SUMMERHILL SCHOOL

Founded 1921

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Safeguarding and Child Protection Policy

September 2026

Safeguarding Contact Details

Proprietor

Zoë, as a proprietor and as school principal, takes *'leadership responsibility for* [the school's] *safeguarding arrangements.' (Keeping children safe in education, Sept. 2026, p.29*)

Designated Safeguarding Lead

Andrew is the Designated Safeguarding Lead (DSL) and he takes *'lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).'* He is a *'senior member of staff from the [school's] leadership team'* and *'has the appropriate status, authority, skills and experience within the school to carry out the duties of the post.'*

Further, the DSL is '*given the additional time, funding, training, resources, and support needed to carry out the role effectively.'* (*Keeping children safe in education, Sept. 2026, p.37/38).*

Deputy Designated Safeguarding Lead

Will, a deputy principal, is the Deputy Designated Safeguarding Lead (DDSL) and he is *'trained to the same standard as the designated safeguarding lead.'* (*Keeping children safe in education, Sept. 2026, p.38)*

Their **contact details** are:

Zoë – Proprietor and School Principal

Mobile: 07903938188 Email: zoe@summerhillschool.co.uk

Andrew – Designated Safeguarding Lead (DSL)

Mobile: 07730672659 Email: andrew.s@summerhillschool.co.uk

Will - Deputy Designated Safeguarding Lead (DDSL)

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Zoë, Will, and Andrew are available **at all times, day or night,** to discuss safeguarding concerns.

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Statement

Summerhill is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, and visitors to share this commitment. ***'Children'*** *means everyone under the age of 18. (Keeping children safe in education, Sept. 2026, p.8)*

We recognise that **all adults** have a full and active part to play in protecting pupils from harm. This protective role is also performed by our students who, as they grow up in the community, naturally recognise that they can make a significant contribution to safeguarding their peers. Thus, as a community of adults and students we all recognise that a child's welfare is our paramount concern. This means that we *'should consider, at all times, what is in the best interests of the child'* and take action to enable all children to have the best outcomes. *(Keeping children safe in education, Sept. 2026, p.8)*

Further, Summerhill's commitment to equality and diversity is absolute. This is reflected in its internationalism and the complete parity of status it gives to all members of the community, adults and children alike.

Definition

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 is 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 the provision of safe and effective care, and*
- *taking action to enable all children to have the best outcomes. (ibid, p.8)*

Terminology: Victims and offenders, or perpetrators.

At various places in this document, the school uses the term **'victim'**. *Keeping children safe in education (Sept. 2026, p.6)* states: '*that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way.'* The school recognises this and is '*prepared to use any term with which the individual child is most comfortable.'* The Suffolk Safeguarding Partnership (SSP) recommends the use of the term *'the child who has been harmed or the child who may have been harmed'*. However, for purposes of brevity, the school will continue to use the word 'victim'. However, this word will be in italics and in inverted commas to remind the reader of the aforementioned information.

Similarly, the school uses the term **'offender(s)'** and **'perpetrator(s)'** or '**alleged perpetrator(s)'** and *Keeping children safe in education (Sept. 2026, p.6)* states that: '*schools and colleges should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.'* The SSP recommends the use of the term *'the child who has harmed or the child who may have harmed'*. However, for purposes of brevity, the school will continue to use in this document the words 'offender' and 'perpetrator' or 'alleged perpetrator'. However, these words will be in italics and in inverted commas to remind the reader of the aforementioned information.

In any written report, the terminology used will be determined on a case-by-case basis.

Introduction

'Governing bodies and proprietors should ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND).' (*Keeping children safe in education. Sept. 2026, p.43/44)*

Safeguarding is to be found at the heart of Summerhill School; a democratic, self-governing community in which adults and students have complete equality and where a clear distinction is made between freedom and licence. Community life teaches everybody about the importance of communication, negotiation, and compromise as a means of preventing and resolving issues.

Perhaps the three most important and difficult safeguarding challenges that the school is faced with today are the issues of online safety, sex and relationships and, to a lesser extent, mental health issues including such things as self-harm and eating disorders / problems. These are issues which any school, and many families, in the United Kingdom confront. However, Summerhill is uniquely positioned to manage these issues because of its democratic nature and structures.

Abuse of any type and of any degree can only occur when there exists some sort of power differential and Summerhill goes further than any other school to reduce, as much as possible, the power differential that can exist between students, and between adults and students, and thus reduce the risk of abuse, reduce the safeguarding risk. Put simply, minimise the power differential and you automatically begin to minimise the safeguarding risk. The reduction in the power differential at Summerhill School is achieved through its unique philosophy of education. Further, this reduction in the power differential ensures that there is a high level of open, honest communication and trust between the adults and students.

'Working together to safeguard children' states that:

> *'A child-centred approach is fundamental to safeguarding and promoting the welfare of every child.'* (*Working together to safeguard children 2026, HM Government, March 2026, p.10)*

Summerhill School epitomises a child-centred approach to safeguarding. It is a place where the views of the child are constantly being expressed and heard, in particular, in the school meeting. Further, and it goes almost without saying, that where there is a safeguarding concern, the school quite naturally ensures *'the child's wishes and feelings are taken into account when determining what action to take and what services to provide.'* (*Keeping children safe in education. Sept. 2026, p.36)*

The daily life of the school is governed by the school meetings, held regularly, in which everybody has an equal vote. The meetings are used to create, confirm, and amend all the school laws which form the structure of expectations for the community of adults and students. They are laws which the children and adults feel are right and appropriate; they have the backing of the vast majority of children and adults in the community and that is why the laws are adhered to by the vast majority of the community. Further, every member of the community is aware that he or she can bring a case to the meeting to either have a particular law overturned or, alternatively, to be made an exception to a particular law.

It is our laws and our method of creating and enforcing them which could be described as our 'behaviour policy'.

The school meeting is the forum to bring the whole school's attention to any safeguarding issues and at Summerhill no form of abuse whatsoever is tolerated by the community. The meeting is considered by the school as perhaps the most effective way of raising safeguarding awareness because the issues brought to the attention of the community often involve very specific actions, for example one person being abusive to another either offline or online. The person involved (being 'brought up') is required to attend the meeting and to hear what the community has to say about their actions. Any student or staff can bring any safeguarding incident to the meeting which is both a legislative and judicial body.

Meetings are usually held twice a week, but a special meeting can be called (with the permission of the 'chairman' who is almost always a senior student) **by anybody, at any time, day or night,** if required. Should an incident require further investigation, the meeting would decide how to proceed and, in particular, who would conduct the investigation (e.g. ombudsmen, investigation committee). Thus, both students and staff are answerable to the whole community. Nobody in the school is exempt from this, and no subject is beyond the community's discussion. For example, the community has occasionally in its one-hundred-year history carried proposals in the meeting which demanded the exclusion (temporary or otherwise) of a particular child and even a member of staff.

The openness of the meeting system ensures that, for example, in a case of child-on-child abuse, the *'victim'* experiences the whole-hearted support of the community whilst the *'offender'* is not only 'fined' for his/her actions but also experiences the community's expressions of disapproval, including from his/her peer group, for his or her **actions**. This is an extremely powerful message because, unlike in an ordinary school, the message of disapproval is conveyed by the whole community and not by just one or two adults. Further, the discussion becomes an important safeguarding learning experience for everybody. All incidents discussed in the school meeting are recorded in the minutes of the meeting as are any sanctions ('fines').

A variety of 'fines' can be imposed depending on the case. The community tries to find a 'fine' that is most appropriate to the offence and to the individual *'offender'*. Further, there is an appeal process available in every meeting, that is, a time is set aside whereby a person can appeal his or her fine. In addition, it is also possible for a fine (for example, a screen ban given by a beddies officer) to be 'postponed' by an ombudsman. This means that the fine does not take effect until it has been ratified by the meeting.

It is important to note that a 'fine' is not given as a punishment but as a way in which the *'offender'* can make amends to the community for their *'offence'* to the community. Further, the 'fine' serves to give the *'victim'* a sense that justice has been done. Once the 'fine' has been 'paid', the whole community, including the *'offender'*, 'moves on' and the community disapproves very strongly of any harassment, any continuation of the argument, after the case has been brought to the meeting.

It must be emphasised that the vast majority of child-on-child abuse cases brought to the meeting are low-level harassment cases such as name calling etc. Further, it is important to note that there are very few specifically 'gender-related' incidents, where it is more likely that girls will be '*victims'* and boys '*offenders'*, which is a particular cause for concern in many schools throughout the UK.

The risk of abuse, the risk of any safeguarding incident, is further minimised by the use of elected ombudsmen (boys and girls) and beddies officers (boys and girls). Ombudsmen are

usually seven to ten older students, (though sometimes an adult stands and is elected), whose job is to respond to any immediate problems that may arise between students and, far more rarely, between students and adults. If an ombudsman is unable to successfully mediate between the two parties, then he or she will bring the matter to the meeting. It is also possible for the ombudsman to bring the matter to the meeting irrespective of whether the issue has been resolved or not and thus alert the whole community to a particular issue. Further, ombudsmen can represent students in the school meeting, if requested to do so.

Beddies Officers are older students (again, sometimes an adult stands and is elected) whose job is to put students to bed at night and/or to wake them up in the morning. Beddies officers work in pairs and there is, as a minimum, a different pair of beddies officers for each day of the week.

However, the school meeting and the use of ombudsmen and beddies officers are not the only safeguarding mechanisms employed. Safeguarding is lived out and taught in a variety of formal and informal settings. Some examples include the regular, 'formal', age-appropriate discussions on sex and relationships, online safety and on topics such as smoking, drugs and alcohol. In addition, numerous 'informal', small group, or one-on-one conversations on these and many other subjects can occur, day or night, in almost any area of the school.

The result is that the Summerhill experience leads the students to develop an inner self-confidence, which, amongst other things, empowers the students to raise safeguarding issues themselves, either publicly, or privately with appropriate individuals. There is an expectation on all community members *'to keep themselves and others safe'* and even if there is some hesitancy among certain students to initiate a discussion or express some concern, the very nature of the place (the 'panopticon'*) ensures that the adults in the community know what is happening and can, if necessary, initiate a discussion.

Stated in simple language, we all know (the adults and the students) when somebody is spending too much time on the internet. We all know when a student is doing something on the internet that might be considered unsafe. We all know when students are engaging, or are likely to engage, in an under-age sexual relationship. We all know if a student is experimenting with self-harm or is not eating very much. This knowledge enables the adults to act in a way that is appropriate to each individual circumstance.

The Summerhill experience also enables pupils, from diverse cultural backgrounds, to grow in a family environment, free from the usual social prejudices found in many other schools, in particular, gender-based prejudices. This in turn creates, throughout the school, a marked confidence and friendship between the sexes, and between all age groups. Central to this experience is the accommodation arrangements where the presence of girls on the same corridor as boys brings a greater equilibrium to the whole area and contributes significantly to the lack of gender-related safeguarding incidents. As A.S. Neill wrote: 'One sex will not grow up with any illusions or delusions about the other sex.' *('Summerhill' A.S. Neill. Pelican Books. 1968, p.62/63)*

To conclude, safeguarding at Summerhill is not an abstract, adult driven concept but something which is not only very real and robust but also something the students and adults at Summerhill actually **live** on a daily basis. Indeed, it could be argued that Summerhill is the only school in the whole of the United Kingdom where the students can actually live out the four fundamental British values. The concept of 'fundamental British values' was first coined by the *Prevent* strategy in 2011 and from September 2014 all schools were required to actively promote ***'the fundamental British values of democracy, the rule of law, individual liberty, and mutual***

respect and tolerance of those of different faiths and beliefs' **(**Prevent duty guidance, Dec 2023, p.41, para 180*).* However, the reality is that at Summerhill 'fundamental British values' have been at the core of the school's philosophy since it was founded in 1921 and thus the school has been practising these values for over one hundred years. These values are not theoretical ideas placed into the heads of students, they are instead values which they live and breathe because they are an integral part of their whole being. Thus, Summerhill educates in a way that goes far beyond the form of education described in *Keeping children safe in education (Sept. 2026):*

'Schools and colleges play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. The school/college will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school/college life. These will be underpinned by the school/college's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such a programme should be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with special educational needs and/or disabilities (SEND) and other vulnerabilities).' (Keeping children safe in education, Sept. 2026, p.44)

* For further information on the 'panopticon' in relation to Summerhill, please see *'Can Liberal Education Make a Comeback? The case of 'Relational Touch' at Summerhill School'. Ian Stronach & Heather Piper. American Educational Research Journal. March 2008. Vol 45 No. 1 pp.6-37.*

For more information on the school's 'behaviour policy', see *Summerhill Laws.*

For more information on the various school committees, see *Recognised Roles' and Committees' Duties, Responsibilities and Powers* (July 2026)

This policy is informed, first and foremost, by the educational philosophy of the school's founder, A.S. Neill, who acted 'in the best interests of the child' (ibid.) when he first started the school with '…... *one main idea:* ***to make the school fit the child*** *– instead of making the child fit the school.' ('Summerhill' A.S. Neill. Pelican Books. 1968, p.20)*

In addition, this policy is informed by a wide range of government documents, both statutory and non-statutory. They include, but are not limited to, the following:

- *Keeping children safe in education (September 2026)*
- *Disqualification under the Childcare Act 2006 (September 2018) which is incorporated in the above-named document.*
- *Working Together to Safeguard Children (March 2026)*
- *National Minimum Standards for boarding schools (May 2026)*
- *The Independent School Standards (April 2026)*
- *Guidance for safer working practice for those working with children and young people in education settings (February 2022)*
- *Information Sharing Duty – Statutory guidance for safeguarding organisations and their practitioners (September 2026)*

- *Prevent duty guidance: Guidance for specified authorities in England and Wales (2023)*
- *The use of social media for on-line radicalisation (July 2015)*
- *The Prevent duty: practical guidance for designated safeguarding leads (Sept 2026)*
- *When to call the Police – guidance for schools and colleges (NPCC, 2020)*
- *Meeting digital and technology standards in schools and colleges (March 2022, updated September 2026)*
- *Teaching online safety in school. (January 2023)*
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, February 2024)*
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education (July 2025)*
- *Review of sexual abuse in schools and colleges (Ofsted June 2021)*
- *Mobile phones in schools. (DfE June 2026)*
- *Working together to improve school attendance (July 2026)*

This policy should be read in conjunction with the following Summerhill policy documents: *Summerhill Code of Conduct, Managing allegations of abuse against members of staff including supply staff, trainee teachers, volunteers and contractors* and *Recruitment and Selection Policy.*

Further, there are numerous other safeguarding related documents of which staff need to be aware. They include, but are not limited to, the school's *Health and Safety Policy*, *Risk Assessment Policy, Summerhill Security Policy* and *Data Protection Policy*.

And finally,

the following government documents: *Keeping children safe in education 2026 Part one: Safeguarding information for all staff, Annex A: Further information)* and, where appropriate, *National minimum standards for boarding schools (May 2026)*

Should parents wish to obtain copies of the aforementioned policies, and any other policies linked to this *Safeguarding and Child Protection Policy,* please email the office at office@summerhillschool.co.uk.

Wherever the word 'staff' is used, it covers ALL staff, including domestic/kitchen staff, peripatetic teachers, volunteers, supply staff, trainee teachers and contractors.

Safeguarding Aims:

- To inform all staff and parents (including guardians and carers) about the school's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out; responsibilities which apply wherever staff members are working with the children, be it, for example, on school trips or when delivering lessons online.

- To provide an environment where all members of the community feel safe, secure, valued and respected.

- To raise awareness of all staff to the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

- To ensure all staff are alert to the needs of children with physical and mental health conditions.

- To ensure all staff recognise and protect those who may be vulnerable to radicalisation or exposed to extremist views.

- To ensure every complaint or suspicion of abuse from within or outside the school will be taken seriously and action will be taken in accordance with this policy.

- To ensure all staff develop a sense of 'professional curiosity' and an awareness that children, for many possible reasons, '*may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.' (Keeping children safe in education, Sept. 2026, p.11)*

- To ensure all staff understand the importance of reassuring '*victims'* that they are being taken seriously, that they will be supported and kept safe, and that no '*victim'* will be given the impression that they are creating a problem by reporting any form of abuse and/or neglect and no '*victim'* will ever be made to feel ashamed for making a report.

- To ensure all staff know how to respond in cases relating to the abuse, neglect, and exploitation of children, children managed within the youth secure estate (e.g. youth offender institutions, secure training centres and children's homes), and disabled children and will take action in accordance with government guidance and the locally agreed multi-agency safeguarding arrangements put in place by the Suffolk Safeguarding Partnership (SSP), that is, the three safeguarding partners, the local authority, police and integrated care boards (health services) who *'have a shared and equal duty to work together to safeguard and promote the welfare of children.'* (*Keeping children safe in education, Sept. 2026, p.39)*

- To ensure all staff know how to manage a report of child-on-child sexual violence and sexual harassment.

- To ensure that all staff (and indeed the whole school community) are aware that children may experience prejudice-based harm including racism, faith-based prejudice, gender-based prejudice and other forms of discrimination. These types of prejudice-based harms can have a negative life-long impact.

- To ensure all staff have an awareness of the different legal routes and the criteria, including the level of need, into the child protection system:

  - Sections 10 and 11, Children Act 2004, (targeted Family Help)
  - Section 17, Children Act 1989 (child in need)
  - Section 47, Children Act 1989 (significant harm)
  - Section 31, Children Act 1989 (care and supervision orders)
  - Section 20, Children Act 1989 (duty to accommodate – accommodating a young person into the Child Looked After system)

- To provide a systematic means of monitoring children known or thought to be at risk of harm. We will contribute to assessments of need and support packages for those children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant, up-to-date information about a child as possible, including submitting reports for child protection conferences in accordance with SSP procedures and timescales.

- To develop and promote effective working relationships with other agencies.

- To ensure all staff understand the need for good levels of communication between all members of staff.

Roles and Responsibilities

All Staff

Safeguarding and child protection is everyone's responsibility. All staff (including supply staff, contractors and volunteers) are under a general legal duty to:

• contribute to providing a safe environment in which children can learn.

• consider at all times the best interests of the child and take action to enable all children to have the best outcomes.

• attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL.

• be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues.

• assist children in need and to protect children from abuse, neglect, radicalisation and extremism.

• be familiar with the school's policies pertaining to safeguarding and child protection procedures and follow them.

• know how to access and implement the procedures, independently if necessary.

• keep a sufficient record of any significant complaint, conversation or event.

• report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and

• support social services and any other agencies following any referral.

In addition, with regard to the school's filtering and monitoring systems, staff should inform the school meeting and/or inform Andrew, Zoe, or Will if:

- they see or suspect unacceptable content is being accessed.
- unacceptable content can be accessed.
- their teaching content could cause a spike in logs.
- there is a failure or abuse of the system.
- they perceive unreasonable restrictions.
- they become aware of any abbreviations or misspellings that allow access to unacceptable content.

Note: The above duties which are placed on all staff are also, in essence, placed upon our students *'who as they grow up in the community, naturally recognise that they can make a significant contribution to safeguarding their peers.'* (Safeguarding and Child Protection Policy, p. 3)

For more information on online safety and the school's filtering and monitoring systems, see page 47 - 49 below.

The Designated Safeguarding Lead (DSL)

The DSL is given the time, funding, training, resources, and support to ensure they are able to fulfil all aspects of their role as described in *Keeping children safe in education* (Sept. 2026):

• **Managing Referrals**: the DSL will manage the referral of cases of suspected abuse, neglect, radicalisation, or any other relevant issue to the Local Authority Social Care Service (Customer First), Channel programme, DBS and/or Police as appropriate.

Further, the DSL will contact the Local Authority Designated Officer(s) (LADO) on any matter that the DSL considers cannot be properly dealt with internally.

• **Managing the filtering and monitoring system**: the DSL has lead responsibility for safeguarding and online safety which includes overseeing and acting on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems.

• **Working with others**: the DSL will liaise with Zoë, as principal, and a proprietor, on **all** safeguarding matters. Further, the DSL will liaise with staff on matters of safeguarding and act as a focal point for staff to discuss concerns if they feel unable to take concerns to the school meeting, the staff meeting or special attention meeting. Andrew, Will, and Zoë are available **at all times, day or night,** for staff to discuss **any** safeguarding concerns and to act as a source of support, advice and expertise.

Finally, the DSL will, as required, act as a point of contact with the Suffolk Safeguarding Partnership (SSP) and work with other agencies in line with *Working together to safeguard children.*

• **Information Sharing and Managing the Child Protection File:** the DSL is responsible for keeping up to date, detailed, accurate, secure, confidential records of concerns and referrals. All concerns, discussions and decisions made, the reasons for those decisions, and the outcome are recorded.

Further, where appropriate, the DSL (**or the deputy**) will ensure that any records are securely transferred to a new school promptly, that is, within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

Furthermore, the DSL would consider it appropriate to share any additional information with the new school in advance of the child leaving in order to help the new school have the right support in place, including risk assessments, (of others in the new school as well as the individual pupil), as soon as the child arrives. This is particularly important where there are concerns that a child may pose a risk to themselves or others as the receiving school is required to assess risk and put in place a safety and support plan. A direct DSL to DSL conversation would be appropriate where significant issues exist such as concerns about harmful behaviours or serious violence or when there is a history of weapon carrying, use or threats of use.

When receiving safeguarding information from another setting, the DSL will consider what information should be shared with other staff and when it is appropriate to do so.

Schools have clear powers to share, hold and use information for the purpose of identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. All information sharing is in line with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.

Note: Throughout all school documents, the term 'data protection laws' refers collectively to the aforementioned legislation.

• **Raising Awareness:** the DSL is responsible for reviewing and updating the school's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and for ensuring that parents can access the policy (e.g. via the school website) and know that the school may make referrals where abuse or neglect is suspected.

The safeguarding and child protection policy review is undertaken firstly by Zoë, Will and Henry and then by all the full-time staff. This ensures the effectiveness of the safeguarding arrangements as the policy '*is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt'.* (*Keeping children safe in education, Sept 2026, p.36)*

In addition, the Suffolk County Council Section 175/157 Safeguarding self-assessment audit is completed annually and is used to demonstrate that the school is effective in safeguarding and promoting its students' welfare.

Further, the DSL will provide Zoë, as principal, with a termly safeguarding action plan outlining, for example, safeguarding training to be undertaken by the DSL and others, policies to be reviewed etc.

Finally, the DSL will ensure that all staff are aware that safeguarding incidents can happen at any time or place and of the need to *'maintain an attitude of **'it could happen here'** where safeguarding is concerned.'* (*Keeping children safe in education. Sept 2026, p.21)*

• **Training, knowledge and skills:** the DSL undertakes training, (including online safety training) and regular updates, to obtain the knowledge and skills required to carry out the role including how to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.

• **Providing support to staff:** the DSL receives training to develop the required expertise so he can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.

• **Understanding the views of children**: the concept of having within the school a *'culture of listening to children and taking account of their wishes and feelings'* (Keeping children safe in education, Sept 2026, p.189) is something that lies at the heart of the Summerhill philosophy. Further, as has been said above in the introduction, reducing the power differential between adults and students increases the level of open, honest communication and trust between the two. However, most important of all is the fact that students are empowered to *'raise safeguarding issues themselves.'* (p.6 above). Students do not have to *'approach'* staff in order to have a safeguarding issue dealt with for they are empowered to take action themselves, calling a special meeting if necessary.

In addition, the contact details of various support services such as Childline and the Children's Commissioner's Help at Hand service are posted in key areas around the school.

Sometimes new members of staff find it difficult to work in an environment where they are expected to work with and relate to the children as if they were colleagues rather than pupils and at the same time be a trusted, respected and, at times, quite assertive adult who has a responsibility to ensure the community runs smoothly. It is for this reason that Summerhill has a one-year minimum induction programme in order to help new members of staff to adjust to Summerhill's unique working environment.

For more information on Summerhill's unique safeguarding environment, see Introduction above.

A full description of the responsibilities of the DSL is set out in Appendix ix of this policy.

The Deputy Designated Safeguarding Lead (DDSL)

Summerhill School has a Deputy DSL (Will Readhead) thus ensuring that there is always an appropriately trained person available. Safeguarding activities may be delegated to the DDSL but the ultimate lead responsibility for safeguarding and child protection (including online safety) remains with the DSL, that is, with Andrew Sturman. This lead responsibility should not be delegated.

To ensure continuity of safeguarding responsibilities, the school has robust cover arrangements in place for any periods when the DSL is unavailable due to illness, leave or other circumstances. Should the DSL be unavailable, the following actions will be taken:

- **All** staff will be informed via email that the DSL is unavailable and that until further notice his duties will be fulfilled by the DDSL.
- Further, the school secretary will be instructed to redirect all safeguarding related communications (e.g. email, mail) to the DDSL.
- A notice will be placed on the school's website stating that the current DSL is unavailable and all safeguarding enquiries should be directed to the DDSL whose contact details are to be found on the first page of the *Safeguarding and Child Protection Policy.*
- The DDSL will have access to the DSL's emails and can thus address any safeguarding issues arising from any emails sent directly to the DSL's email address.

The above actions will be taken should the DSL be unavailable for more than 24 hours. This ensures that any *safeguarding concerns are received, monitored and acted upon without delay.* (Keeping children safe in education. Sept 2026, p.38*)*

In the event of the DSL being unable to carry out his duties due to serious illness, the need for extended leave etc, the role of DSL will be taken by Will Readhead until such time as a replacement can be trained.

The Principal / Proprietor

'…..proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.' (Keeping children safe in education, Sept. 2026, p.36).

Zoë, as a proprietor and as school principal, is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end, Zoë will ensure that:

• the safeguarding and child protection policy and procedures adopted by the school are understood, implemented, and followed by all staff.

• sufficient time, training, funding, support, and resources are allocated in order to enable the DSL and DDSL to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings.

• matters which affect child welfare are adequately risk-assessed and for ensuring that the relevant findings are implemented, monitored, and evaluated.

• systems which operate with the best interests of the child at heart are in place for children to express their views and give feedback.

• all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistleblowing policy and low-level concerns procedures (see *Summerhill Code of Conduct*).

• children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

• the required digital and technology standards are met. Zoe has overall strategic responsibility for the school's electronic filtering and monitoring system and has given the DSL responsibility for managing the filtering and monitoring system and for ensuring that arrangements are in place for all parties (proprietor, SLT, DSL, IT service provider and the whole school community) to work closely together.

• safer recruitment procedures are '*in place, embedded and effective'*, (p.37) in line with *Part 3* of *Keeping children safe in education, (September 2026).*

• child protection files are maintained as set out in *Annex B* of *Keeping children safe in education, (September 2026).*

• where possible, the school holds more than one emergency contact number for each student.

• she acts as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff and volunteers) and liaises with the Local Authority Designated Officer (LADO); and

• she (or the DSL) refers cases to the Disclosure and Barring Service. The school has a statutory duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or has been removed from working in regulated activity or would have been removed had they not left. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to co-operate with an

investigation. The DBS will consider whether to bar the person. Referrals should be made as soon as possible and no later than one month.

Further, proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already.

• she refers cases to the Teacher Regulation Agency. If, on conclusion of the case, the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the school will consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching. The reasons a prohibition order would be considered are for 'unacceptable professional conduct', for 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice on this matter can be found in *Teacher misconduct: the prohibition of teachers* (Feb. 2022). Referrals should be made as soon as possible and no later than one month.

• she (or the DSL) refers cases to the Police where a crime may have been committed.

Finally, proprietors of independent schools should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and the SSP multi-agency safeguarding arrangements and all provisions of Annex B in *Keeping children safe in education* (*September 2026*).

For more information on the Human Rights Act 1998 and the Equality Act 2010, see Appendix vii.

For the provisions of Annex B (Role of the designated safeguarding lead), see Appendix ix.

Staff Recruitment, Selection and Training

Recruitment and Selection

Summerhill School is committed to having a robust recruitment and selection process for all who work or volunteer at the school. It includes conducting all the required checks (including Later Years Childcare) and it is Andrew, Will, and Zoë's responsibility, working with Lynn, to ensure that all adults who have access to children have been checked as to their suitability. Further, there is at least one person on every recruitment panel that has completed *Safer Recruitment* training. All staff including supply staff, trainee teachers, volunteers and contractors are required to follow the school's code of conduct.

For more information, see *Recruitment and Selection Policy, Summerhill Code of Conduct and Keeping children safe in education (Sept. 2026, Part 3)*

Staff Training

'…proprietors (of independent schools) *should ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities …'* (*Keeping children safe in education, Sept 2026, p.7)*

Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where safeguarding children is concerned.

All staff receive relevant safeguarding and child protection training (including online safety which includes, amongst other things, the *Prevent Duty*, *'an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring',* cyber security training, an introduction to Summerhill's 'Screening Laws' and an explanation on how we deal with online safety at Summerhill.) at induction. The safeguarding induction process begins with the new employee being emailed the school's safeguarding induction pack. A proportional, risk-based approach is taken to determine the level of information provided to part-time staff, volunteers, and contractors. The induction pack usually includes the following documents:

- *Safeguarding and Child Protection Policy*
- *Summerhill Code of Conduct*
- *Managing allegations of abuse against members of staff including supply staff, trainee teachers, volunteers, and contractors.*

The school's safeguarding induction pack also includes the following documents:

- *Keeping children safe in education 2026. Part one: Safeguarding information for all school staff* and *Annex A: Further information.*

And, for full-time staff, also:

- *Keeping children safe in education Part five: Child-on-child sexual violence and sexual harassment (Sept. 2026)*
- *Computer, Screens, Films and Internet Safety* (The school's 'Screening Laws')

Ideally, the pack (in either paper form or electronically) is given at least two full weeks before the new employee starts work at the school. The new employee is invited to discuss the

contents of the induction pack in a meeting / training session with the DSL (or the DDSL), set at a mutually convenient time, before there is any contact with students.

All new employees are reminded of the main safeguarding issues that the school faces and the existence and whereabouts of our disclosure forms. Finally, the new employee is asked to sign a document which states that they have read, understood, and agree to follow what is written in the documents they have received and are aware that Zoë, Andrew, and Will are available **at any time, day or night,** to answer any questions or concerns they may have about safeguarding children in Summerhill.

All training is in line with SSP advice. It is Suffolk Schools' choice (who are endorsed by the SSP) who provide the latest '*Introduction to Safeguarding*' training every **two** years for all staff, including the principal and deputy principals.

In addition, all staff, including the principal and deputy principals, receive regular safeguarding and child protection training updates as required, and at least annually to continue to provide them with the relevant skills and knowledge to safeguard children effectively. The depth and detail of training needed by different groups of staff varies according to the nature of their role and the extent of their involvement with children.

For full-time staff, the twice weekly school meetings and twice weekly staff meetings can serve, and often do, as safeguarding (including online safety) updates. The special attention meetings, which are usually held twice a term, also serve as safeguarding updates, as does the end of term oral reports. All these meetings are minuted.

Domestic / kitchen staff and part-time teachers are given safeguarding updates (including online safety) as and when required. For example, if there were concerns about a student's dietary habits, this would be passed on to the kitchen staff in order to aid monitoring the student's food intake. The information would normally be passed on orally by the DSL.

Online safety (including the Prevent Duty, and where children are being asked to learn online at home) is a significant element in the school's whole approach to safeguarding updates. Thus, all full-time, live-in staff receive **annual** online safety training usually delivered at the beginning of the academic year. Attendance is compulsory and a school law. Further, at least **two** members of staff receive online safety **lead** training every two years. Finally, it is a school law that all students attend a compulsory, age-appropriate, online safety chat/discussion every term. No person can continue to use the school's internet, or their mobile data, without attending.

All staff receive updated copies of the Summerhill School policies referred to above and are required to confirm that they have read, understood, and will follow what is written in them. In addition, whenever *'Keeping children safe in education'* is updated, the appropriate sections are reissued to staff. Staff training provides an opportunity to check and consolidate their understanding of the policies.

Should any member of staff, at any time, for whatever reason, struggle to understand what is required of them to safeguard children, they will be given as much support as is necessary to overcome the problem. If appropriate, an action plan will be drawn up and its implementation overseen by the DSL.

The DSL regularly assesses the appropriate level and focus of staff training so that they can respond to specific safeguarding concerns such as mental health, child-on-child abuse, and online safety.

All full-time, live-in staff undertake First Aid training and refresher training every three years.

All members of staff are encouraged to seek advice and to reflect on their work safeguarding and promoting the welfare of children. In addition, chats with Zoë provide a further opportunity to review and assess one's own practice as well as providing an opportunity to address any other issues such as work-related stress.

These are just some of the *'mechanisms'* put in place to help all staff safeguard children effectively. *('Keeping children safe in education', Sept 2026, p.7)*

Copies of the policies, including the school's *Staff Induction Policy/Programme*, are to be found in the Staff Handbook on the *Summerhill Staff Drive*. Further safeguarding information is to be found in the *Safeguarding Reference Documents* folder on the *Summerhill Staff Drive*.

For more information on staff training, see the file ***Safeguarding Training – Whole School***.

DSL and DDSL Training

The DSL and the Deputy DSL undertake training that is in accordance with locally agreed procedures to provide them with the knowledge and skills necessary to carry out their role. Training includes *Working Together to Safeguard Children* inter-agency training and *Prevent* awareness training.

All training is updated at least every two years.

In addition to the formal training set out above, the DSL's (and the DDSL's) knowledge and skills are refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to ensure the DSL (and the DDSL) understands and keeps up with any developments relevant to the role so they:

• keep abreast of best practice for promoting a culture of listening to children.

• remain up to date on the mechanics of inter-agency working as operated by the Suffolk Safeguarding Partnership.

• understand the assessment process for providing early help and intervention, for example through locally agreed common assessment processes such as early-help assessments.

• have an up-to-date working knowledge of how local authorities conduct child-protection case conferences so they can contribute to these effectively when required to do so.

• be alert to the specific needs of children in need, those with Special Educational Needs and young carers.

• understand and support the school regarding the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and

• be able to keep proper written records of concerns and referrals.

For more detailed information on the training undertaken by the DSL and the DDSL, see Appendix ix of this policy.

The Health, Safety and Welfare of Staff

The welfare of all the people who work or learn at Summerhill is of fundamental importance and we aim to provide a safe, secure, and pleasant working and living environment for everyone. We take very seriously the need to safeguard the health, safety, and welfare of all staff; indeed, staff wellbeing is a crucial part of a school's duty of care. The welfare of all staff (and students) is safeguarded and promoted by the drawing up and effective implementation of a risk assessment policy and by taking the appropriate action to reduce any risks that are identified.

For more information, see the school's *Risk Assessment Policy*, *Health and Safety Policy* and *Summerhill Security Policy.*

Also, for more information on this wide-ranging topic, see *Preventing and tackling the bullying and harassment of school staff* (DfE July 2026)

Finally, we understand that it is stressful and upsetting to be involved with any child who has suffered harm. Zoë, Andrew, and Will are always available to chat and talk through any anxieties.

Staff/Pupil Relationships

Although Summerhill's unique system reduces the power differential between staff and students, it does not eliminate it. Thus, all staff must be aware that as a result of their knowledge, position and/or the authority invested in their role, the relationship can never be one of equals and that all staff working with Summerhill students are in positions of trust in relation to them. Particular care should be taken when working in a one-to-one teaching or house-parenting situation.

For more information on staff/pupil relationships, see *Summerhill Code of Conduct*

Hierarchy of Intervention – safeguarding thresholds

The Suffolk Safeguarding Partnership publishes threshold guidance that all agencies, professionals, and volunteers can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children's needs are not static, and they may experience different needs – at different points on the continuum – throughout their childhood years.

Within the continuum, there are four levels of intervention:

Safeguarding Thresholds

Level 4 High Risk

High Risk Complex or Acute level of additional needs requiring specialist or statutory integrated response or Child Protection. (Section 47).

Level 3 Medium Risk

High or Complex Level of additional needs ranging from Family Help to Child in Need (Section 17).

Level 2 Low Risk to Vulnerable

Family Help – targeted early help. Multiagency.

Family Help Assessment and Plan. (Section 10 and 11)

Level 1 Universal

Universal services and community-based early help.

This supports children and families with Low Level Need.

For more information on Safeguarding Thresholds, see *Suffolk's Threshold of Need Guidance, (SSP, 2024)* and the *Thresholds of Need Matrix (SSP 2024)* on the *Summerhill Staff Drive.*

Or

Visit the Suffolk Safeguarding Partnership (SSP) website at: https://www.suffolksp.org.uk/

Note: The SSP states the following: *The Thresholds of Need Matrix has been compiled by the SSP and partners. It meets the requirements of the Government's 'Working Together to Safeguard Children 2026'.* Further, Suffolk County Council states that an *Updated Continuum of Need Guidance (previously known as the Threshold document) is being developed with the SSP and will support decision making across all levels of need.*

Family Help

All staff are particularly alert to the potential need for additional support for a child who:

- *is disabled or has certain health conditions and has specific additional needs*
- *has special educational needs (whether or not they have a statutory Education, Health and Care plan)*
- *has a mental health need*
- *is a young carer*
- *is pregnant and/or is a parent themselves*
- *has exhibited early signs of abusive, violent and/or harmful behaviours*
- *is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines*
- *is frequently missing/goes missing from education, home or care*
- *has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit*
- *is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation*
- *is at risk of being radicalised into terrorism*
- *has a parent or carer in custody, or is affected by parental offending*
- *is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse*
- *is misusing alcohol and other drugs themselves*
- *is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and*
- *is a privately fostered child.* (Keeping children safe in education, Sept. 2026, p.11/12)

However, all staff are aware that **any** child may benefit from support **before** statutory intervention and recognize the importance of providing support to a child for a problem as soon as it arises in order to prevent it from escalating. That the support could come from **universal services and community-based Early Help**, **or** from the **targeted early help level of Family Help.**

Universal services and community-based early help

Universal services and community-based early help play a crucial role in identifying emerging problems and providing support at an early stage. *Working Together to Safeguard Children* (March 2026, p. 45) states:

Universal services and community-based early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. This level of early help is provided through 'universal services' – such as education, health - and other community-based services.

Services can include support delivered through Best Start Family Hubs. For example, in Leiston, the "Best Start" Family Help services are primarily delivered through the Leiston Family Hub in Waterloo Ave. This service brings together practitioners from multi-agency partners and acts as a "one-stop shop" providing integrated support for families with children from pregnancy up to age 19 (or up to age 25 for young people with Special Educational Needs and Disabilities).

Family Help – targeted early help

Some children and families may require more targeted support than that offered at the universal and community-based Early Help level.

Targeted early help services delivered through **Family Help** is a more formal arrangement. It is coordinated by a local authority and/or their partners to address specific concerns within a family. A plan is put in place and a lead practitioner appointed. Examples of support include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Targeted early help may be appropriate for children and families who have multiple and or complex needs. It is a voluntary approach, requiring the family's consent to receive support and services offered.

Suffolk County Council states that Family Help is a key element of the Families First for Children reforms. It brings together targeted early help and child in need (section 17) services to remove thresholds with a focus on needs so that families can get the right help, at the right time, in a way that works for them with support that is joined up, relationship-based and focused on children's needs.

The MARF (Multi-agency referral form) and the EHA (Early help assessment) have been replaced by a single ***'Request for Support'*** form. Family Help, bringing together Targeted Early Help (Sections 10 and 11) and Child in Need (Section 17), will use a ***Family Help Assessment and Plan*** aligned with the new referral form.

A *Family Help Assessment* is a tool for practitioners and partners to evaluate strengths and needs within a family. The Family Help Assessment will be completed by either a Family Help Practitioner or Family Help Social Worker. In line with the concept of **'contextual safeguarding'**, any assessment will consider the whole range of social environments where a child spends their time and therefore where a child might be at risk e.g. the school, the home, the neighbourhood, online etc. Staff may be required to support other agencies in carrying out this assessment. The lead Family Help Worker will agree what additional support is needed and who will take the lead practitioner role. The lead Family Help Practitioner will coordinate the multi-agency response and support the family and friends' network to develop a Family and Friends-led **plan**.

For more information on 'Contextual Safeguarding', see *Contextual Safeguarding – an overview of the operational, strategic, and conceptual framework, (C. Firmin, University of Bedfordshire, November 2017, updated May 2020)*

Whatever the support required, it is important to remember that that support cannot be provided if the initial concern or worry about a child is not reported. Thus, if you have **any** concern about a child, you should it discuss with Andrew **and** Zoë or Will so that action can be taken; action that could involve the support outlined above or could be the provision of some support for the child within the school (for example, the use of the school meeting and some extra pastoral support provided by the house-parent or other members of staff) or a

combination of internal and external support. If appropriate, the school may inform the parents to provide further support.

It could be argued that our whole school culture of safeguarding, together with our school meetings, staff meetings and special attention list and end of term oral reports function as Summerhill's 'early help', in that it is in these 'forums' that often problems occurring in a child's life are first raised and then acted upon. Further, the high level of open, honest communication and trust between Summerhill children and staff naturally encourages children to raise any concerns they may have at an early stage so that effective early support can be provided. It could be argued that the weakest link in our 'early help' system is sometimes the lack of information we get from parents about our newest students. It is for this reason that all new students are put on our special attention list.

More information about Family Help etc can be found at https://www.suffolksp.org.uk/

And

in *Working Together to Safeguard Children (March 2026)*

Note: From **September 30, 2026**, information sharing is a **legal duty.** See *Information Sharing* (p.45) below.

Child Protection

Definition

Child Protection is part of safeguarding and promoting the welfare of children and is defined as an '***activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online.'*** *(Working together to safeguard children, 2026, p. 9)*

Indicators of abuse and neglect (*Keeping children safe in education, Sept. 2026, p.12 - 14)*

'All staff should be aware of indicators of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect… All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues overlap.'

Further, *'all staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse – physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation, serious youth violence, county lines and radicalisation.'*

Finally, *'all staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face.'* Abuse online *can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.'*

'In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.'

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

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

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

- ***Sexual abuse:*** *involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school's policy and procedures for dealing with it. 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 under 16 is an offence****,* regardless of whether they agreed to that activity.*

- ***Neglect:*** *the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.'*

*Sexual Offences Act 2003

www.legislation.gov.uk/ukpga/2003/42/part/1/crossheading/child-sex-offences

www.legislation.gov.uk/ukpga/2003/42/part/1/crossheading/rape-and-other-offences-against-children-under-13

Children with special educational needs, disabilities or health issues

Summerhill seeks to empower all its students to take a full part in its community, its life, decision-making and learning, as equals. We do not label children but will assess their needs and support them appropriately to ensure their wellbeing. Further, staff are aware that: '

'Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline' and that '*additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:*

- *assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration,*
- *these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children,*
- *the potential for children with SEND or certain medical conditions being disproportionality impacted by behaviours such as bullying, without outwardly showing any signs,*
- *communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,*
- *the need for intimate care or that these children are isolated from others,*
- *that these children are more likely to be dependent on adults for care, and*
- *these children may have issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school … or the consequences of doing so.*

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO)…' (*Keeping children safe in education Sept. 2026, p.64)*

For more detailed information on this topic contact: Suffolk SENDIASS (Special Educational Needs and Disabilities Information Advice and Support Service); a confidential and impartial information, advice and support service on issues related to Special Educational Needs and Disability (SEND).

https://suffolksendiass.co.uk

For more information on children at Summerhill with special educational needs and disabilities, see the school's *Special Educational Needs and Disabilities Policy.*

Safeguarding children with medical conditions

Keeping children safe in education (Sept. 2026, p.65) states that *an incident relating to the management of a child's … medical condition (including allergies) would not in and of itself warrant a referral…. A safeguarding referral would only be needed where an incident highlighted concern that the child … might be at an increased risk of being neglected,*

abused or exploited by persons inside or outside of their family unit because of their medical condition. For example, where the child is repeatedly sent to school without essential medication, thereby putting the individual at risk.

For more information on children at Summerhill with medical conditions, see *Medical Conditions Policy* and *Allergy and Anaphylaxis Policy.*

Young Carers

Staff need to be alert to the needs of any young carers the school may have among its day pupils. Providing care to a family member can impact on the carer's wellbeing, behaviour, attendance and attainment. As always, early identification is essential to ensure the right support is provided in a timely manner.

If you have any concerns about a child in this respect, inform Andrew and Zoe or Will as soon as possible.

Children who are lesbian, gay or bisexual.

Keeping children safe in education (Sept. 2026, p.65) states that:

A child or a young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

All staff need to be aware of this vulnerability and to be prepared to take action by, for example, bringing a case to the school meeting.

Children who are questioning their gender

In recent years there has been a significant increase in the number of children who are questioning their gender.

Keeping children safe in education (Sept. 2026, p. 66/67) makes it clear that schools should **not** *initiate any action in this area.* The following framework is only applicable where a parent or child 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').* **Social transition** could involve changes to a pupil's name, pronouns or appearance.

For staff, this means that changes relating to social transition should **not** be adopted unless a decision has been made by the school in consultation with the child's parents.

In terms of practical considerations this means that if a teacher is asked by a child to refer to them with a different pronoun, that teacher would not be able to adopt that change unless a decision had been reached to that effect in consultation with the child's parents.

There are many factors to consider when making decisions about supporting social transition and the following outlines those factors and, where appropriate, actions that will be taken.

- where a child who is questioning their gender **asks for support from the school**, the school's default position is that there will be a parental consultation where a social transition request is made. Thus, the school will communicate with the parents as a matter of priority

and the school acknowledges that the views of the child's parents carry great weight and will be properly considered.

The Cass Review is clear that outcomes for children and adolescents are best if they have a supportive relationship with their families and, in the vast majority of cases, we would expect schools and parents to work together to establish what is best for the child. (Keeping children safe in education. Sept. 2026, p. 68)

The only exception will be in the rare case where involving parents would constitute a greater risk to the child than not involving them. In this case, external advice will be sought before the parents are contacted or any decisions are taken. Decisions not to include parents for safeguarding reasons must be supported by clear safeguarding reasons rather than just general concerns.

Thus, if a child comes to you and requests that the school *make changes or put support in place in order to facilitate the child presenting as the opposite biological sex*, please inform Andrew and Zoe or Will as soon as possible.

Equally, if a child announces in the school meeting that he or she wishes to be called by another name; a name more usually associated with the opposite sex, a staff meeting will be held at the earliest opportunity to determine if that announcement constituted a request for support to start social transition.

It should be noted that at Summerhill announcements in the school meeting by children regarding name changing are quite common. The informal name change can last a few weeks or in some cases throughout the child's life at Summerhill. Often, the name chosen by the child could be associated with either sex.

In a case where a child confides in a member of staff about their feelings **but does not actually ask to make changes to start social transition**, there is no reason to break any confidence unless there is a related safeguarding risk. If there are any concerns about the child's wellbeing or safety, inform Andrew and Zoe or Will.

- the school has a statutory duty to safeguard and promote the welfare of **all** children. Thus, when considering a child's request for support with social transition it will not only consider its duty to the child questioning their gender but also its duty to their peers.

- naturally the thoughts and feelings of the child who is questioning their gender will be taken into account. The school will consider all aspects including such things as neurodiversity, health issues (mental and physical), the child's relationships with family, peers and others as well as the possibility of any bullying to which the school has a policy of zero tolerance.

The school will seek expert medical guidance particularly on the risks and benefits of social transition as a planned intervention.

- additional non-clinical professional advice will be sought from all members of school staff, particularly from those people who have taught the gender questioning child and the SENCO.

- the school's approach to social transition will be a very careful one because it is acutely aware that there is a lack of evidence on the long-term impact of social transition on young

people. Social transition is an active intervention that may have a significant impact on the child in terms of their psychological functioning and longer-term outcomes.

This very careful approach will be particularly applied to primary aged children, and the school recognises that support for full social transition would be agreed only in very rare circumstances.

The school will always aim to keep a child's options open so that they will never feel under pressure to commit to a particular pathway when still a child and there may well arise a situation whereby a child may wish to socially de-transition. If so, the school will work closely with parents and experts to ensure the child is fully supported.

- the school will sensitively explain the constraints on social transition. Since at Summerhill, no sport is taught, there are no changing rooms, and there are no toilets designated for one biological sex, this will only involve making it clear that supporting any degree of social transition will not include allowing the gender questioning child to sleep in bedrooms designated for the opposite sex. If the gender questioning child does not want to share a room with another child of the same biological sex, suitable alternative arrangements will be made if possible.

For more information on the school's living arrangements, see *Summerhill General Policy Statement (Community Life)*

- the school will comply with its obligations under safeguarding legislation, equality law **and** human rights law. This includes the rights of pupils and staff in relation to their religion or belief. Thus, for example if a member of staff finds it impossible to refer to somebody as a 'she' rather than a 'he' on the grounds of belief, the school supporting social transition might consider discussing options with pupils and staff such as using names instead of pronouns.

- the school will ensure that its decision-making process is clearly documented and records are kept. Further, the circumstances of a case and/or the needs of a child may change over time and thus, the original decision or aspects of it may need to be reviewed. Should this be required the parents and others (e.g. external agencies) will be involved.

- the school is aware that it is legally required to accurately record a child's biological sex.

- Lastly, staff need to be aware that there may be children *who have fully socially transitioned from an early age and may be* ***living in stealth*** *(that is, school friends/staff may be unaware of their biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state.* (Keeping children safe in education, Sept 2026, p.72). Thus, they will be particularly vulnerable. If you suspect that a child may be **living in stealth**, please inform Andrew **and** Zoe or Will.

Finally,

All staff need to be aware that **as a boarding school** there are *'additional factors to consider with regard to safeguarding'* (*Keeping children safe in education, Sept. 2026, p. 53*). This means that, amongst other things, all staff should be alert to the extra vulnerabilities of SEND children who board, children with medical conditions, children who are lesbian, gay or bisexual and children who are questioning their gender. Further, that unlike at day schools, boarders who are being bullied (offline) cannot escape their bullies for long periods of time as

they are not going home as often. In addition, all staff should be alert to the possibility of inappropriate pupil relationships and the potential for child-on-child abuse, in particular, the fact that sexual violence and sexual harassment can take place within intimate personal relationships between peers.

Fortunately, our unique whole school culture of safeguarding, particularly the expectation on all community members to safeguard each other, together with our all-important school meetings, the fact that a special meeting can be called (with the permission of the 'chairman' who is almost always a senior student) **by anybody, at any time, day or night,** if required, our use of ombudsmen, staff meetings and our special attention meetings ensures that **all** children are safeguarded at all times both online and off. (See the Introduction above for more detailed information.)

Categories - Signs and Indicators. What to look for.

NEGLECT

- Tired/listless.
- Unkempt.
- Poor hygiene.
- Untreated medical conditions.
- Hungry.
- Overeats when food is available.
- Poor growth.
- Poor/late attendance.

EMOTIONAL

- Clingy.
- Attention seeking.
- Over ready to relate to others.
- Low self-esteem.
- Apathy.
- Fearful/withdrawn.
- Sleep disorders.
- Depression/self-harm
- Drink/drug/solvent abuse.

PHYSICAL

- Unexplained injuries.
- Injuries on certain parts of the body.
- Injuries in various stages of healing.
- Injuries that reflect an article used.
- Flinching when approached.
- Reluctant to change.
- Crying/instability.
- Afraid of home.
- Behavioural extremes.
- Apathy/Depression.

SEXUAL

- Age-inappropriate behaviour/ knowledge.
- Promiscuity.
- Wary of adults.
- Running away from home.
- Eating disorders.
- Depression.
- Self-harm.
- Unexplained gifts/money.
- Smearing.

Please note that this list of signs and indicators of abuse is to serve as a guide and is not a definitive list and indeed, in some circumstances, could be misleading. What is particularly important is to be alert to, and take note of, any **negative changes** in appearance or behaviour. It is the **changes** that will tell you that something is going wrong in a child's life.

Any concerns about an individual, or individuals, must be reported to Andrew **and** Zoë or Will as soon as possible.

For more information on the signs of abuse go to the NSPCC website at:

https://learning.nspcc.org.uk/

What to do

If a child reports that he/she is being abused, in any way whatever, or neglected, you **must** do the following:

DO

- Stay calm, listen carefully and be supportive. Allow the child to speak without interruption.
- Ask open questions, e.g. 'Tell me when …/ 'Explain what…./ 'Describe what…..')
- Accurately record in writing what was said and done, by whom and in whose presence, using the child's words. Take note of any significant non-verbal behaviour. **Note date, time, and place.**
- Tell the child they have done the right thing by talking to you and tell the child what you will do next.
- Inform Andrew **and** Zoë or Will of your concerns immediately.
- Seek support for yourself.

DON'T

- Disbelieve what the child is telling you or be judgemental.
- Ask any leading questions or put ideas into the child's head or jump to conclusions.
- Stop or interrupt a child who is recalling significant events.
- Promise the child confidentiality – you must explain that you will need to pass on information to keep them safe.
- Express an opinion about the alleged perpetrator of the abuse.
- Use your own words to describe events.
- Investigate.
- View or forward possible illegal images of a child (if relevant).

Remember:

- **Make a clear and accurate record of what has been reported to you.**
- **Reassure the '*victim*' that they are being taken seriously and that they will be supported and kept safe. Never give the impression that they are creating a problem by reporting abuse.**
- **If the report involves possible illegal images, do not view, copy, print, share, store, save or delete them.** (For more information on illegal items, see *Searching and Confiscation* – Appendix ii)
- **Use the school's '*Recording Form for Safeguarding Concerns*'.** (Copy available on the Summerhill Staff Drive) **Sign it and put the date and time. You should be aware that your record of what was said could become part of a statutory assessment by children's social care and/or part of a criminal investigation.**

If a member of staff has concerns about a child's welfare, including any mental health concerns, they must inform Andrew **and** Zoë or Will as soon as possible.

However, if the concerns involve an allegation against a member of staff, the procedures set out in the section **Allegations about members of staff including supply staff, trainee teachers, volunteers, and contractors** below (p.38) should be followed.

Staff should not assume that somebody else will act. It is essential that all staff act on **any** concerns they may have about a child as that information might be critical in keeping a child safe.

The normal safeguarding procedures outlined in this policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

As has been said above, Zoë, Will, and Andrew are available **at all times, day or night,** to discuss safeguarding concerns. However, if in exceptional circumstances they are unavailable, or if there is a genuine concern that appropriate action has not been taken, this should not prevent, or delay, action being taken **by you**. You should speak to any senior member of staff and/or take advice from the local authority children's social care. **Remember that, if necessary, any member of staff may refer a matter to local authority children's social services directly**. Any action taken should be shared with the DSL or deputy as soon as possible.

Duties of the DSL on being notified of a concern about a child's welfare

When the DSL is notified of any concerns about a child's welfare, he will, in consultation with others, decide on the appropriate course of action. In particular, a decision will need to be made as to whether a referral should be made to the local authority children's social services (Customer First).

Factors that will be borne in mind when making the decision include:

• the best interests of the child.

• the nature and seriousness of the complaint.

• contextual factors.

• the referral threshold set by the SSP.

• the child's wishes or feelings.

• the inter-agency procedures of the SSP.

• where relevant, local information sharing protocols relating to Channel referrals.

If it is decided not to make a referral but to support the child with early help, the DSL will keep the situation under review and consider a later referral to local authority children's social services if the child's situation does not appear to be improving.

The DSL is responsible for maintaining written safeguarding records once an issue has been raised. These records are confidential. Such records will include:

• a clear and comprehensive summary of the concern.

• details of how the concern was followed up and resolved.

• a note of any actions taken, decisions reached and the outcome.

Having such records will help should there be any complaints about the way a case has been handled.

Making a referral to children's social services

When a child is not considered at risk of harm but still has an unmet need, that could mean that they are a **Child in Need**. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. In these cases, a referral should be made as soon as possible by the DSL to local authority Children's Social Care (Customer First). Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) a Family Help Assessment and Plan will be put in place by children's services.

School staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of the meeting in accordance with SSP procedures and timescales.

If a child is suffering, or is likely to suffer from harm, a referral should be made to children's social services and/or the police **immediately.** (Guidance on when to call the police is provided by the NPCC - *When to call the police: guidance for schools and colleges* (npcc.police.uk)).

If the initial referral is made by telephone, the DSL will confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL will contact children's social services again.

Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

If, after a referral, the child's situation does not appear to be improving, the DSL will contact children's social services again to follow the matter up, to ensure both that their concerns are addressed, and that the student's situation improves.

Where relevant, Summerhill School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is susceptible to being drawn into terrorism. Summerhill School will respond to requests for information from the police promptly, and in any event within five to ten working days.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, Summerhill School will consider whether any disciplinary action is appropriate against the individual who made it.

Informing parents

Ordinarily, the school will always undertake to share its intention to refer a child to Children's Social Care with their parents/carers. However, as has been stated below (p. 45) from **September 30, 2026**, information sharing is a **legal duty**. This means that when the school

holds information relevant to **safeguarding or promoting a child's welfare** and sharing it may help another agency covered by the duty to assess need, provide support or take action, the school must share it unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, the school will contact the Integrated Front Door (previously MASH) Professional Consultation Line for advice on this point.

For Channel referrals, the school will consider seeking the consent of the student (or their parent/guardian) however, the information sharing duty applies and consent is not required.

Finally, **staff must always act in the best interests of the child** and remember that data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Allegations about members of staff, including supply staff, trainee teachers, volunteers, and contractors

Guidance to staff

All staff need to be careful about placing themselves in situations which may

• put themselves or their students at risk of harm; or

• give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of ***safer working practices*** and should be familiar with the guidance on acceptable behaviour and actions contained in the school's *Code of Conduct*, which is issued to all staff. Particular care should be taken when working in a one-to-one teaching (particularly in specialist performing arts and sports provision) or house-parenting situation.

The following procedures will be used where it is alleged that a member of staff, including supply staff, a trainee teacher, volunteer, or contractor has:

• behaved in a way that has harmed a child, or may have harmed a child and/or

• possibly committed a criminal offence against or related to a child, and/or

• behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or

• behaved or may have behaved in a way **(in or outside of school)** that indicates they may not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (e.g. domestic violence at home). This is known as transferrable risk.

These criteria are often referred to as the **harms test** or **harms threshold**. The procedures briefly outlined below follow *Part 4* of *Keeping children safe in education* (Sept. 2026).

Reporting an allegation about staff

• Any safeguarding concerns about, or allegations against, a member of staff (including the DSL, any supply staff, trainee teachers, volunteers, and contractors) must be immediately reported to Zoë, or Will, or Henry. If the concerns and allegations meet the 'harms test', Zoë will, as principal and 'case manager', within one working day, contact the Local Authority Designated Officer(s) (LADO) on 0300 123 2044 and/or the Police on 01473 613500 if it is suspected a crime has been committed. In the case of the school receiving an allegation relating to an incident that happened when an individual or organization was using the school premises for the purposes of running activities for children the same procedures will be followed. In the case of a supply teacher or trainee teacher, the employment agency or training provider will also be contacted and fully involved. The school shares safeguarding responsibilities with the agency or training provider. The school is responsible for gathering the facts and managing the safeguarding process while the agency or training provider will usually lead on any disciplinary action. In no circumstances will the school simply cease to use supply staff etc. for safeguarding reasons without involving the agency/training provider and other authorities (e.g. LADO).

• If the allegation is against Zoë, or Will, or Henry, or anyone where there may exist a conflict of interest in reporting the matter to Zoë, **then it should be reported directly to the LADO.**

• In exceptional circumstances, such as an emergency or a genuine concern that appropriate action has not been taken, staff members can contact the LADO.

• If the school identifies:

- that a child has been harmed,
- that there may be an immediate risk of harm to a child, or
- if the situation is an emergency,

the school will contact local authority children's social care and, as appropriate, the police immediately.

• There are two aspects to consider when an allegation is made:

- **looking after the welfare of the child** – the DSL (or deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to local authority children's social care.

- **Investigating and supporting the person subject to the allegation.** Zoë, as the 'case manager', will hold discussions with the LADO. These discussions will include the nature, content and context of the allegation and a course of action agreed including any involvement of the police. Discussions will be recorded in writing and any communication with both the individual and the parents of the child / children agreed.

• When dealing with allegations, the school will:

- apply common sense and judgement.
- deal with allegations quickly, fairly, and consistently.
- provide effective protection for the child and support the person subject to the allegation.

Before contacting the LADO, the school will conduct a basic enquiry, in line with SSP procedures, to establish the facts to help the school determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. As soon as a basic enquiry has been conducted, contact with the LADO will be made.

Further information on conducting a basic enquiry and on the following aspects, can be found in the school policy *Managing allegations of abuse against members of staff including supply staff, trainee teachers, volunteers, and contractors* and in *Keeping children safe in education, Part four, Section one.* (Sept 2026):

• the initial response to an allegation.

• where an initial discussion leads to no further action.

• where further enquiries are necessary (including where there is a lack of appropriate resources within the school).

• allegations against supply teachers, trainee teachers and all contracted staff.

• allegations relating to an incident when an individual or organisation was using the school premises for the purposes of running activities for children.

• suspension – the school will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Alternative accommodation away from children might have to be arranged in cases where a member of boarding staff is suspended pending an investigation. Advice will be taken from the LADO in making this decision. The school will also discuss the matter of suspension with the employment agency if the adult under suspicion is a supply teacher. In the case of a trainee teacher, the matter will be discussed with the training provider.

• support (of the child(ren) involved, employees of the school subject to an allegation and the parents or carers of any child involved). The welfare of a child is paramount, and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. Any adult under suspicion, who is employed by the school, will receive as much help from the school as we are able to offer both financially and personally.

• confidentiality and information-sharing. All staff should note that in the event of allegations being made against a member of staff, the school must make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being considered or investigated. The restrictions on the reporting or publishing of allegations against teachers apply up to the point where the accused person is charged with an offence, or the DfE / TRA publish information about an investigation or decision in a disciplinary case.

• allegation outcomes.

• following a substantiated allegation. In the case of a member of teaching staff, the case manager must consider whether to refer the matter to the TRA to consider whether the individual should be prohibited from teaching. Further, there is a legal requirement to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; of if a person otherwise poses a risk of harm to a child. *This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.* (Keeping children safe in education, 2026, p.104)

• following a criminal investigation or prosecution.

• unsubstantiated, unfounded, false, or malicious accusations.

• returning to work.

• resignations and settlement agreements.

• record keeping - Records concerning allegations of abuse will be preserved at least until the accused has reached normal pension age or for a period of ten years from the date of the allegation if it is longer.

Further, for all allegations, other than those found to have been malicious or false, the following information must be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation.
- details of how the allegation was followed up and resolved.
- a note of any action taken, and decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded.
- a copy provided to the person concerned, where agreed by children's social care or the police.

- a declaration on whether the information will be referred to in any future reference.

• references – Substantiated allegations will be included in references. The information will be factual and not contain opinions.

• learning lessons.

• non-recent allegations.

For more information on safer working practices, see *Guidance for safer working practice for those working with children and young people in education settings.* (February 2022).

Low-level Concerns

Introduction

Keeping children safe in education (Sept 2026) states that the aim of the low-level concerns policy is to:

- *promote an open and transparent culture.*
- *enable schools and colleges to identify inappropriate, problematic or concerning behaviour early.*
- *minimise the risk of abuse, and*
- *ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.' (p.120/121)*

As this *Safeguarding and Child Protection Policy* makes clear, the democratic, self-governing system at Summerhill empowers both staff and students and provides the forums which greatly encourage openness and transparency. It is a system in which everybody, staff and student alike, is held accountable by the community for his or her actions. The school meetings, held two times a week, and the staff meetings, held at least twice a week, are the two most obvious forums but the very nature of the place (the 'panopticon') also helps to provide openness and transparency.

Any issue may be brought to the school meeting, and **anybody** can be 'brought up' at the school meeting, that is, they can be called upon to give an account or explanation for their conduct. Further, although *Summerhill has never professed to be a staff democracy*,* the staff are empowered as much as possible and again **any** issue can come to the staff meeting.

*See the Teacher and House-parent job descriptions for full-time staff

Finally, Summerhill encourages self-reflection:

'All members of staff are encouraged to seek advice and to reflect on their work safeguarding and promoting the welfare of children. In addition, chats with Zoë *provide a further opportunity to review and assess one's own practice as well as providing an opportunity to address any other issues……'. (Safeguarding and Child Protection Policy, p.19*)

Thus, this low-level concerns policy reinforces the mechanisms already in place which encourage an open and transparent culture, minimises the risk of abuse and which ensures all members of staff act within the professional boundaries set by Summerhill and within its ethos and values.

Sharing 'low-level' concerns about a member of staff (including supply staff, trainee teachers, volunteers, and contractors)

Keeping children safe in education (Sept 2026) defines a low-level concern as *'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 code of conduct, including inappropriate conduct outside of work, and*
- *does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.*

Further,

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

- *being overfriendly with children,*
- *having favourites,*
- *taking photographs of children on their mobile phone, contrary to school policy,*
- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or*
- *humiliating children.*

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.'

Furthermore,

'Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.' (p.121)

The use of the term 'low-level' does not imply that it is insignificant but rather that the behaviour towards a child does not meet the **'harms threshold'**. Thus, all low-level concerns about a member of staff (including, the DSL, supply staff, trainee teachers, volunteers, and contractors) must be reported **immediately to Zoë, or Will, or Henry** so any inappropriate behaviour can be quickly corrected. Any low-level concerns about supply staff, trainee teachers and contractors will be reported to their employers/training providers so any potential patterns of inappropriate behaviour can be identified. Where a low-level concern relates to Zoë, or Will, or Henry, or anyone where there may exist a conflict of interest in reporting the matter to Zoë, it should be reported to the designated officer at the local authority (LADO) on:

Telephone: 0300 123 2044

E-mail: LADO@suffolk.gov.uk

Further, all staff are encouraged to self-refer if they feel that their actions could have been misconstrued or that they have behaved in a way that they feel was inappropriate.

Responding to low-level concerns

All reports will be handled in a sensitive and proportionate manner. Further, all decisions on actions to be taken in response to any low-level concerns will be made on a case-by-case basis with Zoë, Will, Henry and Andrew taking the lead in consultation with others, both inside and outside the school, as appropriate. If the school is in any doubt as to whether the information shared about a member of staff as a low-level concern in fact meets the harm threshold, the school will consult with the designated officer at the local authority (LADO).

Where a third party has raised the concern, Zoë will collect as much evidence as possible by speaking:

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

The information collected will help categorise the type of behaviour that has caused concern and determine what further action may need to be taken. For example, to address incidences of low-level unprofessional conduct, it might be appropriate to re-assign a mentor to the member of staff thereby supporting the individual to correct their behaviour at an early stage.

Recording low-level concerns

All low-level concerns will be recorded in writing. The record will include:

- details of the concern.
- the context in which the concern arose.
- evidence collected where the concern has been raised by a third party.
- the decision categorising the type of behaviour.
- the action taken.
- the rationale for decisions and action taken.
- the name of the individual(s) sharing the concerns respecting any wish to remain anonymous as far as possible.

These records will be kept securely in the school office in such a way as to comply with the data protection laws. (See *Data Protection Policy*)

Records will be reviewed so that potential patterns of inappropriate, problematic, or concerning behaviour can be identified, and appropriate action taken such as internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

Further, wider cultural issues within the school will also be considered. Using the example given above, it may be that the school's mentoring system needs to be improved in order to minimise the risk of low-level unprofessional conduct being repeated by another new member of staff.

Records will be kept for at least until the individual leaves the school's employment.

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

For more detailed guidance on low-level concerns, see '*Developing and implementing a low-level concerns policy: A guide for organisations which work with children'. (*Farrer and Co. September 2024).

For more information on the school's code of conduct, see *Summerhill Code of Conduct.*

Information Sharing

Effective information sharing is essential to safeguarding and promoting the welfare of children.

When sharing information within the school and with external agencies, it is important to ensure that the safeguarding information is:

- relevant,
- necessary for the receiver of the information to know – a need-to-know basis,
- clearly presented and contextualised,
- focused and proportionate, and
- shared in a timely and effective manner and
- shared (and withheld) according to the relevant data protection principles.

Further, from **September 30, 2026**, information sharing is a **legal duty**. This means that when the school holds information relevant to **safeguarding or promoting a child's welfare** and sharing it may help another agency covered by the duty to assess need, provide support or take action, the school **must share it**.

The **information sharing duty** applies to responding to another agency's requests for information and in both scenarios (requests and sharing) consent is not required.

The **information sharing duty** applies for example, where there are concerns relating to early help, prevention and unmet need. Thus, for example, in the case of Family Help referrals, the school will always undertake to share its intention to make a referral with parents, but the school must share relevant information they hold, even where the family does not agree. Consent is no longer needed. Families still choose whether to take up any support offered.

The **information sharing duty** does **not** apply in the rare circumstance where it is considered that sharing information would be more detrimental to the child than not sharing. For example, where the child is put at immediate risk of harm by the information being shared.

Furthermore, all staff should know that data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, data protection has never been a barrier to sharing safeguarding information as a child's safety and welfare is paramount and that has not changed as is made clear in Keeping children safe in education (2026, p.41):

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

For more information on data protection and information sharing, see the school's *Data Protection Policy, Data Protection in schools* (DfE), *Information Sharing Duty – Statutory guidance for safeguarding organisations and their practitioners (Sept 2026), Working together to safeguard children (March 2026)* and the *Information Commissioner's Office (ICO) guide to sharing information to safeguard children and young people in the education sector in the UK.*

Whistle blowing

All staff should be aware of their personal and professional duty to raise concerns, where they exist, about the management of safeguarding children, which may include the attitude or actions of colleagues. In addition, all staff should be aware of their duty to share information quickly, to reassess any concerns they may have had when situations do not improve and to challenge any perceived inaction by, if necessary, reporting directly to children's social services (Customer First).

Information, guidance, and support can be obtained using the Suffolk Integrated Front Door Professional Consultation Line, (previously known as the MASH (Multi Agency Safeguarding Hub) Professional Consultation Line). The webchat facility allows professionals to access advice about a child at risk of abuse and to discuss the most appropriate and effective way of providing help and support. Advice will be given without recording the name of the child and using the webchat service enables the 'conversation' to be printed out.

The webchat service can be accessed, via the webchat icon which appears in the bottom right-hand corner, at:

https://suffolksp.org.uk/working-with-children-and-adults/multi-agency-safeguarding-hub-mash/

OR

Call the Suffolk Integrated Front Door (previously MASH) Professional Consultation Line on 0345 606 1499

Alternatively

Call the NSPCC Whistleblowing Advice Line on 0800 028 0285.

Email: help@nspcc.org.uk

For more information on whistle blowing, see *Summerhill Code of Conduct*

Specific Safeguarding Issues

***All** staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm. The following behaviours and indicators can be signs that children are at risk:*

- *drug taking and/or alcohol misuse*
- *unexplainable and/or persistent absences from education*
- *serious violence, criminal exploitation (including that linked to county lines), radicalisation, and*
- *consensual and non-consensual making or sharing of nudes or semi nudes. (Keeping children safe in education, Sept 2026, p.14/15)*

At Summerhill, the main safeguarding issues are the following:

Online safety

Online safety is concerned with supporting children and young people to develop safer online behaviours both in and out of school. Online safety is less about restriction and more about making the community aware of the risks as well as the benefits so that everyone can feel confident online.

'The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- ***content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,*

- ***contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,*

- ***conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and*

- ***commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel* Summerhill *students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)* **(***Keeping children safe in education, Sept. 2026 p.46)*

Summerhill's 'screening laws' and filtering and monitoring system

'The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.' (Keeping children safe in education, Sept 2026, p.48).

Following the advice of Chris Atkinson of the Child Exploitation and Online Protection Centre (CEOP) (Nov 2006), we believe that it is better to keep an open communication with children so that the whole school is aware of the issues rather than applying blanket bans. Summerhill School has a long history of not electronically filtering and monitoring the internet and allowing children to make their own choices about what is, and what is not, appropriate with guidance from the school meeting, often in the form of a 'screening law', when problems or issues arise.

However, we recognise the dangers of Internet use, including the additional safeguarding risks posed by generative AI, and further, we are aware that The Counter Terrorism and Security Act 2015 places a duty on the school to have ***'due regard to the need to prevent people from becoming terrorists or supporting terrorism'.*** (*The Prevent Duty*). Consequently, in the school meeting on March 24, 2017, the community decided to introduce an appropriate electronic filtering and monitoring system which applies to both staff and student accounts. The school's electronic filtering and monitoring system is provided by Smoothwall, and they have technical responsibility for:

- maintaining filtering and monitoring systems
- completing actions following concerns or checks to systems
- providing filtering and monitoring reports to the following:

  Andrew Sturman – Designated Safeguarding Lead

  Will Readhead – Deputy Principal and DDSL

  Henry Readhead – Deputy Principal

The school's Smoothwall firewall filters access to inappropriate material, including that relating to terrorism and other illegal activities such as pornography and violence. The electronic filtering and monitoring system is **reviewed** at least once every academic year as part of the school's annual review of its whole approach to online safety, or when:

- a safeguarding risk is identified
- there is a change in working practice
- new technology is introduced

Reviews of the system's effectiveness is conducted by Andrew Sturman (DSL), Henry Readhead (Deputy Principal) and Giles Davis (IT expert). They include checks that filtering is working appropriately on all internet-connected devices across the whole school site. All reviews are documented and any review always considers AI tool use and includes sample checks of users browsing.

For data protection aspects around browsing data and staff account monitoring, see the school's *Data Protection Policy*

Further, since the filtering and monitoring system should block harmful and inappropriate content **without** restricting students from learning how to assess and manage risk themselves, a key element of any review is the feedback received from the students either formally through the school meeting or informally. Thus, whilst safeguarding the child is a priority so too is listening to and responding to the voice of the child.

Other factors that are taken into account in any review include:

- the number and type of online safety meeting cases brought to the attention of the school meeting.

- feedback from members of staff, for example as to whether the system is unreasonably impacting on teaching and learning especially for example, RHSE.
- a risk profile of our students and the number of and age range of our students
- specific safeguarding issues, such as self-harm
- relevant safeguarding reports

Thus, the school has a dual filtering and monitoring system – an electronic one and a community-based filtering and monitoring system and it is the community which decides, within certain limitations, what websites are blocked. Thus, the *'appropriate filters'* that the school employs are the school screening laws (our acceptable use policy) together with the electronic filtering system provided by Smoothwall.

One of the roles of the school's 'screening police' is to suggest what websites should be added to the filtering system list and then take their suggestions (their 'proposal') to the school meeting. Any member of the community can, at any time, raise an objection to a particular website that is on the list. Equally, any member of the community can propose that a particular website is added to the list. Thus, a system has been created which, like our age ratings system, promotes regular, healthy discussions as to what constitutes '*potentially harmful and inappropriate online material.' (Keeping children safe in education, Sept. 2026 p.46).*

Every member of the community is expected to use the internet safely. Further, every member of the community is responsible for policing the screening laws, or *'monitoring'* internet usage. However, the 'screening police' also help to ensure that the screening laws are followed, and that all members of the community are safely using the internet. Consequently, the screening police have been given, by the community, the power to give screen bans to any community member breaking the screening laws. Thus, the *'monitoring systems'* that are in place include not only our whole culture of safeguarding each other, at the heart of which stands our all-important school meetings, but also our 'screening police' and an electronic monitoring system.

Although the effectiveness of our electronic system is regularly reviewed, the reality is that no electronic system is perfect, and school laws are sometimes broken, or attempts are made to break the screening laws. Should any problems arise (for example, a student becoming upset by something they have seen online, or a student visits, or attempts to visit, a site that is proscribed, or a student inappropriately uses an AI tool), it can be quickly and effectively dealt with by a house-parent, teacher, 'carriage kid', 'screening police', or **any** community member. The issue can then be brought to the attention of the school meeting thus creating a learning experience for all.

Thus, by including all members of the community in the decision-making process the school's method of filtering and monitoring goes beyond the guidelines in *Keeping children safe in education* (Sept 2026, p.48) which state that schools should:

- *identify and assign roles and responsibilities to manage filtering and monitoring systems.*
- *review filtering and monitoring provision at least annually.*
- *block harmful and inappropriate content without unreasonably impacting teaching and learning.*
- *have effective monitoring strategies in place that meet their safeguarding needs.*

Note: S*chools can use the department's 'Plan technology for your school service' to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.*

Mobile Phones (and other smart technology with similar functionality)

Keeping children safe in education, (Sept. 2026, p. 47), states:

All schools should be mobile-free environments by default; anything other than this should be by exception only.

Further, *the department expects schools to implement a policy whereby pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.*

In addition, the statutory guidance *Mobile phones in schools* (June 29, 2026, p.6) states that the *risks that are associated with the use of mobile phones, both in school and more broadly*, *…can include a loss of focus in lessons, classroom disruption and an increase in bullying.*

Further, the statutory guidance goes on to state that:

B*oarding schools…should prohibit the use of mobile phones throughout the teaching day* and *develop appropriate policies regarding the use of mobile phones during the rest of their pupils' time at school, which safeguards and promotes the welfare of the children in their care.. (p.3).*

Summerhill, because of the very nature of the place, does not experience such problems as *a loss of focus in lessons, classroom disruption and an increase in bullying* due to the presence of mobile phones. However, despite the loss of important teaching and learning opportunities created by the ban, and after three in-depth discussions with the whole community, the school meeting on July 13, 2026, passed an additional screening law which stated:

No one can use their mobile phone (or other smart technology with similar functionality to mobile phones) between the hours of 9.00 am and 3.00 pm on days that there are lessons.

For absolute clarity, this includes *during lessons, the time between lessons, breaktimes and lunchtime.*

Exceptions exist for health and safety reasons and for 'Carriage' students who have access *to their mobile phone at certain and limited times and locations, reflecting* (ibid, p.3/4) the increased level of responsibility placed upon them as senior students by the community.

Outside those times (9.00 am and 3.00 pm, Monday to Friday), the use of mobile phones (and other smart technology with similar functionality) by any members of the community is managed by our screening laws, (copies of which are displayed throughout the school) and should any problems arise they are dealt with by the school meeting. Further, all mobile phone providers offer free parental control services which limit the content children can access via the mobile network to items suitable for under 18s and parents are encouraged to ensure that their service provider has switched on the parental control settings on their child's mobile phone.

See *Computer, Screens, Films and Internet Safety* (the school's 'Screening Laws') and *Summerhill Code of Conduct* for more information.

Safeguarding and Generative AI

The school recognizes that there are a number of concerning aspects around the use of generative AI of which all members of the community need to be aware; safeguarding risks such as exposure to inappropriate content, harmful contact, bias, and over-reliance on technology are just four very general risks.

More specific risks include 'cognitive offloading', that is, the practice of delegating mental tasks to AI rather than developing one's own knowledge and skills. This is not just a pedagogical issue but a safeguarding one because it can lead someone to seek help from AI rather than a human and thus important safeguarding issues or disclosures can be missed. In addition, there is the risk of a child becoming emotionally attached to an AI chatbot and indeed some AI tools are designed in ways that encourage children to form emotional connections with them. Linked to this is the fact that many children (and indeed adults) are turning to AI tools that offer mental health support.

Another safeguarding risk from AI is the use of AI tools that digitally remove clothing from images of real people. The images these tools produce are, of course, illegal and can amount to child-on-child abuse. (See below). The Crime and Policing Act 2026 criminalises the making, adapting, supplying or offering to supply these tools, apps and services. However, this is unlikely to remove or even diminish the safeguarding risk.

All safeguarding incidents involving AI, like all other safeguarding incidents, must be reported to Andrew **and** Zoe or Will and, if appropriate, brought to the attention of the school meeting.

The school uses appropriate filtering and monitoring, along with education to mitigate these risks.

For more information on Generative AI, see the school's *Generative Artificial Intelligence (AI) Policy, Generative artificial intelligence in education* (DfE updated Aug 2025) and go to:

https://gov.uk/government/collections/using-ai-in-education-settings-support-materials

Nudes and semi-nudes, including where generated by AI

The *term '**making or sharing nudes and semi-nudes'** refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term **'images'** includes all visual content, such as photographs, videos and livestreams…. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes or 'deep nudes'. (Keeping children safe in education, (Sept. 2026, p. 6)*

The types of incidents covered by this are:

- A person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18.
- A person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18.
- A person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

These types of incidents are illegal but should be treated as safeguarding issues, regardless of whether they are consensual or non-consensual, in which, as always, the primary concern

should be the welfare and protection of the young people involved. A proportionate approach that considers the age, development and circumstances of the children involved as well as any elements of coercion, exploitation or vulnerability will be taken. With these types of incidents, schools are under no obligation to make a referral to the police or children's social care. However, an immediate referral should be made if:

- the incident involves an adult.
- there is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts and any pupil in the imagery is under 13.
- You have reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

Although evidence suggests most children and young people aren't creating or sharing nude and semi-nude images and videos, the potential risks are significant and since it is illegal, it makes responding to incidents involving children complex. Thus, it is of paramount importance that all staff are alert to the possibility that incidents of this type may be reported and should know how to respond.

Responding to the report:

The member of staff to whom the incident is reported must ensure that:

- The disclosure is taken seriously and that the child, who is likely to be embarrassed and worried about the consequences, is made to feel as comfortable as possible and is reassured that they will be supported and kept safe.
- **They do not view, copy, print, share, store, save or delete any possible illegal images.**

Further, the member of staff should:

- Not promise confidentiality to the student at the disclosure stage.
- Write up an accurate summary of the report. Only record the facts as presented.
- **Inform Andrew and Zoë or Will immediately.**

(For more information on how to respond to a report, see **'What to do'** (p.33))

All decisions on actions to be taken in response to these types of incidents will be made on a case-by-case basis with Andrew, Zoë, Will and Henry taking the lead in consultation with others, both inside and outside the school, as appropriate. As always, decisions made will be based on consideration of the best interests of any child involved.

For detailed information on how to respond to an incident, see *Sharing nudes and semi-nudes: advice for education settings working with children and young people. (UK Council for Internet Safety, February 2024)* a copy of which can be found in the *Safeguarding Reference Documents* folder on the *Summerhill Drive.*

Also, see guidance from the National Crime Agency's CEOP Education programme on the following two related subjects:

Understanding and responding to AI-generated child sexual abuse material, **and**

Financially motivated sexual extortion (FMSE)

Social Media

At Summerhill, we allow access to sites, such as Facebook, Instagram, Snapchat and YouTube etc. because they allow children to communicate with friends and family. However, access to social media sites is only given to those who are 'Shack and Up'. Allowing access to such sites assists in the general aim of encouraging responsible use of the internet.

Further, it is considered natural, and also an important means of safeguarding children, for staff and students to communicate with each other using social networking sites and messaging services. Communication can not only take the form of text but also image. This allows for rapid and meaningful communication to take place at any time. There is an unwritten school law which states that ***'you must take a photograph / video down and/or delete it if you are asked'***. Should any problems arise, they would go to the school meeting.

For more information, see *Summerhill Code of Conduct*

Remote Education

If necessary, online lessons will be available for those few students who are unable to physically attend lessons in the school's classrooms. Further, if necessary, some online lessons will be taught by teachers who are unable to physically attend school. In these situations, online safety is a key priority. Of particular importance is informing parents what their child, or children, are being asked to do online, what sites they will be asked to access and who from the school will be interacting online with their child.

For more detailed information on the provision of online lessons, see the school's *Remote Education Policy.*

Cyber Security

Keeping children safe in education (Sept 2026, p.49) states that the school, as part of its safeguarding responsibilities, *should take measures to safeguard children by protecting personal information and ensuring their school … has appropriate cyber security systems in place.*

Meeting digital and technology standards in schools and colleges (DfE March 2022, updated September 2026) states:

Cyber incidents and attacks have significant operational and financial impacts on schools …. These incidents or attacks will often be an intentional and unauthorised attempt to access, change or damage data and digital technology. They could be made by a person, group, or organisation outside or inside the school and can lead to:

- *safeguarding issues due to sensitive personal data being compromised*
- *impact on student outcomes*

- *a significant data breach*
- *significant and lasting disruption, including the risk of repeated future cyber incidents and attacks, including school or college closure*
- *financial loss*
- *reputational damage*

Our electronic filtering and monitoring system helps the school to reduce the risks related to a cyber incident by preventing access to potentially malicious sites or resources. Further, a member of staff with suitable professional experience has responsibility for overseeing IT management and along with the senior leadership team, this person is responsible for making recommendations and the implementation of approved necessary upgrades and changes. Consequently, a rolling programme of upgrades and modernisation is in progress, and this work is ongoing in order to meet the required cyber security standards by 2030 at the latest.

Further, in line with the DfE's *Cyber security standards for all schools and colleges*, the school conducts a full cyber risk assessment **annually** and performs a formal review of that assessment **every term**.

However, obtaining a secure network does not just depend on the appropriate infrastructure and risk assessments. A key element in mitigating the risks of a cyber-attack or incident is training. Thus, all staff who have access to the school's digital information are required to undergo annual cyber security training. Further, all students are reminded of the importance of taking security measures in their compulsory online safety chats. Any issues are brought to the attention of the school meeting.

See *Summerhill Cyber Security Audit & Risk Assessment*, the *Summerhill IT Risk Register* and the *Data Protection Policy* for more information

For more general information, go to:

Cyber security standards for schools and colleges and / or the *National Education Network*, and / or the *National Cyber Security Centre – NCSC*.

Raising Awareness of Online Safety Issues (incl. the safeguarding risks posed by AI)

Awareness of online safety issues is raised in various ways, most important of which is the school meeting which brings the whole school's attention to these issues. Other 'formal' settings include the age-appropriate, online safety discussions and the relationships and sex education discussions, both of which are held on a regular basis and are led by a trained member of staff.

Raising awareness of online safety issues can occur at any time in the formal classroom setting. Educating students about any online risks that they may encounter in life is done informally whenever the opportunity arises. Further, our teachers and house-parents are available to provide IT support/online safety sessions with individual students should it be necessary.

A variety of online safety teaching is done in an array of informal settings such as students' rooms and house-parent rooms. This teaching can be student to student (e.g. one student

informing another about how to set his privacy settings on Facebook), adult to student or student to adult.

Finally, posters depicting certain risks involved in using the internet and a list of the school laws governing the use of the internet (our AUP) are displayed in key areas around the school.

Thus, it can be seen that just as the internet is part of our everyday life, so too is online safety.

Reviewing Online Safety

Summerhill is aware that the world of information and communications technology is a rapidly evolving one, as are the risks and harms related to it. Consequently, the school's **whole approach** to online safety is reviewed at least annually; a review which is supported by a review of the filtering and monitoring systems, cyber security system and various online safety related risk assessments.

Any concerns about an individual in relation to **any** online safety issue (including radicalisation), must be reported to Andrew **and** Zoë or Will as soon as possible.

In the case of an individual being identified as being at risk of radicalisation, the school will consider the level of risk in order to identify the most appropriate action, which could include referral to the Channel programme or children's social care (Customer First).

For more information on online safety, see *Summerhill Code of Conduct, Prevent Duty Risk Assessment, Online Safety Risk Assessment, Generative Artificial Intelligence (AI) Policy, Internet Use and Screening Policy, Data Protection Policy* and the school's screening laws (*Computer, screens, films, and internet safety (incl. mobile data, 4G etc.*).

Also, see *Keeping children safe in education*, (*Sept. 2026, p. 177 - 179)* **and**

Professionals Online Safety Helpline (POSH) at:

https://saferinternet.org.uk/professionals-online-safety-helpline

Child-on-Child Abuse (including harassment and violence)

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator (Keeping children safe in education, Sept 2026, p.15)

Most instances of child-on-child 'abuse' at Summerhill are dealt with by the school meeting and are, in the main, low-level harassment cases. However, **all** staff should be aware that safeguarding concerns can arise as a result of conduct by a child towards another, that child-on-child abuse is preventable and that all staff have an important role to play in preventing it by not only knowing how to recognise behaviours and indicators of risk early but by knowing that prompt action and support is essential to prevent issues escalating. Examples of conduct which could raise safeguarding concerns are:

• *bullying (including cyberbullying, prejudice-based and discriminatory bullying),*

• *discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents,*

• *abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),*

• *physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),*

• *serious physical assault and harm, or the threat of harm with a weapon,*

• *sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence),*

• *sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,*

Note: Harmful sexual behaviour, sexual violence and sexual harassment may include misogyny/misandry.

For more information on this topic, see page 59 below.

• *causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,*

• *consensual and non-consensual making or sharing of nudes and semi-nudes,* (this includes those generated using AI)

• *upskirting,* (which is a criminal offence) *which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress, or alarm, and*

• *initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element). (Keeping children safe in education, Sept. 2026, p.16)*

Responding to a report

Any allegation against another child, whether it has taken place on or off-site, must be immediately reported to Andrew **and** Zoë or Will. If appropriate, they will, within one working day, contact local authority Children's Social Care (Customer First) on 0808 800 4005 and the Police will be contacted if it is suspected a crime has been committed.

In the event of a disclosure, all children involved, whether *'offender'* or *'victim'*, will be treated as being 'at risk'.

Any child under suspicion will be suspended until further notice if there is no other reasonable alternative. Advice will be taken from local authority Children's Social Care (Customer First) in making this decision. The child will receive as much help from the school as we are able to offer.

For information on when to call the police, see *'When to call the Police – Guidance for schools and colleges'* in the *Safeguarding Reference Documents* folder on the *Summerhill Drive.*

Addressing the needs of *'victims'*, *'offenders'* and any other children affected by child-on-child abuse.

As has been said, the majority of cases are low level harassment cases and usually all the '*victim*' requires is the support of the meeting. However, should the *'victim'*, or any other child affected by child-on-child abuse, require further support then the nature and level of support will depend on the individual circumstances and the level of need. These can include a quiet word from an ombudsman, asking the house-parent to provide support, providing formal counselling, referring to the local authority children's services or referring to Child and Adolescent Mental Health Services (CAMHS) etc.

Equally, the *'offender'* may require support such as that which is outlined above.

Where there is a safeguarding concern, Summerhill School will ensure that the student's wishes and feelings are taken into account when determining what action to take. **We will always act in the best interests of the child.**

Additional information

The following should be particularly noted:

It is recognized that girls, children with SEND and LGBTQ+ children are at greater risk of some (but not all) forms of child-on-child abuse, including sexual violence and sexual harassment. However, although it is more likely girls will be *'victims'* and boys *'perpetrators'*, **all** child-on-child abuse is unacceptable and will be taken seriously.

Further, it is recognized that child-on-child abuse can happen both inside and outside of school and online and that action must be taken wherever it occurs.

In addition, all staff need to be aware that even if no cases come to the school meeting, it does not necessarily mean it is not happening. This is particularly important in the light of recent evidence* which clearly suggests that sexual harassment and online sexual abuse is so commonplace that young people see no point in reporting it. Behaviours such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts have

become normalised in some schools. **Thus, all staff need to be particularly alert to this form of child-on-child abuse and hence the additional, more detailed, commentary given below on page 59 onwards.**

If you have *any* concerns about a child, it must be reported to Andrew and Zoë or Will as soon as possible.

Finally, at Summerhill, **no form of abuse whatsoever** is tolerated by the community, and neither is it ever passed off as *'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'*. *(Keeping children safe in education, Sept. 2026, p.52).* Any form of abusive behaviour including all forms of discrimination is always challenged by both adults and children alike since a failure to do so can lead to a culture of unacceptable behaviours, misogyny and an unsafe environment for all. This zero-tolerance approach to child-on-child abuse (including sexual harassment and sexual violence) is reinforced by our RSHE programme which examines, at an age-appropriate stage, issues such as:

- *supporting children to develop the skills that form the building blocks of all positive relationships,*
- *healthy and respectful relationships,*
- *boundaries, consent and kindness in relationships,*
- *stereotyping, prejudice and equality,*
- *body confidence and self-esteem,*
- *how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour,*
- *the concepts of, and laws relating to all forms of sexual harassment, and abuse, and how to access support,*
- *what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and*
- *understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.* (Keeping children safe in education, Sept 2026, p.44/45)

However, more important than the theoretical, taught ideas contained within any RSHE programme is Summerhill's unique empowering democratic system which provides such things as the school meeting, the use of elected ombudsmen and our whole school culture of safeguarding each other which taken altogether ensures that the risk of child-on-child abuse is minimised as much as possible.

*****Evidence includes testimonies submitted to the *Everyone's Invited* website and Ofsted's *Review of sexual abuse in schools and colleges (June 2021).*

For information on the school's relationships and sex education courses, see *Relationships and Sex Education Policy and Curriculum Outline.* A copy is on the school's website and in the staff handbook.

For more information on Summerhill's unique system, see the Introduction above (p. 4-7) and *Summerhill General Policy Statement (Community life)*

Child-on-Child Sexual Harassment and Sexual Violence

Understanding harmful sexual behaviour (HSB), sexual harassment and sexual violence

Harmful sexual behaviour can occur between two or more children of **any age and sex** and within intimate personal relationships between peers. It can also occur through a group of children towards a single child or towards another group of children. Harmful sexual behaviour exists on a continuum and may escalate into sexual harassment or sexual violence. It can happen face-to-face (both physically and verbally) inside or outside of school and online. Abuse that occurs online or outside of school is no less serious than abuse that occurs in school. **Any** report of harmful sexual behaviour, sexual harassment or sexual violence should be taken seriously, wherever it occurs.

To minimise the risk of harmful sexual behaviour, sexual harassment and sexual violence becoming part of the school environment, the following should be noted:

- a **zero-tolerance** approach to sexual harassment and sexual violence is essential. Anything less and there is a danger that a culture that normalises abuse will come into being. Here the use of the school meeting etc. is essential.

- **misogyny** has an escalatory nature that moves from subtle attitudes to severe physical harm. It has been described as a 'gateway' to extremism. Thus, early identification of misogynistic attitudes and bringing them to the attention of the whole school community via the school meeting is key.

- all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual require a safeguarding response which takes into account the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability. Again, the use of the school meeting is very important.

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- finally, as has been said before, it is more likely that girls will be the *'victims'* of sexual harassment and sexual violence and more likely it will be *'perpetrated'* by boys. Further, children with disabilities are **three times** more likely to be abused than their peers.

Children who are *'victims'* of harmful sexual behaviour, sexual harassment and/or sexual violence, wherever it happens, will likely find the experience stressful and distressing; emotions which will be exacerbated if the alleged *'offender'* attends Summerhill. Further, the child's educational attainments will also be adversely affected. A *'victim'* may not find it easy to tell staff about their abuse verbally and so, in some cases, the *'victim'* may not make a direct report but rather a friend may make a report on behalf of the *'victim'*. Alternatively, you may overhear a conversation that suggests a child has been harmed or **negative changes** in a child's appearance or behaviour might indicate that something is wrong.

As always, if you have <u>any</u> concerns about a child's welfare, you should act on them immediately rather than wait to be told something. Early intervention can help prevent problematic, abusive and/or violent behaviour in the future.

As has been suggested above (Introduction, p.4) incidents at Summerhill that could be classified as sexual harassment have been extremely rare, of a comparatively minor nature and dealt with by the school meeting. However, in accordance with the concept of **'it could**

happen here', and in acknowledgement of the large scale of abuse happening nationwide, it is of paramount importance that all staff are alert to the possibility that in future more serious incidents of harmful sexual behaviour, sexual harassment and even of sexual violence may **indeed happen here or might well be happening here and is not being reported or recognised.**

[For more information on harmful sexual behaviour, sexual harassment and sexual violence including definitions, see Appendix vi below]

The following provides an outline of the actions to be taken in the event of a report.

Firstly, it should be noted that all decisions on actions to be taken will be made on a case-by-case basis with Andrew, Zoë, Will and Henry taking the lead in consultation with others, both inside and outside the school, as appropriate.

Responding to a report of HSB, sexual harassment and/or sexual violence

The immediate response to a report

The school's initial response to a report from a child is incredibly important. A supportive, empathetic and respectful response can empower *'victims'* to come forward, whilst a poor response may discourage further disclosures. Consequently, the member of staff to whom the incident is reported must ensure that:

- the *'victim'* is reassured that they are being taken seriously, they will be supported and kept safe, regardless of how long it has taken them to come forward and where the abuse occurred e.g. online/offline, inside/outside of school.
- the *'victim'* is not made to feel ashamed for making a report or their experience minimised or that they are creating a problem by doing so.
- if the report involves sharing nudes or semi-nudes, **do not view, copy, print, share, store, save or delete any possible illegal images.** If appropriate, take possession of the device and hand it to the police as soon as possible.

Further, the member of staff should:

- not promise confidentiality to the student at the disclosure stage and ensure they understand what the next steps will be.
- recognise that trauma can impact memory so details may be lacking and the initial disclosure may not reflect the full extent of the abuse. Indeed, the initial disclosure may be just the tip of the iceberg.
- remember certain children may face additional barriers to disclosure, e.g. EAL students and children with vulnerabilities related to disability, sex, ethnicity or sexual orientation.
- not ask leading questions but can ask if the student has been harmed and what the nature of the harm is.
- explain that the law is in place to protect children rather than criminalise them.
- **write up an accurate summary of the report. Only record what the child says. No interpretation or personal opinion.**
- inform Andrew **and** Zoë or Will immediately.

Remember:

'Most young people only choose to talk to someone they really trust, so you are already doing the right thing' (Responding to a child's disclosure of abuse', NSPCC)

[For more information on how to respond to a report, see '**What to do'** (p.33)]

Confidentiality

The *'victim'* may ask you not to tell anyone. In this case, seek advice from Andrew, Zoë, and Will. They will consider the following:

- *informing parents or carers, unless doing so increases the risk to the victim.*
- *referring to local authority children's social care if the child is at risk of harm, in immediate danger, or has been harmed, and*
- *reporting crimes such as rape, assault by penetration or sexual assault to the police. Even if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases. (Keeping children safe in education. Sept 2026, p.134)*

They will have to balance the *'victim's'* wishes against their duty to protect the *'victim'* and other children. It is highly likely that it will be in the best interests of the *'victim'* to seek advice from others in order to obtain specialist support. The school will contact the Integrated Front Door (previously MASH) Professional Consultation Line for advice on this point. If it is decided to make a referral against the *'victim's'* wishes, the reasons will be explained to the *'victim'* and appropriate specialist support will be offered.

Note: From **September 30, 2026**, information sharing is a **legal duty.** See *Information Sharing* (p.45) above.

Anonymity

The school will do all they can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. This will mean carefully deciding, among other things, who should know about the report, what support will be provided and the impact of gossip, both online and offline, in the spreading of rumours and exposing '*victims"* identities. (see Childnet's cyberbullying guidance)

'Where an allegation of sexual harassment or sexual violence is progressing through the criminal justice system, schools… should understand the importance of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses.' *(Keeping children safe in education, Sept. 2026, p.135)*

Risk and Needs Assessment

Following a report of **sexual harassment**, the need for a risk assessment will be considered on a case-by-case basis. Following a report of **sexual violence**, the DSL will carry out an immediate risk and needs assessment. The DSL will consider the following:

- *the victim's safety and support needs,*
- *potential other victims,*

- *the alleged perpetrator(s),*
- *the wider school … community, including staff and students, and any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and*
- *the location and time of the incident, with steps to improve safety in that area.*
  (Keeping children safe in education, Sept. 2026, p.135)

All risk and needs assessments will be recorded, kept under constant review and used to inform ongoing safeguarding decisions. The school will engage with the Suffolk Safeguarding Partnership (SSP) and other external agencies (e.g. the police). In cases of **sexual violence,** risk assessments by social workers or other specialists are likely to be required and these will be used to inform the school's approach to supporting and protecting its students and updating the school's risk assessment.

Action following a report of HSB, sexual harassment and/or sexual violence

The school will consider such things as:

- the *'victim's'* views on how the investigation should be progressed. 'Victims' will be given as much control as possible though this will need to be balanced with the school's duty to protect others.
- the nature of the alleged incident.
- the ages and developmental stages of the children involved.
- any power imbalance between the children, e.g. age, maturity, disability, learning difficulty etc.
- if the incident was isolated or part of a sustained pattern. Sexual abuse can be accompanied by other forms of abuse.
- if the incident took place within an intimate personal relationship between peers
- if there are intra familial harms and support required for siblings.
- if there are ongoing risks to the *'victim'* or other children.
- if there are other related issues and wider context (contextual safeguarding).
- the proximity between *'perpetrator'* and *'victim'*, during the fact-finding stage.

All staff will always act in the best interests of the child and immediate action will be taken to support and protect the *'victim'*, the alleged *'perpetrator'* and any other affected children. When to inform the alleged *'perpetrator'* will be a matter for careful consideration. If referring to local authority children's social care, advice will be taken from them on this matter.

Managing the report:

The following options will be considered:

- The school may manage the incident internally through, for example, the use of the school meeting and some extra pastoral support provided by the house-parent or other members of staff. If appropriate, the school may inform the parents to provide further support.
- The school may decide that the children involved may benefit from some external support, perhaps in addition to support provided by the school and the children's parents. **Universal services and community based Early Help** play an important role in identifying emerging problems and providing support at an early stage and the school will work with the appropriate external agencies to provide the best level of support.

- Some children and families may require more targeted support than that offered at the universal and community based Early Help level. Thus, the school will work with targeted early help services (delivered through **Family Help**) to ensure the children receive the required support and protection.

[For more information on Universal services and community based Early Help, and Family Help - targeted Early Help, see page 22 above.]

- Where a child has been harmed, is at risk of harm or in imminent danger, the school will make a referral to local authority children's social care and follow subsequent advice/guidelines. This will almost certainly involve reporting to the police. Any delays in the criminal process, bail conditions and the conclusion of the criminal process will all need attention and management.

All concerns, discussions, decisions, and their rationale will be recorded in writing. Records will be reviewed so that potential patterns of inappropriate behaviour can be identified, and addressed, and relevant policies updated to reflect any lessons learnt. Where a pattern is identified, the school will also consider whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and what can be done to minimise the risk of it happening again.

Unsubstantiated, unfounded, false, or malicious reports

If a report is determined to be unsubstantiated, unfounded, false, or malicious, the school will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

Ongoing response

Safeguarding and supporting the *'victim'*

It is essential that the school does everything it can to ensure that the '*victim'* is protected from any subsequent bullying or harassment. Further, it is important to bear in mind that *'victims'* may not disclose everything immediately so opportunities for further communication must always be available. Bear in mind also that children's responses to having experienced sexual violence or sexual harassment will vary considerably. In some cases, it will be very obvious and in others hidden. As always, the needs and wishes of the *'victim'* will be paramount in the provision of any support, the length of any support, and naturally the type of support required will depend on the nature of incident, the *'victim's'* age, and the developmental stage. Support can include, but is not limited to:

- Family help and local authority children's social care
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs). They provide emotional and practical support for victims of sexual violence.
- Rape Crisis
- The Survivors Trust
- Children and young people's mental health services (CYPMHS/CAMHS). Suffolk CYPMHS/CAMHS is accessed primarily via Suffolk Emotional Wellbeing Hub. (See p.61 below)
- SARCS Sexual Assault Referral Centres offer medical, practical and emotional support.

- Childline
- Internet Watch Foundation – works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.

The *'victim'* may also wish to have a designated trusted adult at school such as a teacher or house-parent to talk about their needs. Finally, if the *'victim'* chooses to go to a new educational institution that institution will be made aware of any ongoing support needs.

In all cases, decisions made, and actions taken will be regularly reviewed so that potential patterns of inappropriate, problematic, or concerning behaviour can be identified and appropriate action taken. This may require, for example, policies to be updated to incorporate lessons learned.

Further, wider cultural issues within the school will be considered and if appropriate additional staff training and/or teaching time could be delivered to minimise the risk of the behaviour being repeated.

Safeguarding, supporting, and sanctioning the '*perpetrator*'

The *'perpetrator'* will also require support, the type of which will be dependent on a number of factors including age, developmental stage and the nature of the allegations. Support and sanctions will be considered on a case-by-case basis. It is possible that an alleged *'perpetrator'* will have unmet needs or may have been a *'victim'* of abuse themselves or been exposed to abusive practices and/or materials, as well as potentially posing a risk of harm to other children. Addressing any underlying trauma and the inappropriate behaviour, including sexism and misogyny, is very important in order to prevent future problematic behaviour.

Providing support and imposing sanctions are not mutually exclusive and can occur at the same time if necessary. Disciplinary action by the school can be taken whilst other investigations by the police and/or local authority children's social care are ongoing, however the school must ensure that it will not prejudice an investigation and/or any subsequent prosecution. Advice will be taken, as appropriate, from local authority children's social care, specialist sexual violence services and the police. The NSPCC provides free and independent advice about HSB (harmful sexual behaviour) and the Lucy Faithfull Foundation has developed an HSB toolkit which amongst other things, provides support, advice, information and links to organisations, resources etc.

Finally, if the alleged *'perpetrator'* chooses to go to another educational institution that institution will be made aware of any ongoing support needs and, where appropriate, potential risks to other children and staff.

Working with parents and carers

Where there has been a report of **sexual violence**, the school will, in most cases, engage with both the *victim's* and the alleged *perpetrator's* parents or carers unless there is reason to believe that doing so will put a child at further risk. In the case of **sexual harassment**, engaging with parents might not be appropriate. The school will consider very carefully what information is provided to the respective parents about the other child involved and when to do so. If appropriate, advice from outside agencies will be taken.

Discussions with the '*victim'* and the *'victim's'* parents will include arrangements to safeguard and support the '*victim'*, and how the report will be progressed. Discussions with the alleged

'*perpetrator'* and the alleged '*perpetrator's'* parents will include arrangements that are being put into place that impact on the alleged '*perpetrator'*, such as, for example, moving them out of classes with the '*victim'* and what this means for their education. The reason behind any decisions should be explained. Support for the alleged '*perpetrator'* should be discussed.

Finally, any discussions with parents or carers will take into account the fact that they may well find it difficult to accept the fact that their child has been a '*victim'* of a sexual assault or is alleged to have assaulted another child.

Safeguarding other children

Consideration will be given to providing support to children who have witnessed sexual violence, since witnessing such a thing is likely to be traumatic. Further, following any report of sexual harassment or sexual violence it is likely that some children will take "sides" and action will need to be taken to ensure both the '*victim'* and alleged '*perpetrator(s)'*, and any witnesses, are not being bullied or harassed. Social media is very likely to play a central role in the fallout from any incident or alleged incident and advice from specialist online safety organisations may be required to prevent any online harassment.

More detailed information and advice, including case studies, can be found in *Keeping children safe in education, Part 5 (Sept. 2026).*

See also, *Addressing child-on-child abuse: a resource for schools and colleges, (Farrer & Co, Sept 2024)*. Both documents are in the *Safeguarding Reference Documents* folder on the *Summerhill Drive.* **And**

Understanding sexualised behaviour in children | NSPCC Learning

(This includes an explanation of Hackett's sexualised behaviour continuum)

Further,

Suffolk County Council provides a consultation service for Harmful Sexual Behaviour (HSB). Go to:

https://www.suffolk.gov.uk/community-and-safety/communities/community-safety/suffolk-youth-justice-service/harmful-sexual-behaviour-hsb

Finally,

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour. Go to: https://shorespace.org.uk/

Also, go to:

https://www.lucyfaithfull.org.uk/shore/

Mental Health Concerns including self-harm and eating disorders / problems.

Introduction

The mental health and emotional wellbeing of children is arguably an issue that is causing an ever-increasing amount of concern, particularly for those who work in education and the health services. In early February 2024, the issue was described as 'an epidemic of unhappiness that is keeping children away from the classroom". *

The concept of mental health and emotional wellbeing has been at the heart of the school's philosophy since its foundation in 1921. A S Neill did not use the phrase 'mental health and emotional wellbeing', instead he wrote and spoke of 'happiness' by which Neill meant:

'an inner feeling of well-being, a sense of balance, a feeling of being contented with life.' (*'Summerhill' A.S. Neill. Pelican Books. 1968,* p. 308)

Neill also wrote and spoke of the terrible impact 'unhappiness' had on people's lives:

'The difficult child is the child who is unhappy. He is at war with himself; and in consequence, he is at war with the world……. All crimes, all hatred, all wars can be reduced to unhappiness.' (ibid, p.15)

Most importantly, Neill was clear that mental health and emotional wellbeing or 'happiness' *'can only exist when one feels free.'* (ibid, p.308) and that freedom has a therapeutic value; it serves as a safety valve:

'True freedom practised in community living, as in Summerhill seems to do for the many what psycho-analysis does for the individual. It releases what is hidden. It is a breath of fresh air blowing through the soul to cleanse it of self-hatred and hatred of others.' (p.260)

Freedom without licence and the empowerment this gives to children is usually all that is required to ensure that most of our students are able to manage the normal difficult thoughts and feelings that occur in life. However, when problems do arise, and extra support is required, the **equality** that exists at Summerhill ensures that the relationships between adults and children are open and trusting and this in turn leads to the children coming forward and speaking about issues that concern them or their friends. This fact, together with the small size of the Summerhill community and the school's RSHE programme ensure that mental health problems can be identified early and prevented from escalating.

Thus, to put it succinctly, **freedom** and **equality** are the twin pillars on which the school's approach to promoting and supporting mental health and wellbeing rests.

*[Dr Rosena Allin-Khan used the quote in a press statement accompanying a House of Commons debate on children's mental health that she led in late January / early February 2024]

Keeping children safe in education, (Sept 2026, p.58) states:

***All** staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal*

ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Naturally, only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, all staff at Summerhill have an important role to play by:

- *promoting good mental wellbeing and preventing the onset of mental illness,*
- *observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,*
- *ensuring early targeted support is provided, and*
- *liaison with/referral to specialist services where needed.* (ibid, p.60)

Early identification is key and because of the nature of the school all staff at Summerhill are in a good position to identify those students who may be struggling with their mental health in some way. Early warning signs 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. (ibid, p.19)

Further, it should be remembered that children with SEND and medical conditions (including allergy) are significantly more vulnerable to mental health problems and consequent issues with regular school attendance. If appropriate, and depending on the individual needs of the pupil, reasonable adjustments can be made and additional support from outside agencies such as Mental Health and Emotional Wellbeing support services, Family Help etc. can be obtained.

[For more information on medical conditions (including allergy) and mental health, see the school's *Medical Conditions Policy* and *Allergy and Anaphylaxis Policy.* On school attendance, including barriers to attendance, see *School Attendance Policy for Day Pupils.* For information on the school's RSHE programme, see *Relationships and Sex Education Policy and Curriculum Outline*]

Should a child's behaviour suggest that they may be experiencing a mental health problem, or be at risk of developing one, especially if it appears to be a safeguarding concern, it is imperative that this is reported to Andrew (who has received Youth MHFA training) **and** Zoë or Will immediately. As required, they will *ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education.* Furthermore, they will, if appropriate, inform the parents to support the child's wellbeing.

For more information on various mental health issues, **including signs and symptoms**, see *Youth MHFA Course Manual* in the staff room. It is recommended that all full-time, live-in staff read this manual.

See also:

- *Mental health and behaviour in schools (DfE, Nov. 2018)*
- *Promoting children and young people's mental health and wellbeing (DfE, March 2015, updated Nov 2023)*
- *Promoting and supporting mental health and wellbeing in schools and colleges (Gov.UK, June 2021, updated April 2026)*
- *Self-harm: assessment, management and preventing recurrence (NICE guidelines, Sept 2022)*
- *Looking after a child or young person's mental health (NHS)*

And

Hub of Hope at:

Mental Health Support Network provided by Chasing the Stigma | Hub of hope

Also, contact:

Suffolk Emotional Wellbeing Hub - 0345 600 2090 (Mon. to Fri. 8am – 7.30pm)

The Emotional Wellbeing Hub provides:

- a team of Emotional Wellbeing Practitioners for expert information, advice, and support.
- an online referral form for anyone concerned about a child or young person's emotional wellbeing and mental health. **Young people can also self-refer.**
- a consultation helpline for emotional wellbeing and mental health issues relating to children and young people.

Please note the Suffolk Emotional Wellbeing Hub is not a crisis helpline. If you or a child needs urgent crisis support, contact the First Response helpline on 0808 196 3494, a 24/7 helpline for anyone of any age experiencing mental health difficulties.

Alternatively,

Visit www.teenagementalhealth.co.uk or call 01473 411324.

Please note that in addition the Emotional Wellbeing Hub Service are working with Barnardo's to provide a new phoneline service to help guide families and young people to emotional wellbeing and mental health support.

The new phoneline service went live on Wednesday 23rd February, 2023. Thus, Barnardo's is now working with the Emotional Wellbeing Hub to help respond to families looking for general wellbeing information, which could be on common mental health issues like stress and anxiety, help with signposting to support services and useful resources, as well as supporting callers with some referrals into services.

Parents, carers, and young people can access the new Barnardo's phoneline service by calling the Emotional Wellbeing Hub helpline on 0345 600 2090 and pressing option 2.

For more information visit www.emotionalwellbeinggateway.org.uk

Also,

'**Soluna by Kooth'** (The new name for the Kooth online mental health service for children)

Support remains free, safe and human-led, including British Association for Counselling and Psychotherapy (BACP) accredited one-to-one chat. Pupils can now access the Kooth service via a new app on the SolunaByKooth website.

Existing users will receive guidance when logging in. For more details and resources, please contact epilcher@kooth.com.

Finally, and most importantly,

If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately. If a child needs help urgently for their mental health, but it is not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

For more information on action in emergencies etc., see the school's *First Aid, Accident and Emergency Policy.*

Further information – other specific safeguarding issues

Schools throughout the country are faced with a wide variety of safeguarding issues and there are now, in fact, more than twenty separate safeguarding topics. As has been said, the main safeguarding issues at Summerhill are related to online safety, sex and relationship concerns and, at times, mental health issues including self-harm and eating disorders / problems. However, that does not mean that the school will not face other safeguarding concerns, and it is important that **all staff** are aware of the existence of some of these other issues.

Important safeguarding issues include:

- **Radicalisation / Extremism / Terrorism**

The Prevent Duty requires all education providers *'to have due regard to the need to prevent people from becoming terrorists or supporting terrorism'.* This includes safeguarding children from extremist ideologies and radicalisation.

Keeping children safe in education (2026, p.166) states that:

Extremism is *the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs*

Radicalisation *is the process of a person legitimising support for, or use of, terrorist violence.*

Terrorism *is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.*

There is no single way of identifying whether a child is likely to be susceptible to radicalisation though there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). The Prevent Duty reinforces existing duties placed upon the school for keeping children safe. It aims to stop people becoming terrorists or supporting terrorism. It is considered to be 'the only long-term solution' to the threat from terrorism.

Prevent is about supporting and protecting those people that might be susceptible to radicalisation, ensuring that individuals are diverted away before any crime is committed.

Factors that may contribute to a child becoming susceptible to radicalisation:

- Poverty, disadvantage, or social exclusion.
- Impact of traumatic events of a global, national or personal nature.
- Unmet aspirations or under-achievement.
- Personal crisis or Identity crisis.
- Conflict with or rejection by peer, faith, social group or family.
- Victim of, or witness to, hate crime.
- Experiences of criminality.

- Peer pressure.
- Substance & alcohol misuse.
- Bullying.
- Internet & social media.

(Adapted from ACPO resources based on research by Cole & Cole 2009)

Behaviours of concern

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists.
- Loss of interest in other friends and activities not associated with extremist ideology, group, or cause.
- Possessing or accessing extremist materials or symbols through social networking sites.
- Using extremist narratives/language.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause.
- Attempts to recruit others to the group/cause.
- Using insulting or derogatory names for another group.
- Involvement in prejudice-related incidents.

Assessment of risk:

Although the school's *Prevent Duty Risk Assessment* concludes that the risk of radicalisation is extremely low, all staff are advised to maintain an attitude of **'it could happen here',** or indeed, **'it is happening here'** where safeguarding is concerned, and this includes a child becoming susceptible to radicalisation. Thus,

If you notice anything of concern, please inform Andrew and Zoë or Will.

Don't

- Dismiss the concern, or

- Attempt to mentor or counsel the child you are concerned about without passing on the information to Andrew **and** Zoë or Will.

If appropriate, Zoë or Andrew will seek advice from the national police Prevent advice line at **0800 011 3764**, or contact the Suffolk Safeguarding Partnership and Suffolk Constabulary Prevent Info

If there are any imminent safeguarding concerns, Customer First will also be contacted on 0808 800 4005.

If appropriate, after various checks and assessments, an action plan is put in place by **Channel** to deliver a support package.

What is Channel?

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. (Keeping children safe in education, Sept 2026, p.169)

Visiting Speakers

Summerhill very rarely has visiting speakers and usually on those rare occasions the speaker is known personally to at least one member of staff. However, in the highly unlikely event of a speaker, who is unknown to us, being invited to Summerhill, then the school will ensure that the speaker is vetted beforehand, for example by the use of a google search. Further, an assessment of the educational value of the visit will be made along with the age-appropriateness of what is going to be delivered. Whilst welcoming different insights and perspectives, visiting speakers will be reminded not to encourage any form of extremism or radicalisation. All visiting speakers will be supervised at all times by a member of staff whilst s/he is on the school premises.

Finally,

If you have concerns about **a member of staff,** please inform Zoë, or Will, or Henry.

If appropriate, Zoë will contact the LADO and submit the details at:

report extremism in education (https://report-extremism.education.gov.uk/)

For further information and / or guidance, see the following:

Summerhill School - The Prevent Duty Risk Assessment

Prevent Duty Guidance for England and Wales (December 2023)

Radicalisation and Extremism – Examples and Behavioural Traits (educateagainsthate.com)

The Prevent duty: practical guidance for designated safeguarding leads (Sept 2026)

Teaching online safety in school. (January 2023).

Keeping children safe in education (Sept 2026, pages 168 – 170)

The above documents can be found in the *Safeguarding Reference Documents* folder on the *Summerhill Drive.*

Also, resources can be found at:

Educate Against Hate (www.educateagainsthate.com)

The UK Safer Internet Centre (www.saferinternet.org.uk)

National Crime Agency's CEOP Education programme: (www.thinkuknow.co.uk)

Alternatively

Contact Suffolk MASH on 0345 6061499 or

Suffolk Police on 01473 613500 or dial 101 (the non-emergency number)

Finally,

Prevent duty training can be obtained by going to:

www.support-people-vulnerable-to-radicalisation.service.gov.uk/

• **Children who are absent from education** – children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a wide range of safeguarding issues including, but not limited to, neglect, child sexual and child criminal exploitation, particularly county lines, medical conditions including mental health problems, honour or faith-based abuse etc. It is important the school's response to persistently absent pupils and children missing education (CME) supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. Matters relating to this issue are primarily dealt with by the school secretary, working with Andrew, Zoe, Will and Henry. However, all full-time staff need to be aware of the school's attendance policy for day pupils and the procedures documented therein.

Further information on this topic can be found in *Working together to improve school attendance* (DfE July 2026) and *Children missing education: statutory guidance for local authorities and schools* (DfE Sept 2025).

• **Elective Home Education** – Matters relating to this issue are dealt with by the school secretary working with Andrew, Zoe, Will and Henry. However, the following should be noted:

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that local authorities, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers. (Keeping children safe in education, Sept 2026, p.59).

• **Child abduction and community safety incidents -** Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence it is important they are given practical advice on how to keep themselves safe. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

• **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery and where a potential victim of CCE or CSE is identified, a relevant child protection and modern slavery referral should be completed. See below for more information on Modern Slavery.

Some examples of CCE include children being forced or manipulated into transporting drugs or money through county lines (see below) working in cannabis factories, shoplifting, pickpocketing, stealing cars etc. Children who are criminally exploited should be treated as victims as it is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them. **CCE** does not always involve physical contact; it can occur through the use of technology.

CSE is a form of child sexual abuse. Sexual abuse may not only involve physical contact, but it may also include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities etc. CSE may even happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Factors that make a child vulnerable to exploitation include age, gender, sexual identity, cognitive ability, physical or learning disability or being neurodivergent, communication ability etc. Indicators of both **CSE** and **CCE** include children having unexplained gifts, money etc., misusing drugs and alcohol, going missing from school and home for periods of time and suffering from changes in emotional well-being.

See DfE guidance: Child sexual exploitation: guide for practitioners for further information.

• **County Lines**. County lines is a term used to describe organised criminal networks involved in exporting illegal drugs into one or more areas within the UK, using dedicated mobile phone lines. Exploitation is an integral part of the county lines model with children exploited to move drugs and money between locations. Offenders will often use coercion, intimidation, and violence (including sexual violence) to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools and can easily be trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence towards victims (and their families) if they attempt to leave the county lines network.

As county lines is a form of criminal exploitation, a First Responder who identifies any potential victim of county lines exploitation should complete the relevant child protection and modern slavery referrals as detailed in the Modern Slavery statutory guidance.

'County Lines is the biggest threat facing Suffolk at present without question.'

• **Serious Violence –** Keeping children safe in education (Sept. 2026, p.20) states:

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. ***Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action.*** *Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.*

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school).

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital.

There are a number of indicators, which may signal children are at risk from, or are involved in committing serious violence. These may include changes in friendships, in attendance / educational performance, wellbeing or signs of self-harm or unexplained gifts or new possessions etc.

The likelihood of involvement in serious violence may be increased by factors such as being male, having been suspended or excluded from school, experienced child maltreatment, involved in offending, such as theft or robbery, having used drugs or alcohol in early adolescence, and having previously been a victim or previously perpetrated violence.

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance.

• **Children and the court system** – Children are sometimes involved in the criminal court system or the family courts. Any involvement in the court system can be very stressful for children.

• **Children with family members in prison** – These children are at risk of a range of negative consequences. For example, they are more likely to be absent from school (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. They need tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability.

• **Homelessness -** Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Children's Wellbeing and Schools Act places a new duty on local housing authorities in England to notify educational institutions, health visiting services and general medical practices, when a child is placed in temporary accommodation.

This notification does not replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm.

• **Cybercrime -** criminal activity committed using computers and/or the internet. Cybercrime is one of the most significant and rapidly evolving threats within the UK. Offences under the Computer Misuse Act 1990 (CMA) have risen substantially.

Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead, should consider referring into the **Cyber Choices** programme; a nationwide preventative programme.

• **Modern Slavery and the National Referral Mechanism –** Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

The National Referral Mechanism is the system used within the UK to support potential victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery is child abuse and relevant child protection procedures must be followed if modern slavery or trafficking is suspected.

Information on the signs that someone may be a victim of exploitation and modern slavery, the support available to victims and how to refer them to the NRM is available in statutory guidance Modern slavery: how to identify and support victims - GOV.UK.

Children who are referred into the NRM in England and Wales may also have access to an Independent Child Trafficking Guardian (ICTG)1. ICTGs provide advocacy for children and help to promote and support their recovery.

The following website will tell you how Suffolk County Council address the issue of modern slavery and how to report any concerns:

https://www.suffolk.gov.uk/community-and-safety/communities/community-safety/modern-slavery

Further, the Unseen App shows how to recognise the signs of modern slavery and report it:

https://www.unseenuk.org/about-modern-slavery/download-the-app/#Unseen%20App

• **Domestic abuse** – The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as '*victims*' in their own right, if they see, hear or experience the effects of abuse. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to psychological, physical, sexual, financial, or emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. They may suffer domestic abuse in their own intimate relationships (teenage relational abuse). Experiencing domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

Domestic abuse is one of the most prevalent forms of abuse, with Women's Aid estimating that 160,000 children are currently living in households where domestic abuse is taking place. This is likely to be an underestimate, however, with much abuse remaining hidden and not coming to the attention of services.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

NSPCC - UK domestic-abuse Signs Symptoms Effects

Further, **Operation Encompass** operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. From November 7, 2025, the police have a statutory duty to notify a child's educational setting when they attend a domestic abuse incident in a child's home, including children who were not physically present at the incident. This can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents.

Operation Encompass notifications

Operation Encompass involves the sharing of personal and sensitive information about children and families. It is vital that all participants comply with the data protection laws.

Police forces and educational settings are responsible for deciding how and where information about incidents and notifications are made. They must ensure it remains confidential, is held securely, and adheres to the requirements of the data protection laws.

The designated safeguarding lead is responsible for leading on all safeguarding and child

protection matters within an educational setting. They are likely to be the Key Adult for Operation Encompass notifications and are responsible for making safeguarding referrals to appropriate agencies, maintaining up-to-date safeguarding policies and training, overseeing record-keeping, and liaising with families where appropriate.

Note: Operation Encompass notifications must not include:

- information or reference to sexual offences disclosed at the domestic abuse incident. This must not be disclosed in the notification. Under the Sexual Offences (Amendment) Act 1992, anonymity for victims of sexual offences must be preserved.

The Operation Encompass charity provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8.00 to 13.00, Monday to Friday on 0204 513 9990.

• **Honour or faith-based abuse (HBA) including female genital mutilation and forced marriage** – HBA encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing. Since February 2023, it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Female Genital Mutilation (FGM) – if a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** personally report this to the police. Further, they should discuss the case with the DSL and involve children's social care as appropriate. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed by informing Andrew **and** Zoë or Will.

• **Private Fostering** – a private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. The school has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

More information about these and other issues, advice and support can be found on pages 157 -182 in *Keeping children safe in education (Sept. 2026)*

See also the *Safeguarding Reference Documents* folder on the *Summerhill Drive.*

Alternatively

Visit the Suffolk Safeguarding Partnership (SSP) website at: www.suffolksp.org.uk.

Some important telephone numbers:

Children's Services:

Customer First – Children's Social Care (Urgent Safeguarding)

Telephone: 0808 800 4005

Local Authority Designated Officer(s) (LADO)

Telephone: 0300 123 2044

E-mail: LADO@suffolk.gov.uk

Integrated Front Door (previously MASH - Multi Agency Safeguarding Hub)

Professional Consultation Line. Telephone: 0345 606 1499

Monday – Thursday: 9.00 to 5.00 pm. Friday: 9.00 to 4.25 pm.

Please note that the consultation line is not a point of referral

To make a referral, go to Suffolk Safeguarding Partnership at:

https://www.suffolksp.org.uk/concerned

Suffolk Police: Telephone: 01473 613500

Police – Non-Emergency: Telephone: 101

IN AN EMERGENCY DIAL 999

Remember:

- **Anyone can make a referral.**
- **Always act in the best interests of the child**
- **If you have any questions or concerns about safeguarding children, you can ask Zoë, Will or Andrew at any time, day, or night.**

Appendices

Appendix i

Summerhill and its attitude to sex and sexuality

Introduction

At Summerhill we have a very 'open' attitude to our bodies, nudity and bodily functions, and strongly separate nudity from sexuality. We pride ourselves on being prepared to talk about anything. As Neill wrote: 'At Summerhill, nothing is unmentionable, and no one is shockable.' Having an 'open', unrepressed, approving attitude to these things is very important for a child's emotional development. This positive attitude to our bodies is becoming ever more important as we live in a society obsessed with body image; a society in which most people, especially teenagers, don't feel positive about the way they look and often engage in forms of self-harm because of it. (Summerhill General Policy Statement (Community Life), p.3/4)

This guidance is informed by the school's philosophy, English law and is based on the core principle that the welfare of the young person is paramount and that we will always act in the best interests of the child.

The law

All staff should be aware of the following aspects of the law:

'Under the Sexual Offences Act 2003, children under the age of 13 are considered of insufficient age to give consent to sexual activity. Any offence under the Sexual Offences Act 2003 involving a child under 13 is very serious and must be taken to indicate a risk of maltreatment or abuse.'

'The Sexual Offences Act 2003 reinforces the fact that the legal age of consent remains at 16. It is acknowledged that some young people under 16 may be involved in consensual sexual relationships and it is accepted that it is not in the public interest to prosecute such young people if they are of the same or similar age and understanding…..' (Working with Sexually Active Young People Under the Age of 18. SSCB. August 2017, p.5)

Although it is legal for children over the age of 16 to have sexual intercourse, it is of course not allowed whilst they are at school.

Policy

At Summerhill a child's sexuality is considered natural. We feel that it is normal for children to explore their own sexuality, and it is school policy to be supportive and to offer advice and information whenever it is needed.

The school aims for children to feel comfortable and supported so that if sexual problems arise, they will be able to talk openly to the adults and seek help.

All staff at Summerhill are expected to be open, honest, and professional when talking to pupils about sex, whatever their ages. We need to take an active role with new couples to ensure that they are fully informed on matters of contraception and sexual health. Summerhill is not alone in assisting children with contraception if it is thought necessary and staff are

expected to help children seek medical advice if needed. Parents may be informed if we have concerns, though we will try to comply with a child's wish for confidentiality when possible.

Zoë (as principal), or Will (as DDSL), **and** Andrew (as DSL) need to be informed, **at the earliest opportunity,** if you observe a new couple forming or any problems/issues emerging from an established relationship. Where appropriate, couples will be reminded of the law, especially regarding age differences and/or power imbalances, and the existence of the Sex Offenders Register.

All staff should recognize the safeguarding *'risks associated with children sharing overnight accommodation'.* (*National minimum standards for boarding schools, May 2026, p.12*) and, as has been said above, be alert to inappropriate pupil relationships and the potential for child-on-child abuse. In order to determine whether the relationship presents a risk to the young person, a number of factors must be considered. Of particular importance is the presence of any *'power imbalances which can occur through differences in size, age, and development. The larger the age gap between those involved the greater the need to assess the power balance…..... Gender, sexuality, race, and levels of sexual knowledge may also be used to exert power.' (Working with Sexually Active Young People Under the Age of 18. SSCB. August 2017, p.7)*

Whatever your personal views on children's sexuality you will be expected to follow the philosophy of the school on these matters. We believe that sex is not a taboo subject and that children should be able to talk about it when they feel ready. Books are available in houseparents' rooms and the library.

Finally, Summerhill's opinion on the use of pornography is very clear; an opinion that has been conveyed by Zoë to all parents in an email dated September 21, 2021:

'All his life, my father spoke and wrote about the importance of children and adolescents developing a natural and healthy attitude towards sex and sexuality. Pornography, its content, and the viewing of it, is the very ***opposite*** *of his ideas. It is not a question of morality but simply that viewing pornography at an early age can lead, among other things, to children developing very unrealistic and distorted views about sex and relationships. Further, by comparing themselves to the 'porn stars', boys can become concerned about 'sexual performance' and girls about 'body image'. At Summerhill we always try to offer a calm, balanced and honest attitude to sex.'*

All students are made aware of the contents of this policy via the regular, 'formal', age-appropriate discussions on sex and relationships. In addition, the information is conveyed via the numerous 'informal', small group, or one-on-one conversations that are held on this topic at almost any time, day, or night, in almost any area of the school.

Note: It is strongly recommended that all full-time staff read *Working with Sexually Active Young People Under the Age of 18. (SSCB. August 2017).* A copy of this document is to be found in the *Safeguarding Reference Documents* on the *Summerhill Drive.* See also *Gillick competency and Fraser guidelines (NSPCC Learning)*

Note: The Suffolk Sexual Health Service (SSHS) is now in operation. SSHS works in partnership with pharmacies and GPs to deliver services such as STI testing and treatment and contraception. See https://suffolksexualhealthservice.org.uk/ or call 0300 303 9982.

Appendix ii

Searching and Confiscation

Searching and confiscation carried out in the school is done so on the authority of the school meeting and as defined by school laws.

Searching

Searches of individuals and their possessions are carried out by the Investigation Committee. The Investigation Committee, an ongoing, long-term committee, is elected by the school community and, as such, is given the authority to question individuals and then, if necessary, carry out searches and confiscate items, including mobile phones. Any member of the community, or the meeting, may request that the Investigation Committee perform an investigation.

The individual under investigation is, whenever possible, informed that there is to be a search of their possessions, and they are able to be present. All searches, of possessions, or the person, are conducted by two, or more, members of the investigation committee. A person being searched will be asked to turn out their pockets and remove any outer items of clothing.

Searches are always conducted with sensitivity to the individual and if any party involved in the process feels uncomfortable with how it is being conducted, ombudsmen may become involved, and a case may be brought to the school meeting.

Confiscation

Confiscations may be carried out by the Investigation Committee, Ombudsmen, Beddies Officers (relating to bedtimes), and the Screening Police (if someone breaks a screen ban) and, on occasion, an individual community member who is authorised to do so by the meeting.

Types of confiscation

Short term: This includes items being misused in accordance with the school laws and philosophy, e.g. torches, phones, sticks. These items are kept until the next meeting unless the confiscation is done by a beddies officer who can only confiscate an item (usually a mobile phone) until the next morning. The meeting will decide if a period of confiscation is to be extended, or if the item is to be returned to the owner.

Long term: This includes items not allowed by school law, sometimes age specific, e.g. lighters, penknives, computer games, bb guns. These items are kept in the school office and may be collected at end of term.

Permanent: This includes illegal items and those banned from the school, e.g. alcohol, tobacco, fireworks, drugs. These items are not returned and are disposed of by the school.

Stolen items: These items are returned to their rightful owner.

Under exceptional circumstances, the School Principal may act without the authority of the meeting in relation to suspected possession of illegal items. Any searching and confiscation is done so with regard to the law and to the rights of the individual. The Principal would not search a child and would seek help from the investigation committee if one was required.

For more information on this topic, see *Searching, screening and confiscation: advice for schools* (DfE. July 2022) in the *Safeguarding Reference Documents* folder on the *Summerhill Drive.*

For more information on the Investigation Committee, see the school's *Recognised Roles' and Committees' Duties, Responsibilities and Powers* (July 2026)

Appendix iii

Restrictive interventions, including the use of reasonable force.

At Summerhill, restrictive interventions are never used. However, in the highly unlikely event of one being required the incident would be considered 'significant' and would be reported **immediately** to Zoe, Will, Henry **and** Andrew. Further, the incident would be brought to the attention of the school meeting by calling a special meeting if necessary.

In addition, on the day of the incident, recording procedures, in line with statutory guidance, must be followed by the staff member (or staff members) most directly involved.

For more information, see the school's *Restrictive Interventions Policy*

Appendix iv

School Trips

School trips are risk assessed on a case-by-case basis and the school's *Safeguarding and Child Protection Policy* always forms an important part of any school trip risk assessment. This includes any arrangements made by the school for the care and accommodation of Summerhill students with host families (known as homestays) either in the UK or abroad.

It also includes 'local school trips' in the school vehicles such as a trip with the Half-term, or EOT, Bar Committee to Tesco's in Saxmundham and trips to Ipswich Hospital.

When considering a new activity, firstly consult with Amy Readhead-Higgins (Health and Safety Coordinator), for advice and assistance. There are the frequently used risk assessments, and the most recent trips, on the staff Google Drive. Sometimes risk assessments can be modified by a staff member, if the trip is very similar to the current risk assessment. The risk assessment needs to be taken to the school office **before** the trip takes place.

All staff are aware that the school's *Safeguarding and Child Protection Policy* applies at all times, both in and out of school.

For more information on school trips, risk assessments etc., see *Transport Policy* and *Risk Assessments for Trips* file and the *Risk Assessment Policy.*

For information on school trips involving children staying with host families (homestay), see *Keeping children safe in education* (Sept 2026, pages 101 – 102)

Work Experience

If a Summerhill student, aged 16 or over, wishes to do some work experience, the school will ensure that the placement provider has policies and procedures in place to protect the child from harm.

In addition, the following should be noted:

Schools … are not able to request that a work experience provider obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience. (Keeping children safe in education (Sept 2026, p. 101)

For more information on adults who supervise children on work experience, see *Keeping children safe in education* (Sept 2026, pages 100 – 101) and the school's *Recruitment and Selection Policy*

For information on Health and safety expectations for employers hosting young people on work experience, go to:

https://www.hse.gov.uk/young-workers/employer/work-experience.htm

Appendix v

School Attendance Policy for Day Pupils

Summerhill School recognises that good attendance is essential for day pupils to gain the greatest benefit from Summerhill's unique education system. The school also recognises the connections between attendance, emotional and intellectual development, safeguarding and wellbeing. Further, the school understands '*good attendance begins with school being somewhere pupils want to be' (Working together to improve school attendance, July 2026, p.8)* which is why A S Neill founded the school with *'…... one main idea:* ***to make the school fit the child*** *– instead of making the child fit the school.' ('Summerhill' A.S. Neill. Pelican Books. 1968, p.20)*

The statutory guidance *Working together to improve school attendance (July 2026)* states:

Schools must take the attendance register at the start of each morning session and once during each afternoon session of every school day, at the same time for all registered pupils… On each occasion, schools must record whether each registered pupil is physically present in school and if not, the reason for absence using the appropriate national attendance and absence codes …. (p.18)

Since poor school attendance may be considered a safeguarding issue, it is Summerhill School's Designated Safeguarding Lead, Andrew Sturman, who takes on the role of **Senior Attendance Champion.** This means that, among other things, he will regularly monitor school attendance.

Summerhill School is committed to having a robust attendance policy and system in place and it is Andrew, Will, Henry, and Zoë's responsibility, working with Lynn, and others, both inside and outside the school, to ensure that all Summerhill children receive the very best possible education.

For more information, see *School Attendance Policy for Day Pupils* in the staff handbook and *Working together to improve school attendance (2026)* in *Reference Documents* on the Summerhill Drive.

Appendix vi

What we mean by 'harmful sexual behaviour', 'sexual violence' and 'sexual harassment', 'sexual violence' and other related matters

Keeping children safe in education, (Sept 2026, p. 126 – 132) states:

Harmful sexual behaviour (HSB)

The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies ***to behaviour occurring online, face-to-face, or both****. HSB should always be considered within a child protection context.*

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning.

When assessing HSB, the ages and developmental stage of the children involved is critical. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g., due to a disability or physical size. Advice on responding to children who display sexualised behaviour is available in Responding to children who display sexualised behaviour. Links to confidential specialist support are listed in Annex A.

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This knowledge could form part of their safeguarding training and support preventative education, help implement effective safeguarding policies including a child protection policy and embed a whole school or college approach to safeguarding.

HSB can, in some cases, progress on a 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 harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school or college. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can:

- *violate a child's dignity,*
- *make them feel intimidated, degraded or humiliated, and*
- *create a hostile, offensive or sexualised environment.*

Whilst not intended to be an exhaustive list, examples of sexual harassment can include:

• sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names,

• sexual "jokes" or taunting,

• physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes. Schools and colleges should assess when such behaviour crosses into sexual violence – it is important to talk to and consider the experience of the victim
,
•displaying pictures, photos or drawings of a sexual nature,

• upskirting (this is a criminal offence), and

• online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence. This may include:

• consensual and non-consensual making or sharing of nudes or semi-nudes. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges,

• sharing of unwanted explicit content
,
• sexualised online bullying
,
• unwanted sexual comments and messages, including, on social media,

• sexual exploitation; coercion and threats, and

• coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that schools and colleges consider sexual harassment in broad terms. If left unchallenged, it can foster a culture that normalises inappropriate behaviour and increases the risk of leading to sexual violence.

Sexual violence

Schools and colleges should be aware that child-on-child sexual violence can and ***does occur, both inside and outside of school/college.***

In this guidance, sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 as described below:

Rape: *A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents.*

Assault by penetration: *A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the*

penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual assault: *A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).*

Causing someone to engage in sexual activity without consent: *A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).*

What consent is: *Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:*

- *a child under the age of 13 can never consent to any sexual activity,*

- *the age of consent is 16, and*

- *sexual intercourse without consent is rape.*

For further guidance refer to Rape Crisis England & Wales - Sexual consent

Preventing abuse

Effective safeguarding is demonstrated when schools and colleges are clear, in advance, about what local processes are in place and available support for incidents involving HSB, sexual harassment or sexual violence. It is important to review this information on a regular basis to ensure it is up to date. As such:

- *if required, the designated safeguarding lead (or a deputy) should discuss the local response with police and local authority children's social care to inform the school or college's policies (particularly the child protection policy) and response, and*

- *the designated safeguarding lead (and their deputies) should be familiar with local specialist support services for all children involved (including victims and alleged perpetrators) and know how to access them when needed.*

Further details on specialist support and interventions can be found in Annex A.

Support for schools and colleges

Schools and colleges should not feel isolated when addressing incidents of HSB, sexual harassment and sexual violence. Support is available from a range of agencies and organisations.

Local authority children's social care and the police are key partners, especially where a crime may have been committed. Referrals to the police often follow a referral to local authority children's social care.

The designated safeguarding lead (or a deputy) should lead the school's …. response and should be familiar with the local referral process….. Schools …. may also find the following resources helpful:

• ***National Crime Agency's*** *CEOP Safety Centre offers support and reporting mechanisms for online sexual abuse.*

• ***NSPCC*** *helpline provides expert advice for professionals via 0808 800 5000 or help@nspcc.org.uk.*

• ***Rape Crisis*** *and* ***The Survivors Trust*** *provide specialist support for victims of sexual violence.*

• ***The Anti-Bullying Alliance*** *provides guidance for schools on Sexual and sexist bullying.*

Online incidents of HSB, sexual harassment and sexual violence can be complex, often involving widespread abuse or harm on multiple social media platforms and repeated victimisation. Support is available from:

• ***UK Safer Internet Centre*** *provides an online safety helpline for professionals at 0344 381 4772 or helpline@saferinternet.org.uk.*

• ***Childline/IWF*** *provides a free tool, Report Remove, for children to report nude or sexual images and/or videos of themselves that they think might have been shared online.*

• ***UKCIS*** *provides: Advice for education settings working with children and young people on handling reports of children sharing non-consensual self-generated intimate images and/or videos.*

• ***National Crime Agency's*** *CEOP Education Programme provides resources for professional's and parents and carers on protecting children and young people from online child sexual abuse.*

• ***LGfL*** *provide education materials via 'Undressed' on how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.*

Additional sources of support are listed in Annex A.

Appendix vii

Human Rights Act 1998

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

• Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)

• Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity

• Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and

• Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act).

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils or students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges, in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain particular protected characteristics in order to meet their specific need. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. There is also a duty to make reasonable adjustments for disabled children and young people.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the Act can be found at Equality Act 2010: advice for schools.GOV.UK, it may also be useful for colleges. For further information see Guidance I EHRC (equalityhumanrights.com). (Keeping children safe in education, Sept.2026, p.30 / 31)

Sport (and the Equality Act)

Keeping children safe in education (Sept. p.31) states:

As children get older, some sports are typically taught and played in single sex groups. The Equality Act 2010 contains an exception in relation to single-sex sport. It applies to participation in any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This means that schools and colleges can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex.

Sport is not taught at Summerhill.

Appendix viii

Regulations and safeguarding requirements relating to school premises
(Keeping children safe in education (Sept 2026, p. 32/34)

Toilets, Changing Rooms and Showers

All toilet and washing areas in the school can be used by either sex, or by staff. (Summerhill General Policy Statement (Community Life), p.2)

For more detailed information on the school's living arrangements, see *Summerhill General Policy Statement (Community Life)* and the introduction (above, p. 4-7) to this policy.

Appendix ix

Role of the designated safeguarding lead

*'Governing bodies and proprietors should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.*

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or a deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Microsoft Teams or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out-of-hour/out of term activities.

To ensure continuity of safeguarding responsibilities, schools should implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. Schools and colleges have the flexibility and discretion in how these arrangements operate, provided safeguarding responsibilities remain appropriately covered. It would be good practice that, whenever the DSL is unavailable, there is a clear reliable and known arrangement in place so that concerns can be raised. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored and acted upon without delay.

Manage referrals

The designated safeguarding lead is expected to refer cases:

• of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care,

• to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme,

• where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and

• where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

• act as a source of support, advice and expertise for all staff,

• act as a point of contact with the safeguarding partners,

• liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the statutory guidance – PACE Code C 2019,

• as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member,

• liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically,

• liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health,

• promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances, and

• work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the

impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

a) ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and

b) supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information.

Records should include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice as set out in Parts one and two of this guidance.

Appropriate arrangements should be in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Where child protection files are transferred, the exporting school or college should include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs.

Particular care should be taken to distinguish between current safeguarding concerns and historic information, ensuring that past issues are presented with appropriate context. For example, where a file contains extensive historical information, a concise summary of current risk and relevant context is likely to support more effective safeguarding than the transfer of unstructured records alone.

Receiving schools and colleges should ensure that safeguarding information is reviewed by an appropriately trained member of staff so that key risks and needs are clearly understood. Safeguarding information should be used to support, not disadvantage, the child.

Where the receiving school or college considers that safeguarding information is unclear or incomplete, it should seek clarification where necessary to support effective safeguarding.

They should also ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named person with oversight for SEND in colleges, are aware as required. It will then be for the DSL to consider what other information should be shared with other relevant staff and when this should be shared.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. It would be good practice for a conversation to take place at the appropriate and relevant points between the designated safeguarding leads at both settings, where there are issues or concerns to ensure information is being actively considered and acted upon.

Raising Awareness

The designated safeguarding lead should:

• *ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff,*

• *ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this,*

• *ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this,*

• *link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and*

• *help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.*

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

• understand the assessment process for providing family help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements,

• have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so,

• understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children,

• understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes,

• are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers,

• understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners,

• understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation,

• are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school or college,

• can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online,

• obtain access to resources and attend any relevant or refresher training courses, and

• encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or

simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead (and deputies) in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

• ensure that staff are supported during the referrals processes; and

• support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

• encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,

• understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead (and deputies) should be equipped to:

• understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners,

• understand relevant data protection laws, and

• be able *to keep detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.' (Keeping children safe in education, Sept. 2026, Annex B, pages 183 – 190)*

Document history

Reviewed and updated January 2021 / March 2021 / April 2021 / September 2021 / January 2022 / February 2022 / April 2022 / May 2022 / September 2022 / January 2023 / April 2023 / September 2023 / September 2024 / September 2025 / January 2026 / April 2026 / September 2026

Next review due September 2027