unavailable

Safeguarding action must never wait for a particular person. Contact a deputy DSL. If no trained safeguarding lead is available and a child may be at risk, make the referral to children's social care or police yourself, then inform the DSL as soon as practicable. The school maintains robust cover, including for boarding, evenings, weekends, holidays and off-site activity.



Earlscliffe



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1. Purpose, scope and core principles

Earlscliffe is committed to providing an environment in which every child is safe, heard, respected and able to flourish. Safeguarding and promoting the welfare of children is everyone's responsibility. The school takes a child-centred and coordinated approach: the welfare and best interests of the child are the primary consideration in every safeguarding decision.

For this policy, a child is anyone under the age of 18. Safeguarding includes help and protection from maltreatment inside or outside the home, including online; preventing impairment of mental and physical health or development; ensuring safe and effective care; promoting upbringing by a child's family where consistent with welfare; and taking action so that all children have the best outcomes.

The policy applies wherever the school owes a duty of care, including education, boarding, transport, trips, activities, placements, remote learning, online contact, use of school premises by third parties and interactions outside school that may affect pupils or the school community. It should be read with the staff code of conduct, low-level concerns procedure, safer-recruitment policy, behaviour and anti-bullying policies, online-safety and acceptable-use rules, mobile-phone policy, attendance policy, boarding policies, RSHE policy, Prevent risk assessment, complaints and whistleblowing procedures.

Core principles

- **Act immediately.** A member of staff should never assume another person will take action.
- **Never require certainty.** A concern, a change in behaviour, a child's words or professional unease is enough to share.
- **Do not investigate.** Listen and clarify only enough to establish what the child is saying and what immediate protection is needed.
- **Share proportionately.** Data protection law permits necessary, relevant and proportionate sharing for safeguarding.
- **Respect the child's voice.** Explain what will happen, seek views and take account of communication needs, while being clear that adults may need to act.
- **Challenge delay.** Use escalation routes where response or progress is inadequate.

2. Statutory and local framework

The policy is informed by the law and guidance in force or due to take effect for the 2026–27 academic year. It must be interpreted alongside current statutory guidance; where the law or guidance changes, the current requirement prevails and this policy will be reviewed promptly.

- Keeping Children Safe in Education 2026 (KCSIE 2026), effective Sept 1, 2026
- Working Together to Safeguard Children 2026.
- Children Acts 1989 and 2004; section 157 of the Education Act 2002; Independent School Standards and National Minimum Standards for Boarding Schools.

Children's Wellbeing and Schools Act 2026, including the temporary-accommodation notification duty commencing on Sept 30, 2026, together with relevant commencement regulations.

- Equality Act 2010 and the public-law principles relevant to non-discrimination, reasonable adjustments and children's rights; Human Rights Act 1998 where applicable.
- UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.
- Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance 2023.
- Domestic Abuse Act 2021; Female Genital Mutilation Act 2003; Forced Marriage law; Modern Slavery Act 2015; Voyeurism legislation and relevant criminal law.
- Statutory RSHE guidance effective from September 2026; statutory mobile-phone guidance effective from September 2026; statutory school-attendance guidance.
- Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, thresholds, escalation arrangements and safeguarding-in-education guidance.

MARTYN'S LAW

The Terrorism (Protection of Premises) Act 2025 received Royal Assent but its substantive duties are not treated as in force until formally commenced. Earlscliffe will continue proportionate preparedness and security planning and will update arrangements when the commencement timetable and regulations require it.

3. Safeguarding culture, equality and the child's voice

The school promotes a culture in which safeguarding is part of ordinary professional practice, concerns are welcomed, uncertainty is discussed and adults can report without fear of retaliation. Leaders model openness, curiosity, respectful challenge and timely action. Safeguarding is not confined to a single referral: it includes what pupils experience in lessons, boarding, peer relationships, online spaces, activities and the wider community.

Abuse, neglect and exploitation can happen in any family or community and can be perpetrated by adults or children, known or unknown, face to face or online. The school avoids assumptions based on social background, culture, faith, ethnicity, sex, sexual orientation, disability, gender presentation or achievement. Staff consider how racism, misogyny, misandry, homophobia, biphobia, transphobia, ableism and other discrimination can both cause harm and make disclosure less likely.

Hearing and supporting children

- Provide safe, accessible and age-appropriate ways to seek help, including named adults, tutorial and boarding routes, health and wellbeing support and private reporting options.
- Use communication approaches that reflect language, disability, neurodivergence, trauma and the possibility that a child may not recognise an experience as abusive.
- Take seriously partial, delayed, indirect or withdrawn disclosures. Trauma may affect chronology, detail and recall.
- Explain decisions and next steps in language the child can understand, revisit the explanation and record the child's wishes and feelings.
- Do not make access to protection depend on the child making a formal complaint, repeating their account or identifying a perpetrator.

4. Governance, leadership and accountability

Proprietor and governing body

The proprietor and governing body ensure that safeguarding arrangements comply with statutory duties and local multi-agency procedures. They retain strategic oversight while respecting the DSL's operational authority and the confidentiality of individual cases.

- Approve and review this policy at least annually, confirm its effectiveness and make it available to parents and the public.
- Appoint a suitably senior DSL, deputies, a board-level safeguarding lead and a trained case manager for allegations; ensure the DSL has time, authority, training, resources and access to supervision.
- Ensure all staff read full Part One of KCSIE 2026 and receive role-appropriate induction and updates. The Part One overview is a supplement, not an alternative.
- Oversee safer recruitment, single central record compliance, checks on governors and proprietors, and the changed regulated-activity position for relevant volunteers from September 2026.
- Ensure online-safety governance covers the content, contact, conduct and commerce risks, including generative AI, and that filtering and monitoring are reviewed at least once each academic year.
- Ensure arrangements for boarding, children placed in alternative provision, school-hosted activities and third-party use of premises meet safeguarding expectations.
- Review themes and learning from referrals, allegations, low-level concerns, attendance, exclusions, bullying, online incidents and pupil voice without exposing unnecessary personal information.

Headteacher

Dr N Robinson is accountable for implementing this policy day to day, ensuring a safe culture, allocating resources and responding as case manager to allegations or low-level concerns about adults, except where the concern relates to the Headteacher. The Headteacher ensures that safeguarding is integrated with behaviour, attendance, boarding, curriculum, recruitment, premises, health and safety and staff management.

5. Roles and responsibilities

Designated Safeguarding Lead

Mr L Connolly, Deputy Headteacher, is the Designated Safeguarding Lead. The DSL has lead responsibility for safeguarding and child protection, including online safety and understanding the school's filtering and monitoring systems. The responsibility remains with the DSL even where tasks are delegated to trained deputies.

- Advise staff, assess concerns, make and monitor referrals, convene a coordinated school response and ensure the child's wishes and welfare are central.
- Maintain access and cover arrangements, including a confidential safeguarding mailbox, boarding and out-of-hours activity.
- Liaise with children's social care, police, LADO, Prevent partners, health, education and other agencies; support statutory assessments and contribute to multi-agency plans.
- Maintain secure, contemporaneous child-protection records and oversee transfer of files when pupils move.
- Lead training, safeguarding induction and updates; keep knowledge current; report themes, risks and assurance information to senior leaders and governance.
- Promote educational outcomes for children with social workers and other vulnerable pupils, working with the designated teacher and relevant pastoral and boarding staff.
- Review the school's approach to online safety, filtering and monitoring, generative AI and mobile-phone controls with the senior responsible person and IT support.

Deputy DSLs

Deputy DSLs are trained to the same standard and may carry out delegated functions. At least one trained safeguarding lead must be contactable whenever the school is operating or responsible for children. Deputies record actions and decisions promptly and keep the DSL informed. The DSL's lead responsibility cannot be delegated away.

All staff and adults

- Read this policy, the staff code of conduct, behaviour policy, attendance arrangements, online-safety / acceptable-use rules and full Part One of KCSIE 2026; confirm understanding.
- Know the identity and contact routes of the DSL and deputies, the early / Family Help process and the direct referral and emergency routes.
- Be alert to abuse, neglect, exploitation, harmful behaviour, mental-health indicators, online risk, attendance patterns and contextual risks; maintain professional curiosity.
- Act on concerns immediately, make an accurate record and follow up if there is no satisfactory response.
- Maintain professional boundaries, report low-level concerns and allegations, and use whistleblowing routes where needed.

- Do not use personal devices or accounts to communicate with pupils except within expressly authorised school arrangements.

6. Recognising concerns and additional vulnerability

Staff do not need to diagnose abuse or establish proof. They notice patterns, changes, injuries, behaviours, words, attendance, relationships and online experiences, and share what they know. A single indicator may be significant. Several apparently minor events may reveal cumulative harm.

Children who may face additional barriers

Any child can need protection. Staff give particular attention to children whose circumstances may increase exposure to harm or create barriers to recognition, disclosure or support, including:

- children with SEND, disabilities, medical conditions, communication differences or mental-health needs;
- children with a social worker, looked-after and previously looked-after children, children in kinship care, adopted children and children in private fostering arrangements;
- young carers, pregnant or parenting pupils, children affected by parental mental ill health, substance misuse, domestic abuse, imprisonment, homelessness or temporary accommodation;
- children missing education, repeatedly absent, subject to part-time timetables, frequent removal, suspension or risk of permanent exclusion, or attending alternative provision;
- children who are lesbian, gay or bisexual, questioning sexual orientation or gender, or perceived to be different; support is child-centred, case by case and consistent with KCSIE, safeguarding duties and the Equality Act;
- international pupils, children living away from home, boarders, children with limited local support, children who have recently arrived in the UK or who may be trafficked or privately fostered;
- children exposed to discrimination, poverty, community violence, criminal or sexual exploitation, modern slavery, financial exploitation, radicalisation or harmful online environments.

Mental health, young carers and medical conditions

Mental-health difficulties may be an indicator or consequence of abuse, neglect or exploitation. Staff share the safeguarding concern rather than attempting diagnosis, respond immediately to acute risk, and coordinate pastoral, health, family and statutory support. A child who cares for a family member may carry hidden practical or emotional burdens that affect attendance, wellbeing, sleep and safety; the school seeks the child's views and considers a young-carer assessment and coordinated support.

Children with medical conditions or allergies may face additional safeguarding risk where essential information, treatment or medication is withheld, inconsistent or used to control them. Staff follow the Supporting Pupils with Medical Conditions and allergy arrangements while reporting any concern about neglect, fabricated or induced illness, exploitation or deliberate failure to meet health needs.

Children questioning their gender and requests for social transition

Questioning gender is not itself a safeguarding risk. A child may, however, experience bullying, discrimination, family conflict or complex mental-health and psychosocial needs. Staff listen respectfully, avoid stereotypes, remain professionally curious about the child's full circumstances and act on any safeguarding concern. The school does not initiate social transition.

Where a child or parent asks the school to support a change associated with social transition, the Headteacher and DSL lead a careful, documented, individual assessment of welfare and best interests, safeguarding risk, the child's wishes, the impact on other children, and the school's duties under equality and human-rights law.

Parents or carers are involved unless there is a significant safeguarding reason not to do so, in which case children's social care advice is sought. Staff do not implement changes independently before the school has reached and recorded a decision.

The school maintains the sex-specific safeguards required by KCSIE 2026 and premises law. Pupils are not permitted to use toilets, changing rooms, boarding or overnight accommodation designated for the opposite biological sex. A suitable individual alternative is arranged where needed to protect safety, privacy and dignity. Where a sport is designated single-sex because this is necessary for safety, pupils do not participate in the version designated for the opposite biological sex. Bullying, harassment and deliberate humiliation are never tolerated.

MENTAL HEALTH

Mental-health difficulties can be a sign or consequence of abuse, neglect or exploitation. Staff record and share the safeguarding concern; they do not attempt diagnosis. Immediate risk of suicide or serious self-harm requires emergency action.

7. Responding to a concern or disclosure

If a child speaks to you

1. **Listen.** Give the child time and your attention. Stay calm and take the account seriously.
2. **Reassure.** Say they have done the right thing by telling you and that the harm is not their fault.
3. **Be honest about privacy.** Explain that you cannot promise secrecy and will share only with people who need to help keep them safe.
4. **Clarify only what is necessary.** Use open prompts such as "Tell me what happened" or "What happened next?". Do not ask leading, repeated or investigative questions.
5. **Check immediate safety.** Establish whether the child needs emergency medical care, is in immediate danger or fears going home or returning to accommodation.
6. **Record and report.** Write the child's own words where possible, distinguish fact from opinion, record date, time, setting and people present, then pass the concern to the DSL without delay.
7. **Preserve evidence.** Do not confront an alleged perpetrator or access, copy, forward or search for illegal images. Follow DSL / police advice about devices and other evidence.
8. **Continue support.** Do not treat referral as the end of the school's responsibility. Agree safe contact, practical support and how the child will be updated.

Action by the DSL

The DSL considers immediate risk, the child's needs and wishes, siblings and other children, contextual risk, whether parents can safely be involved, and whether the concern requires emergency action, a children's social care referral, police contact, Prevent referral, Family Help, school support or continued monitoring. The DSL records the rationale, action, agency response, outcome and review point.

Parents or carers will normally be informed and involved, unless doing so could place a child or another person at increased risk, prejudice a criminal or child-protection inquiry, lead to evidence being destroyed, or conflict with agency advice. Staff must not contact parents about a disclosure without checking with the DSL.

8. Recording, child-protection files and transfer

All safeguarding records are made promptly on CPOMS, the school's secure safeguarding system. Records are factual, dated, timed and attributable; they include the concern, the child's words, action taken, decisions and reasons, consultation, referrals, responses, desired outcomes and follow-up. Staff do not erase original information: corrections are traceable.

- Use a body map only to record the site and description of an injury. Do not photograph a child's injury on a personal device or ask a child to remove clothing beyond what is ordinary and necessary for immediate care.
- Safeguarding records are separate from the general education record, access-controlled and retained in line with legal and sector retention requirements.
- The DSL regularly audits chronology, actions, unresolved risks, siblings, attendance, peer and contextual links, and whether the child has been updated.
- When a child moves school, the original child-protection file is transferred securely, separately from the main file, as soon as possible and ordinarily within five school days. Receipt is confirmed. Relevant safeguarding information may need to be shared in advance to support safe transition.
- The school keeps a copy only where necessary for an ongoing purpose or legal requirement, and records what was transferred, when, how and to whom.

9. Family Help, referrals, escalation and professional challenge

Family Help and statutory intervention

In line with Working Together 2026, the school distinguishes universal services and community-based early help from targeted early help delivered through Family Help. Family Help brings together targeted early help and support for children in need under section 17 so that families experience a more seamless offer, consistent practitioner relationships and a coordinated plan. The school identifies needs early, works with children and families, and contributes to assessment, planning and review. A suitably qualified non-social-work lead practitioner may lead work up to and including section 17 where local protocols permit. Consent and engagement are sought where appropriate, but lack of consent does not prevent lawful information sharing or referral where a child may be at risk or statutory intervention may be required.

The level of help is reviewed against progress and risk. If needs are not improving, risk increases, a family disengages or information suggests significant harm, the DSL considers escalation or direct referral rather than allowing a support plan to drift. The school contributes fully to multi-agency assessment, strategy discussions, child-in-need and child-protection planning and records professional challenge where the response is inadequate.

Where there is reasonable cause to suspect significant harm, or a child may need protection or statutory assessment, the DSL or any member of staff may refer directly to Kent Integrated Children's Services. The referrer follows up if no acknowledgement or outcome is received and records the result. Urgent danger is reported to police and children's social care without delay.

Escalation and challenge

Professionals are expected to challenge decisions respectfully where they believe risk remains. The DSL uses the KSCMP escalation procedure, records the points of disagreement and seeks resolution at the next management level without allowing escalation to delay immediate protection. The child and family are kept informed where safe and appropriate.

10. Confidentiality, information sharing and data protection

Safeguarding information is confidential, but not secret. The school shares information lawfully, securely and proportionately when necessary to protect a child or support coordinated care. The UK GDPR and Data Protection Act 2018 do not prevent safeguarding sharing; the Data (Use and Access) Act 2025 is also considered where relevant.

- Identify a clear safeguarding purpose and share information that is relevant, accurate, adequate, timely and no more than necessary.

Before sharing or deciding not to share, staff assess the possible harm arising from each option. They consider relevance to the current risk, what the recipient genuinely needs to know, whether the information is clearly presented and appropriately contextualised, the child's wishes and the urgency of protection. Uncertainty is discussed with the DSL or data-protection lead, but advice-seeking must not delay necessary action.

- Seek consent when appropriate, but do not seek it where that could place someone at risk, cause delay, prejudice an investigation or where another lawful basis permits sharing.
- Record the decision to share or not share, the lawful and professional rationale, what was shared, with whom and any restrictions.
- Use secure channels and verify identity. Personal email, informal messaging and personal cloud storage must not be used for safeguarding records.
- Ensure the child and family understand how information may be used, unless this is unsafe or impracticable.
- Do not allow fear of breaching data protection to create inaction. Seek advice from the DSL or data-protection lead where needed, without delaying protection.

11. Child-on-child abuse and harmful sexual behaviour

Child-on-child abuse can occur inside or outside school and online. It includes bullying and prejudice-based harassment, abuse within intimate relationships, physical abuse, sexual violence and harassment, upskirting, coercive or non-consensual sharing of nude or semi-nude images, AI-generated or manipulated sexual imagery, initiation or hazing, exploitation, stalking and abuse connected with gangs or group activity. There is a continuum from developmentally expected behaviour to inappropriate, problematic, abusive and violent behaviour.

NEVER DISMISS IT AS BANTER

The absence of a report does not mean abuse is not happening. Language or behaviour that sexualises, humiliates, controls or discriminates is challenged and recorded. Victims are believed and protected; children who have harmed are assessed and supported without minimising risk or using language that fixes identity.

School response

- Take immediate steps to protect the child, consider medical and forensic needs and make separate, safe arrangements for the children involved.
- Record the child's own language and avoid forcing repeated accounts. Do not promise a particular outcome.
- Complete a proportionate risk and needs assessment covering the victim, the child alleged to have caused harm, other children, online and contextual risks, timetable, boarding, transport and contact outside school.
- Consider children's social care and police referral. Where sexual violence is reported, police advice is normally sought and action must not contaminate evidence or obstruct an investigation.
- Do not use mediation, restorative practice or face-to-face apology where it could blame, intimidate or re-traumatise a victim.
- Apply discipline and safeguarding as related but separate processes. Support continues regardless of whether a criminal threshold is met or a complaint is withdrawn.
- Review plans regularly and address wider culture, locations, peer groups and online spaces that enabled or normalised harm.

The child alleged to have caused harm may also have unmet safeguarding, trauma, SEND, mental-health or exploitation needs. The school avoids language that fixes a child's identity, assesses developmental and contextual factors, provides proportionate support and refers to statutory services where indicated, while maintaining firm boundaries and protection for the victim and other children.

Nude or semi-nude images and synthetic content

Every incident involving a child's nude or semi-nude image requires a safeguarding response, including content described as consensual, created by generative AI or manipulated from an ordinary image. Staff must not view, copy, print, forward, save or ask a child to send the image. The DSL follows current UKCIS and KCSIE guidance and seeks police or specialist advice where there is evidence of coercion, exploitation, adult involvement, extreme content, a large age or power imbalance, persistent sharing or immediate risk.

12. Online safety, generative AI, mobile phones and filtering

Online safety is integral to safeguarding and curriculum, technology, behaviour and premises management. Earlscliffe addresses the four overlapping areas of risk: content, contact, conduct and commerce. Controls balance protection with education, age, proportionality and the need to avoid unreasonable restrictions on access to information and support.

Generative AI and emerging technology

- Risk assessments and acceptable-use rules cover chatbots, image and voice generation, deepfakes, automated companion systems, grooming through simulated contact, data leakage, bias, misinformation and sexualised synthetic content.
- Pupils and staff may use approved AI services only within school rules, age restrictions, privacy arrangements and educational oversight. Personal or special-category data, safeguarding records and identifiable pupil work are not entered into unapproved tools.
- Creating, requesting, possessing or sharing sexualised synthetic images of children is treated as a safeguarding concern and may be a criminal matter even where no real image was used.
- Teaching develops critical evaluation, consent, privacy, source checking, healthy relationships and how to report harmful or deceptive content.

Mobile phones and personal devices

From September 2026 the school follows statutory mobile-phone guidance and maintains a phone-free-by-default school day, subject to the school's published policy and reasonable, individual exceptions for medical, disability, safeguarding or other compelling needs. Boarding arrangements may provide carefully controlled access outside the school day. Staff model the rules and use school-authorised systems for pupil communication.

Filtering and monitoring

- The governing body assigns a senior responsible person. The DSL, IT support and relevant leaders understand their roles, the systems used, their limitations and escalation routes.
- Filtering and monitoring provision is reviewed at least once each academic year and whenever there is significant technological, premises or risk change. Checks cover all school-managed and internet-connected devices and all relevant locations, including boarding.
- The review tests whether controls are proportionate, effective and consistent with KCSIE and the DfE filtering and monitoring standards. Checks and actions are recorded.
- Alerts are triaged promptly by trained people. Monitoring is not a substitute for staff supervision, pupil education, reporting routes or professional judgement.
- Incidents, near misses, bypass methods and pupil voice inform continuous improvement. The school considers generative-AI traffic, encrypted services, VPNs, personal hotspots and unmanaged devices.

13. Attendance, missing education, alternative provision, work experience and homestay

Attendance and children missing education

Absence can be an early indicator of abuse, exploitation, mental ill health, bullying, unsafe transport, domestic abuse, homelessness, trafficking or unmet SEND needs. Staff look beyond attendance percentages to patterns, unexplained absence, repeated late arrival, changes after weekends or holidays, withdrawal from boarding and failed contact. Attendance and safeguarding teams share information promptly.

- Reasonable efforts are made immediately to establish a child's whereabouts and safety. Urgency increases where there are known safeguarding risks or unexpected absence from boarding.
- The school follows statutory attendance guidance and Kent children-missing-education procedures, including required notifications when pupils join or leave at non-standard points.
- Part-time timetables are exceptional, time-limited, reviewed and never used to manage behaviour or mask unmet need. Safeguarding, education and reintegration plans are explicit.
- Repeated classroom removal, suspension, risk of exclusion or unexplained withdrawal trigger consideration of safeguarding and additional support.

Alternative provision

Earlscliffe remains responsible for the safeguarding and educational welfare of a pupil placed with an alternative provider. The school completes due diligence before placement, obtains and records the required identity and safer-recruitment assurance, agrees attendance and concern-reporting arrangements, visits and reviews the placement, and acts immediately on absence or risk. A placement is not used where safeguarding arrangements are inadequate.

Before and during placement, Earlscliffe obtains written confirmation that the provider has completed the safeguarding checks the school would otherwise carry out. The provider must notify Earlscliffe of staff or arrangement changes that may put the child at risk. The school keeps the placement under review through attendance data, direct pupil contact, visits and timely information sharing; commissioning does not transfer accountability.

Work experience

Work-experience arrangements are risk assessed. Where an adult will teach, train, instruct, supervise or care for a child frequently (once a week or more), on more than three days in a 30-day period, or overnight, the DSL and safer-recruitment lead determine whether the activity is regulated and whether the person is eligible for an enhanced DBS check with children's barred-list information. The school observes the distinct legal restriction on requesting barred-list information for supervisors of 16- and 17-year-olds and seeks specialist advice where necessary.

Homestay and exchange arrangements

Where Earlscliffe arranges a visiting child's care and accommodation in a UK host family and can terminate the arrangement, the responsible hosting adults are in regulated activity for the stay. The school obtains an enhanced DBS certificate with children's barred-list information and considers whether checks are also appropriate for any other household member aged 16 or over. Suitability assessment includes identity, household composition, sleeping arrangements, transport, emergency arrangements, references, home visits where appropriate and the child's ability to report privately.

For homestays abroad, DBS information is not available: the school liaises with the partner institution, agrees equivalent suitability and welfare arrangements, informs parents and ensures pupils know who to contact at any time if they feel unsafe or uncomfortable. A homestay arranged privately by a parent or pupil is not a school regulated-activity arrangement, but any welfare concern is still acted upon. An arrangement lasting 28 days or more may constitute private fostering and must be notified to the local authority where the statutory definition is met.



14. Boarding, residential life and international pupils

Safeguarding applies continuously to boarding. Boarding staff understand the additional risks created by living away from home, private spaces, night-time arrangements, peer dynamics, online access, isolation and limited family support. A trained safeguarding lead is contactable when boarders are in residence, and children know how to seek help privately, including from an independent person and external services.

- Accommodation, supervision, rooming, access controls, health care, missing-pupil response and intimate / personal care arrangements protect safety, dignity and privacy.
- Children must not share overnight accommodation with a child of the opposite biological sex. Where a child asks for different arrangements, the school makes an individual alternative arrangement that protects safety, dignity and privacy, in line with KCSIE 2026 and the National Minimum Standards.
- Staff respond to peer abuse in boarding with the same threshold and urgency as harm during the school day; house sanctions do not replace safeguarding assessment.
- Online filtering, monitoring and device expectations extend to boarding networks and relevant school-controlled devices, with age-appropriate access arrangements outside teaching time.
- International pupils receive clear explanations of UK safeguarding law, consent, reporting routes and emergency help. Language, visa, guardianship and cultural factors are never allowed to obscure the child's welfare.
- If a pupil under 16 (or under 18 if disabled) lives for 28 days or more with someone who is not a parent, close relative or person with parental responsibility, the DSL considers whether this is private fostering and ensures the local authority is notified.

15. Safer recruitment, the single central record, visitors, contractors and use of premises

Safer recruitment

Recruitment follows KCSIE 2026 and the school safer-recruitment procedure. At least one appropriately trained person participates in recruitment. The process includes a clear safeguarding statement, structured scrutiny of application and employment history, appropriate references, identity and right-to-work checks, qualification and prohibition checks, overseas checks where relevant, DBS and barred-list checks where legally available, online search considerations, interview exploration and documented decision making. No person starts unsupervised work until required checks and risk decisions are complete.

Single central record

Earlscliffe maintains a single central record for the people and checks required by KCSIE and the Independent School Standards, including staff, supply and agency workers, relevant trainee teachers and the required proprietor information. The record shows whether each applicable check was completed, the date of the check, and the identity of the person who checked the evidence. It covers identity, enhanced DBS and children's barred-list information where applicable, prohibition from teaching, qualifications, right to work, overseas checks and section 128 management checks where required. The safer-recruitment lead keeps the record contemporaneous and retains supporting assurance from agencies and contractors. Fee-funded trainee teachers are recorded as non-statutory information where the school chooses to do so, with written confirmation of the provider's checks retained.

The Headteacher, Deputy Headteacher, and board-level safeguarding lead sample the record and underlying evidence regularly; omissions are escalated and resolved before unsupervised deployment.

Volunteers and the 2026 regulated-activity change

From Sept 1, 2026 - the former supervision exemption no longer removes regulated-activity status from a volunteer who regularly teaches, trains, instructs, supervises or cares for children. A volunteer carrying out that work frequently (once a week or more), on more than three days in a 30-day period, or overnight is treated as in regulated activity and is subject to an enhanced DBS check including children's barred-list information. Existing volunteers in that category must be reviewed and checked before continuing. For volunteers outside regulated activity, the school records a written risk assessment and obtains the level of check legally available and appropriate. An unchecked volunteer is never left unsupervised with children.

Agency staff, contractors, visitors and speakers

- The school obtains written confirmation of required checks from agencies and contractors and verifies identity on arrival. Any information disclosed on a DBS certificate is considered before deployment.
- Visiting professionals, speakers and contractors are risk assessed, briefed, identified and supervised proportionately. A visitor badge is not a safeguarding check.
- Adults do not receive unsupervised access to children or sensitive pupil information unless their role, checks and arrangements authorise it.
- Third-party hiring or use of premises includes a safeguarding agreement, named contacts, emergency and allegation routes, and assurance that activity for children follows current safeguarding guidance. Concerns arising during an external activity are handled under school and local procedures, including referral to LADO where relevant.

Premises, sport, changing and residential arrangements are reviewed for privacy, supervision, accessibility, physical safety and the sex-specific requirements in KCSIE 2026. External providers must report safeguarding incidents to the school immediately. Where an allegation concerns an adult working in an activity on school premises, the school follows its allegation procedure and contacts LADO / LESAS as appropriate, even where the provider also has its own process.

16. Allegations, low-level concerns and whistleblowing

Allegations that may meet the harm threshold

An allegation may meet the harm threshold where an adult has behaved in a way that harmed or may have harmed a child; may have committed a criminal offence against or related to a child; behaved towards a child in a way indicating they may pose a risk of harm; or behaved in or outside work in a way that may indicate they are unsuitable to work with children. The procedure applies to staff, supply staff, volunteers, contractors, governors and other adults working for or on behalf of the school, including trainee teachers.

1. Report immediately to the Deputy Headteacher/DSL or Headteacher, without alerting the subject of the allegation.
2. If the allegation concerns the Headteacher, report to the board-level safeguarding lead / proprietor representative. If it concerns that person, contact Kent LADO directly.
3. The case manager makes only the preliminary enquiries needed to establish whether the allegation may meet the threshold and contacts LADO promptly, ordinarily within one working day, before internal investigation or disciplinary action.

4. Immediate safety, welfare, support, confidentiality, preservation of evidence, suspension alternatives and communication are considered in consultation with LADO and other agencies.
5. Supply or third-party status does not transfer away the school's responsibility. The school and employer agree leadership, information sharing and action.

Low-level concerns

A low-level concern is any concern that an adult may have acted inconsistently with the staff code of conduct, including conduct outside work, even if it does not appear to meet the harm threshold. Examples include over-familiarity, favouritism, inappropriate communication, humiliating language, one-to-one boundary breaches, secrecy or use of personal devices. All concerns are recorded and reviewed for patterns. The Headteacher and Deputy Headteacher/DSL decides next steps, consults LADO where the threshold is unclear, and ensures learning and proportionate action.

Whistleblowing

Adults are expected to report unsafe practice, poor safeguarding response, concealment or retaliation. No person will suffer detriment for raising a genuine concern in good faith. Where internal routes cannot be used or have failed, staff may contact the NSPCC Whistleblowing Advice Line or an appropriate regulator or statutory agency.

17. Prevent, curriculum, RSHE and a protective education

Prevent duty

The school assesses the risk of pupils being drawn into terrorism or extremist ideologies and provides proportionate training, curriculum, pastoral support and online-safety controls. Staff notice concerning changes, grievances, isolation, exposure to propaganda, closed online groups, hateful narratives or attempts to influence others, while avoiding stereotyping or criminalising legitimate belief and debate. Concerns are shared with the DSL. Immediate danger is reported to police; non-urgent advice and referrals use Kent Prevent routes.

The DSL uses the current Kent and Medway notice-check-share and referral process. Prevent referrals and relevant information are submitted to the police through the published route and recorded. Consent is required before Channel support is provided, but it is not a precondition for making a lawful Prevent referral or sharing information necessary to assess risk. Mainstream safeguarding and children's social care action continue alongside Prevent where required.

Curriculum and relationships education

A planned, inclusive and age-appropriate curriculum helps pupils understand healthy and respectful relationships, consent, boundaries, privacy, equality, discrimination, domestic and teenage relationship abuse, coercive control, sexual harassment, online risk, generative AI, image sharing, financial and criminal exploitation, radicalisation, mental wellbeing and how to seek help. From September 2026, RSHE planning is reviewed against the revised statutory guidance. Teaching is responsive to local and school evidence and does not rely on one-off events.

Staff manage disclosures arising from lessons sensitively and follow this policy. Curriculum resources and visiting speakers are quality assured. Parents are informed and engaged within the statutory framework, while a child's right to safety and the school's safeguarding duties remain paramount.

18. Searches, confiscation, reasonable force and images

Searches and confiscation

Searches and confiscation follow the current DfE guidance, school behaviour policy and safeguarding principles. The welfare of the child, SEND, trauma, sex, privacy and the possibility that an item is evidence of abuse or a criminal offence are considered. Where a device may contain an indecent or illegal image of a child, staff do not view, copy or forward content. The DSL seeks police or specialist advice. A device may be isolated or confiscated only where proportionate and safe; setting it to flight mode is not an automatic rule and must not risk loss or remote destruction of evidence.

Reasonable force

Reasonable force is used only where lawful, necessary and proportionate, using no more force than is necessary for the least amount of time. Staff prioritise prevention and de-escalation and consider communication, disability, SEND, medical needs, trauma and the Equality Act duty to make reasonable adjustments. Individual positive-support plans are used where they can reduce foreseeable risk. Incidents are recorded, reviewed and shared with parents unless this would create risk. Any force that causes concern about harm or adult conduct is referred under the safeguarding or allegation procedure.

Photography, CCTV and personal devices

Images of pupils are created, stored and shared only through authorised systems and for a defined purpose. Consent, privacy notices and safeguarding risk are respected. Personal devices must not be used for pupil images or safeguarding evidence. CCTV is access controlled and disclosed only lawfully. Suspected voyeurism, upskirting, image-based abuse or covert recording is treated as a safeguarding concern and may require police referral.

19. Training, quality assurance and review

Training

- All staff receive safeguarding and child-protection induction before or at the start of work, including the staff code, allegation and low-level concern routes, behaviour, attendance, online safety, mobile phones, whistleblowing and the identity of the DSL team.
- All staff read full Part One of KCSIE 2026 and receive safeguarding updates at least annually, with regular briefings and practice activity across the year. Understanding is checked, not assumed.
- The DSL and deputies complete role-specific training at least every two years and refresh knowledge and skills regularly. Boarding, recruitment, online safety, attendance, health and premises roles receive specialist training relevant to their responsibilities.
- Governors and proprietors receive training sufficient to provide strategic challenge and assurance, including online safety, filtering and monitoring, safer recruitment and allegations.

Quality assurance

The Deputy Headteacher/DSL and Headteacher maintain an annual safeguarding assurance cycle. It includes case-file audit, referral and escalation review, pupil and parent voice, staff knowledge checks, single central record and recruitment sampling, boarding and premises review, attendance and exclusion analysis, online filtering and monitoring tests, low-level concern and allegation themes, curriculum mapping, external-provider assurance and completion of actions. Findings are reported to the board-level safeguarding lead and governing body with timescales and named owners.

Policy review

This policy is reviewed at least annually and sooner after a serious incident, statutory or local change, learning review, audit finding or material change in school operation. Approval confirms that names and contact routes are current, KCSIE publication changes have been checked, staff have received the policy and implementation actions have been completed.



Earlscliffe



Appendix A - Definitions and indicators of abuse

Indicators are not a checklist and may have innocent explanations. Staff share concerns rather than making a diagnosis. Abuse can involve inflicting harm or failing to prevent harm, and may occur wholly online or through technology that facilitates offline harm.

Physical abuse

Deliberate physical harm, including hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing injury. Fabricated or induced illness may also involve physical abuse.

Emotional abuse

Persistent treatment that seriously harms emotional development, including humiliation, threats, rejection, exploitation, coercion, exposure to domestic abuse, developmentally inappropriate expectations, silencing or bullying. It is present in all forms of abuse but can occur alone.

Sexual abuse

Forcing, coercing or enticing a child into sexual activity, contact or non-contact, whether or not the child understands or appears to consent. It includes online abuse, image creation or sharing, grooming, exploitation and abuse by other children as well as adults.

Neglect

Persistent failure to meet basic physical or psychological needs in a way likely to impair health or development, including food, clothing, shelter, supervision, medical care, education and emotional responsiveness. Neglect may begin in pregnancy.

Exploitation

Using power, status, affection, debt, fear, money, gifts, technology or basic needs to obtain sexual, criminal, financial, labour or other benefit from a child. A child may appear to cooperate and is still a victim.

Possible indicators

- unexplained or repeated injuries, inconsistent explanations, untreated health needs or frequent presentation for care;
- marked changes in mood, sleep, eating, achievement, attendance, relationships, appearance, hygiene or use of money and devices;
- fear of a person or place, reluctance to go home or to boarding, running away, missing episodes or sudden travel;
- sexualised knowledge or behaviour inconsistent with development, pain, pregnancy, sexually transmitted infection or concerning image sharing;
- hunger, poor clothing, lack of supervision, exhaustion, being left to care for others or persistent unmet medical / educational needs;
- new unexplained possessions, debt, multiple phones, older associates, hotel or taxi use, secret accounts, threats, controlling relationships or unexplained cash transfers;
- self-harm, suicidal ideation, substance use, dissociation, aggression, withdrawal or repeated risk taking.

Appendix B - Specific safeguarding issues

Domestic and teenage relationship abuse

Children can be victims in their own intimate relationships or be harmed by abuse between adults at home. Harm may be physical, sexual, emotional, economic, coercive or controlling and may include stalking and technology-facilitated abuse. Operation Encompass information is treated as a prompt for discreet support and risk assessment, not as the sole evidence required to act.

Child sexual exploitation

A form of sexual abuse in which a child is manipulated, coerced or deceived into sexual activity in exchange for something they need or want, or for the advantage of another person. Apparent consent, gifts or a relationship do not remove exploitation.

Child criminal and financial exploitation

Children may be coerced into carrying drugs, weapons or money, opening accounts, moving funds, shoplifting, fraud or other crime. County lines can involve debt, violence, sexual abuse, missing episodes and use of accommodation. Children are protected as victims even where they have committed offences.

Modern slavery and trafficking

Trafficking does not require international travel. A child may be moved, harboured or controlled for sexual, criminal, labour or domestic exploitation. Immigration status or fear of authorities can inhibit disclosure.

Serious violence and weapon risk

Warning signs may include increased absence, decline in performance, new older associates, unexplained injuries, multiple phones, gifts, debt, threats or significant changes in wellbeing. Immediate weapon risk is reported to police and children's social care.

Female genital mutilation

FGM is illegal and a form of child abuse. A teacher who, in the course of professional duties, discovers that FGM appears to have been carried out on a girl under 18 must report this personally to police under the mandatory reporting duty, normally via 101, while also informing the DSL. Suspected risk follows normal safeguarding referral routes.

Forced marriage and honour-based abuse

Forced marriage is illegal and differs from an arranged marriage because free and full consent is absent. Honour-based abuse may include coercion, threats, isolation, violence, FGM and murder. Staff do not contact family or community members without DSL / agency advice where this may increase risk.

Radicalisation

Children may be groomed or influenced towards terrorism online or offline. Staff distinguish legitimate faith, political debate and protest from vulnerability to terrorist ideology, and act proportionately through the DSL, police or Prevent routes.

Missing and repeated absence

Going missing or persistent absence may indicate exploitation, abuse, trafficking, mental ill health, unsafe accommodation or unmet needs. The school considers what happened before, during and after an absence and what changed on return.

Homelessness and temporary accommodation

Housing instability can expose children to unsafe adults, exploitation, interrupted education, overcrowding and poor health. From Sept 30, 2026, local housing authorities must notify relevant educational institutions when a child is placed in temporary accommodation and the required consent has been given. The DSL acts promptly on any notification, updates risk and support planning and considers Family Help, statutory referral and housing pathways. A housing notification never replaces an immediate safeguarding referral where a child has been harmed or is at risk of harm.

Private fostering

A private fostering arrangement may arise when a child under 16, or under 18 if disabled, lives for 28 days or more with someone who is not a close relative or person with parental responsibility. The local authority must be notified.

Children with family members in prison

Stigma, disrupted care, poverty, trauma and exploitation risk may be present. Support is discreet, practical and coordinated.

Cybercrime and online coercion

Children may be harmed through hacking, malware, denial-of-service attacks, extortion, financially motivated sexual extortion, doxxing, scams, coercive image sharing, grooming, livestreaming, deepfakes or harmful online communities. Cyber activity may involve offences under the Computer Misuse Act 1990, but a child involved in offending may also be vulnerable, groomed or exploited. Staff preserve safety and evidence, do not access illegal content, and seek DSL, police or specialist cyber advice. Supportive diversion and education are considered alongside any criminal-justice response.

Fabricated or induced illness

A caregiver may exaggerate, fabricate or cause symptoms. Staff record observations and medical information accurately and refer concerns rather than confronting the caregiver.

Abduction and removal from the UK

Risk may arise through family disputes, forced marriage, FGM, trafficking or exploitation. Urgent concerns require police and children's social care advice; staff do not disclose plans or contact implicated adults without advice.

Child-to-parent or caregiver abuse

A child may use violence, threats, coercion, property damage or economic control within the family. Responses protect victims, assess the child's needs and avoid simple blame.

Appendix C - External contacts and referral routes

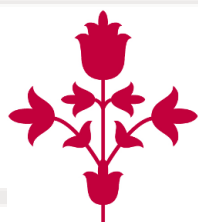
Emergency child or public in immediate danger	999
Kent children's social care urgent daytime	03000 41 11 11
Kent children's social care out of hours	03000 41 91 91
Kent professional referral	Kent Integrated Children's Services Portal - professional Front Door
Kent LADO / allegations	Referral through the Kent portal; LESAS enquiry form for advice
Police non-emergency	101
Kent Prevent advice	prevent@kent.gov.uk
Kent Prevent referral	preventreferrals@kent.police.uk
ACT Early support line	0800 011 3764
NSPCC adult helpline	0808 800 5000
NSPCC whistleblowing advice	0800 028 0285
Childline	0800 1111
Samaritans	116 123
Shout crisis text service	Text SHOUT to 85258

Referral forms, thresholds and contact details can change. The DSL checks the live KSCMP and Kent County Council pages rather than relying only on printed contact information. If an online route is unavailable and risk is urgent, telephone children's social care or police.

Appendix D — Source register and implementation checklist

Primary guidance and local procedures

- [Keeping Children Safe in Education 2026](#) effective Sept 1, 2026 - complete a final publication-day check.
- [Working Together to Safeguard Children 2026](#) current multi-agency statutory guidance.
- Children's Wellbeing and Schools Act 2026 and the 2026 commencement regulations including the temporary-accommodation notification duty commencing Sept 30, 2026.
- Regulated activity: removal of the supervision exemption DfE guidance for the change commencing Sept 1, 2026.
- Restrictive interventions, including use of reasonable force, in schools current DfE guidance reflected in KCSIE 2026.
- Kent private fostering, Front Door, LADO / LESAS and Prevent routes live local procedures and contact pages.
- [Statutory RSHE guidance](#) revised requirements apply from September 2026.
- [Mobile phones in schools](#) statutory guidance to be followed from September 2026.
- [Working together to improve school attendance](#) statutory attendance guidance, including 2026 technical updates.
- [Prevent duty guidance](#) current statutory Prevent framework.
- [Information sharing advice for safeguarding practitioners](#) lawful, proportionate information sharing.
- [National Minimum Standards for Boarding Schools](#) boarding safeguarding and welfare standards.
- [KSCMP safeguarding in education](#) Kent guidance and KCSIE 2026 toolkit.
- [Kent professional Front Door](#) children's social care referral route for professionals.
- [Kent LADO / LESAS](#) allegations, referrals and threshold advice.
- [KSCMP escalation procedure](#) use the current Kent escalation procedure where professional disagreement persists.



Earlscliffe

 Dukes
EDUCATION

Safeguarding is everyone's responsibility.



Earlscliffe
Senior School / Sixth Form

SAFEGUARDING AT EARLSCLIFFE

At Earlscliffe, the wellbeing and safety of every young person is our highest priority.

Your safety.
Your voice.
Your wellbeing.

IF SOMETHING DOES NOT FEEL RIGHT,
TELL SOMEONE.

Speak to any member of our Safeguarding Team. We are here to listen, help and support you.

No concern is too small to share.

YOUR SAFEGUARDING TEAM



DESIGNATED SAFEGUARDING LEAD

Mr L Connolly

Deputy Headteacher

If you are unsure who to speak to, you can always start here.



Dr N Robinson

DDSL
Headteacher



Ms M Cordell

DDSL
School Nurse



Ms K Taylor

DDSL
House Parent



Mr P Ludlow

SAFEGUARDING
Governor

REPORT A CONCERN

Scan the QR code to report a safeguarding concern online.
Or contact the Safeguarding Team directly:

EMAIL safeguarding@earlscliffe.co.uk

WEB www.earlscliffe.co.uk/safeguarding

TEL +44 (0)1303 253 951



SCAN TO REPORT ONLINE

SAFE | HEARD | SUPPORTED

