



Defence
Children
Services

DCS Directive 3.2.1

Safeguarding Children and Young People in DCS Schools and Settings

Sept 2025 v3.0

General

Authorisation	Head DCS
Senior Responsible Owner	AH Specialist Support Services
Point of Contact	DCS Safeguarding and Allegations Lead
Review Date	September 2026
Related Policy/Guidance	DfE Keeping Children Safe in Education (2025)
	DfE Early Years Foundation Stage Statutory Framework (2025)
	DfE Working Together to Safeguard Children
	DfE Working together to improve school attendance (2024)
	DfE The Prevent Duty: Safeguarding Learners Vulnerable to radicalisation
	JSP 342 Education of Service Children Overseas
	JSP 345 Applying Prevent Within Defence
	JSP 740 MOD Acceptable Use Policy for Information and Communications Technology and Services
	JSP 770 Armed Forces Welfare Support Policy
	JSP 834 Volume 1 – Safeguarding Children
	JSP 893 Safer Recruitment and Employment
	JSP 913 Whole Force Policy on Domestic Abuse

Introduction

1. This Policy Directive¹ contains MOD policy, UK legislation and DfE Guidance for safeguarding children and delivers direction that must be followed in accordance with statute or policy mandated by Defence. It is the intention that it is reviewed annually or in response to higher policy or legislative changes.
2. The owner of this Policy Directive is the Head of Defence Children Services (Hd DCS). For further information or advice on any aspect of this publication or to provide feedback on content, please contact the DCS Safeguarding Team by emailing: RC-DCS-HQ-SAFE@mod.gov.uk

¹ Consideration has been given as to whether this Policy Directive complies with the Public Sector Equality Duty, and it has been concluded that the Duty has been complied with.

Aim

3. The aim of this Policy Directive is to provide DCS HQ and Schools and Settings with clear direction to ensure compliance with UK safeguarding legislation and MOD policy.

Purpose

4. The primary purpose of this Policy Directive is to lay out the systems and responsibilities for safeguarding children and young people attending DCS schools and settings and enable staff to fulfil their professional duty, to safeguard and promote the welfare of children, as outlined within the Department for Education (DfE) Guidance; Keeping Children Safe in Education 2025 (KCSIE), issued under Section 175 of the Education Act 2002.

5. DCS works in accordance with JSP 834 Volume 1 Safeguarding Children which states all agencies who work directly with children should have in place effective safeguarding and child protection procedures.

Scope

6. This Policy Directive applies to all staff, including those volunteering or working for or on behalf of DCS HQ, its Schools and Settings and specifically identifies the operational requirements and responsibilities on all individuals (in line with their contract of employment or other contractual arrangement). It also applies to extended school, wrap around care and off-site activities.

Legislative Framework

7. In DCS locations overseas, the Chain of Command (CofC) can give effect to some requirements by way of standing orders for the safeguarding and welfare of children for whom the MOD has assumed responsibility. These standing orders will only apply to persons subject to Service law or civilians subject to Service discipline.

8. DCS, so far as possible, adopts the requirements in the legislation mandated by Defence, whilst recognising that these requirements have no legal force in overseas host nations. DCS Schools and Settings must accept the duties, wherever practicably possible, as follows:

9. Section 175 of the Education Act 2002

10. Section 40 of the Childcare Act 2006

11. Section 26 of the Counter-Terrorism and Security Act 2015

a. Section 74 of the Serious Crime Act 2015 (to report to the police where they discover that Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18).

12. Disqualification under the Childcare Act 2006

a. The Equality Act 2010 and The Public Sector Equality Duty

b. The Human Rights Act 1998

- c. Working Together to Safeguard Children
- d. KCSIE

13. The National Guidance for Child Protection in Scotland (Queen Victoria School)

Definitions

14. For the purpose of this document, DCS uses the definitions and descriptions contained in legislation, policy and regulations that apply in England.

15. Children (defined as those up to the age of 18) have a right to be heard and have their wishes and feelings considered. All children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal right to protection.

16. Not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. DCS is prepared to use the term that a child feels most comfortable with.

17. Child Protection refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

18. Safeguarding and promoting the welfare of children is defined as:

- a. Providing help and support to meet the needs of children as soon as problems emerge
- b. Protecting children from maltreatment, both within and outside the home, including online
- c. Preventing the impairment of children's mental and physical health or development
- d. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- e. Taking action to enable all children to achieve the best outcomes

Leadership Responsibilities

19. Head DCS has overall responsibility for the delivery of effective, child centred and coordinated approach to safeguarding practice:

- a. Delegating all aspects of operational safeguarding management to Assistant Head DCS Specialist Support Services (SSS).
- b. Bringing to the attention of Regional Command any significant case, theme or challenge that might affect DCS, its employees or children.
- c. Ensuring sufficient resources are made available to ensure training and operational compliance.

- d. Promoting and maintaining a vigilant safeguarding culture across DCS and all its activities.
 - e. Represent DCS at the Defence Safeguarding Partnership Board (DSPB).
20. The Head Teacher or Setting Manager where practicably possible, should:
- a. Comply with the duties outlined in KCSIE and/or EYFS Statutory Framework
 - b. Put systems in place for children to confidently report abuse.
 - c. Encourage staff to demonstrate professional curiosity and challenge.
 - d. Ensure this Directive and related procedures are understood and implemented by all staff, embedded within induction processes and communicated outwardly to stakeholders.
 - e. Ensure that all staff have read and understood Part 1 of KCSIE and this Directive.
21. Complete and submit the annual Section 175 Assessment and provide documentary evidence of as required, with the support of the School Governing Committee Safeguarding member.
- a. Ensure that the Designated Safeguarding Lead (DSL) has appropriate time, training and resources to fulfil the role and that adequate cover in the DSL's absence is provided.
 - b. Where it is required, ensure the relevant staffing ratios and staff qualification requirements are met.
 - c. Ensure that there are effective arrangements in place for dealing with serious cases or risk to life, in line with JSP 834 and DCS requirements.
 - d. Where a person is dismissed, left due to risk/harm to a child or identified through allegations process as behaving in a way unsuitable to work in a position of trust, inform the Disclosure and Barring Service (DBS) and Teachers Regulation Agency (TRA).
 - e. Ensure that each child in an EYFS setting is assigned a key person who is responsible for meeting the individual needs of the child in their care.
22. Both Schools and Settings must appoint a DSL of the appropriate level of authority and experience, whose duties are explicit in the post holder job description. The DSL is responsible for:
- a. effective and vigilant safeguarding and child protection practice, including online safety and training.
 - b. providing advice and support to other staff, taking an active role in strategy discussions and inter-agency meetings, and/or supporting other staff to do so. As well as contributing to the assessment of children in line with DfE 'Working Together to Safeguard Children' guidance.
 - c. referring cases of suspected abuse and neglect to the contracted social work provider and supporting staff who make referrals. Understanding how the School or

Setting plays a crucial role in the systems laid out in DfE Working Together to Safeguard Children.

- d. supporting staff where there is a radicalisation concern or a referral to the relevant agencies.
- e. keeping detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping and the relevant data protection legislation regulations (UK GDPR). Having due regard for the Data Protection Act 2018 (DPA 18).
- f. modelling and embedding a child-centred, co-ordinated approach to all measures the School or Setting has put in place to safeguard children.
- g. bringing the attention of contractors and visitors to the School or Setting, to the safeguarding arrangements, expectations for behaviour and how to report concerns.
- h. following local procedures laid out by the Local Safeguarding Partnership (LSPB), attending inter-agency, meetings and/or support other staff to do so.
- i. ensuring Deputy Designated Safeguarding Leads (DDSL) are trained to the same standard of the DSL and have the authority, confidence and capacity to take on delegated duties when necessary.
- j. ensuring a copy of this Policy Directive and Part 1 of KCSIE/EYFS Statutory Framework is provided to all staff at their induction and then yearly thereafter.
- k. providing regular safeguarding and child protection updates, including online safety (for example, via email, e-bulletins, staff meetings) as required to ensure all staff have the skills and knowledge to safeguard children effectively.
- l. informing the contracted social work provider when made aware of any child in need of protection arriving or due to arrive in their area of responsibility.
- m. making referrals to the DCS Overseas Educational Supportability Team (OEST) (in overseas locations where emerging safeguarding needs occur that cannot be sufficiently supported.)
- n. understanding the assessment process for providing Early Help and intervention, including criteria for action and local contracted social care referral arrangements.
- o. instilling and embedding a culture among all staff, of listening to children and taking account of their wishes and feelings. Instilling and embedding any measures the School or Setting may put in place to protect them.
- p. understanding the lasting impact that adversity and trauma can have on children, (including on their behaviour, mental health and wellbeing), and understanding what is needed in responding to this to promote positive educational outcomes.
- q. understanding the unique risks associated with online safety and ensure all staff are confident that they possess the relevant knowledge and capability to keep children safe.

- r. being alert to the specific needs and threats to those with special educational needs and/or disabilities (SEND), those with relevant health conditions and young carers.
- s. understand the importance of information sharing, with safeguarding partners, other agencies, organisations and practitioners.

All Staff Responsibilities

23. Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who meets them has a role to play in identifying concerns, sharing information and taking prompt action.

1. Qualified teaching staff must work in accordance with Teaching Standards which state that teachers (including Head Teachers) must safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

2. All staff and volunteers must always consider what is in the best interest of the child. All staff will:

- a. complete safeguarding training pertinent to their role and level of responsibility.
- b. have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence, radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.
- c. maintain an appropriate level of confidentiality, involving only those who need to be involved.
- d. be aware of systems within the School or Setting which support safeguarding, explained as part of each staff induction.
- e. see, listen and respect the child, with the expectation that they are competent rather than not.
- f. read and understand this Policy Directive and Part 1 of KCSIE/EYFS Statutory Framework and sign a declaration at the beginning of each academic year.
- g. adhere to the staff Code of Conduct and Civil Service Code.
- h. remain alert to potential indicators of abuse, neglect and exploitation.
- i. attend the appropriate safeguarding and child protection training regularly (including online safety).
- j. record then report any concern for a child's welfare or safety to the DSL as soon as possible.
- k. have log in access to and attend training on the use of My Concern.

- l. provide a safe, child centred environment in which children can learn and thrive.
- m. be prepared to identify children who may benefit from Early Help.
- n. never promise a child that secrets can be kept.
- o. reassure victims that they are being taken seriously and that they will be supported and kept safe.
- p. never give the impression that a child is creating a problem by reporting any form of abuse and/or neglect.
- q. recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
- r. demonstrate professional curiosity and speak to the DSL regarding concerns about a child.
- s. remain aware that technology is a significant component in many safeguarding and wellbeing issues and children are at risk of abuse and other risks online as well as face to face.
- t. maintain an 'it could happen here' attitude where safeguarding is concerned.

School Governance Committee Responsibilities

- 3. DCS School and Setting Governance Committees (SGC)² are expected to provide strategic challenge to senior leadership and assure themselves that the safeguarding policies and procedures in place are effective in the delivery of a robust approach to safeguarding. The SGC will facilitate a whole-school approach to safeguarding, ensuring that the safety and welfare of children underpin the ethos and culture. All members of the SGC will read KCSIE in its entirety and attend safeguarding training and relevant updates to ensure good understanding of safeguarding.
- 4. A member of the SGC must be appointed as the Safeguarding member who is responsible for reporting any ongoing concerns to the Assistant Chief Education Officer (ACEO). The Safeguarding member is responsible for meeting with the DSL in onsite visits to review and discuss safeguarding practices.
- 5. The SGC Chair and Safeguarding member, will work with the DSL and the Head Teacher or Setting Manager to undertake an annual safeguarding self-assessment to ensure that all arrangements and functions within the establishment are carried out in line with Section 175 of the Education Act 2002.
- 6. Where an EYFS setting is linked to the school, the oversight and responsibility of the SGC for safeguarding matters extends to the EYFS setting also.

² QVS Commissioners work in accordance with the HMC Governance Manual but follow the principles and direction set out in this Safeguarding Policy Directive.

7. The SGC are required to follow the DfE Data Protection guidance³ for Schools to understand how to comply with data protection law.

Safeguarding Assurance and MOD Governance

8. It is vital that all DCS Schools and Settings can demonstrate that they are meeting their duty and following the guidance for safeguarding children and young people. Section 175 of the 2002 Education Act requires schools and their governing bodies to provide information about how the duties set out in the guidance have been discharged. As part of a co-ordinated approach, the Safeguarding Team will conduct the Section 175 process on behalf of DCS.

9. Overseas Commands are responsible for establishing a Local Safeguarding Partnership (LSPB) for their Command area. Where practicably possible, DCS Schools and Settings, should comply with local Command level procedures and interagency arrangements regarding child protection and safeguarding within the framework of JSP 834.

10. The LSPB must be informed of all serious incidents relating to children in their location. Incidents that must be reported are:

- a. When a child dies (including cases of suspected suicide), and abuse or neglect is known or suspected or when a child has been seriously harmed and abuse or neglect is known or suspected.

11. The Defence Safeguarding Partnership Board (DSPB) provides the lead strategic Pan-Defence partnership and is responsible for ensuring consistent and rigorous approaches to safeguarding and promoting the welfare of children within Defence.

12. The DSPB is supported by the Safeguarding Practice Review Group (SPRG) and the individual Safeguarding Boards held across the tri-service; Army, Navy and RAF. The SPRG is responsible reviewing all Serious Incidents, Learning Accounts and Near Misses.

Confidentiality and Sharing Information

13. Sharing of information between practitioners and organisations is essential for effective identification, assessment, risk management and service provision to keep children safe.

14. DSLs, the SGC and those with leadership responsibility must ensure that they are aware of what staff and pupil data to retain.

15. The DPA 18 and the UK GDPR places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Neither must prevent, or limit, the sharing of information for the purposes of keeping children safe, in accordance with the Information Commissioner's Office guidance.

³ DfE Data Protection in Schools

Child Protection

16. The Children Act 1989 provides clear legislative framework for child protection in England. DCS, wherever practicably possible, adopt the underlying principle that every decision, intervention and support offered is informed by the best interests of the child.

17. When concerned about the welfare of a child, staff shall act in the best interests of the child at the earliest possible opportunity to prevent escalation to safeguarding or child protection.

18. DCS fulfil their safeguarding duties by working in partnership with other agencies including the contracted social work provider in their location, who have duties under the Armed Forces Act 1991.

Making a Referral

19. All safeguarding enquiries and concerns must be made to the MOD contracted social work provider for the location. Staff must make a referral to the provider and the relevant local police force if they believe a child is suffering, likely to suffer from harm or in immediate danger.

- a. Rest of World Locations: crt.bfsws@coreassets.com
- b. British Forces Cyprus: contactuscypus@forcessocialwork.com

20. All contracted social work providers work with overseas Commands and host nations to deliver guidance and support to personnel and their families. Where there is no coverage in location, personnel should contact DCS for advice by emailing RC-DCS-HQ-WSW@mod.gov.uk

21. DSLs should ensure that the threshold guidance for the relevant contracted social work provider is easily accessible to staff responsible for making referrals. Anyone can make a referral. The DSL must be informed as soon as possible if a direct referral has been made.

22. When making a referral to the contracted social work provider or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary and safe to do so.

23. The DSL should be notified of the action that will be taken within one working day of a referral to the contracted social work provider being made. Where this information is not forthcoming, the DSL will contact the assigned social worker for more information.

Parent/Carer Consultation

24. When sharing information about a child or family, the DSL should be transparent about concerns and seek to work cooperatively with parents or carers. It is best practice to inform parents or carers that a referral is being made.

25. Where a parent or carer has not agreed to a referral; concerns, discussions and decisions must be recorded. The contracted social work provider should be told that the parent has withheld their permission.

26. Where a parent or carer has agreed to a referral; concerns, discussions and decisions must be recorded. If, having taken full account of the parent or carers wishes, it is still considered that there is a need for a referral, the parent or carer should be contacted by the referring professional to inform them that a referral has been made.

27. Referrals can be made without first informing parents or carers where to do so would place a child at risk. In this instance, the DSL should take advice from the contracted social work provider to ensure the child can be kept safe.

Police

28. Where there is risk to life or a crime has been committed, staff are to contact the host nation police/emergency service where this exists. Where there is no Service Police and no suitable host nation police presence, the Service Police Crime Bureau (SPCB) should be contacted via email at OpsDesk@rmp.mod.uk or by telephone on 023 9228 5170/5180.

29. Staff should be aware that in some locations it is not appropriate to contact the host nation police or local authorities, for advice and guidance personnel should contact the SPCB as above.

30. The DSL must ensure that children have an appropriate adult during police investigations to support, advise and assist. The DSL or Head Teacher must inform a more senior officer if they consider that the rights of the child or young person are not respected.

Abuse, Neglect and Exploitation

31. All staff should be aware of indicators of abuse, neglect, and exploitation which can be found at **Annex A** and understand that children can be at risk of harm inside and outside of the School, Setting, home or online.

32. All staff should be aware that abuse, neglect and exploitation are rarely stand alone and cannot be covered by one label or definition alone. In most cases, multiple issues will overlap with one another.

33. All staff should exercise professional curiosity and know what to look for, to identify cases of children who may need help or protection.

34. The DSL should consider whether children are at risk of abuse, neglect 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 or witnessing the ill treatment of others, criminal exploitation, serious youth violence, county lines, and extreme ideologies or radicalisation.

35. 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.

36. In all cases, the DSL or DDSL should be consulted for advice but all staff working with children are expected to maintain an attitude of 'it could happen here'.

If a Child Reveals Abuse, Neglect or Exploitation

37. If a child reveals a safeguarding issue, all staff are expected to:
- a. listen and reassure them, allow them time to talk freely and not ask leading questions.
 - b. stay calm and do not show shock or upset.
 - c. use the words Tell, Explain or Describe (TED) to avoid drifting into an investigative interview.
 - d. note the timing and record accurately on My Concern, using the child's own words.
 - e. explain what will happen next and never promise to keep secrets.
 - f. flag the concern to the DSL as soon as possible who will determine the next course of action.
 - g. staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe.

Early Help

38. Some children are more susceptible to risks than others and may experience poorer outcomes if their needs are not met and therefore, may benefit from Early Help. Early Help is providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.
39. All staff should be particularly alert to the potential need for Early Help for a child who:
- a. is disabled or has certain health conditions and has specific additional needs.
 - b. has special educational needs and/or disabilities (SEND).
 - c. has mental health needs.
 - d. is a young carer.
 - e. are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
 - f. unexplainable and/or persistent absences from education, home or care.
 - g. has experienced multiple suspensions, is at risk of being permanently excluded from school.
 - h. is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
 - i. is at risk of being radicalised, exploited or showing an affiliation with extremist ideologies.

- j. has a parent or carer in custody or is affected by parental offending.
- k. is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- l. is misusing alcohol and other drugs themselves.
- m. is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- n. is or previously has been a privately fostered child.

40. If Early Help is appropriate, the DSL or DDSL should lead on liaising with other agencies and setting up interagency assessment as appropriate. Staff may be required to support other agencies in an Early Help assessment, in some cases acting as the lead practitioner. Information and helpful guides around delivering Early Help can be found on the DCS Schools Early Help web page [Early Help Professionals](#)

41. Any member of school staff leading on the Early Help process (The Lead Professional) must ensure the focus of the Family Action Plan (FAM) remains on achieving positive outcomes for children, all Family Action Plans must be well-defined with clear objectives and SMART Goals that are reviewed regularly, at a minimum of every 6 weeks (term time) and structured in a manner that is meaningful and understood by all attending including parents and children. If school is leading on the Early Help, there will be evidence of the child's voice in all plans and assessments.

42. All Early Help Assessments and Plans must be included on MyConcern including Early Help paperwork initiated by partner agencies.

43. The DSL and/or lead professional shall keep the case under constant review, and the school will request a consultation with the Early Help Coordinator if the Team Around the Family or Family Action Plan is not providing support that enables positive outcomes for children and their family. The Lead Professional will refer to the contracted social care team if risk escalates or additional support at child in need level is required. The Early Help coordinator will be informed of all cases where the case has been stepped up to social care.

44. The Lead Professional is responsible for ensuring Part 4 of the Early Help Toolkit is forwarded to the Early Help Coordinator after every review.

45. Questions or requests for advice relating to Early Help should be directed to the Early Help Coordinator at RC-DCS-HQ-WSW@mod.gov.uk

Children with a Social Worker

46. DCS recognises that a child's experiences of adversity and trauma can leave them susceptible to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

47. Where a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of their safety, welfare and educational outcomes. For example, it will inform decisions about:

- a. Responding to unauthorised absence or missing education where there are known safeguarding risks.
- b. The provision of pastoral and/or academic support.
- c. Looked-after Children (LAC), Previously Looked-After Children (PLAC) or Care Leavers.

48. The most common reason for children becoming looked after is because of abuse and/or neglect. The DSL is responsible for gaining the relevant information about a child's looked after legal status, contact arrangements with birth parents/those with parental responsibility, and care arrangements in addition to details of social workers and other relevant agency contacts.

49. A PLAC may remain vulnerable. The SGC, Head Teachers and Setting Managers should ensure that staff have the skills, knowledge and understanding to keep LACs and PLAC's safe. It is important that all agencies work together, and prompt action is taken when necessary to safeguard these children.

Private Fostering

50. The DSL will notify the relevant contracted social work service if they become aware a child is being privately fostered, in line with JSP 834.

51. A private fostering arrangement is one that is made privately 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. A close relative is defined as a grandparent, brother, sister, uncle or aunt as well as half-siblings and step-parents; but does not include cousins, great-aunts or great-uncles, great-grandparents.

52. Most children in private fostering situations are likely to be safe however, in some private fostering arrangements there are clear safeguarding issues and children, and young people do not have appropriate safety or welfare arrangements or support. Where DSLs have concerns about the private fostering arrangements in place, they must immediately report this to the contracted social work provider.

Child on Child Abuse

53. All staff should be aware that children can abuse other children at any age and that it can happen both inside and outside of school and online. It is important that all staff know how to identify it and respond to reports. Peer-on-peer child abuse is most likely to include, but may not be limited to:

- a. Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- b. Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse').
- c. Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- d. Sexual violence, such as rape, assault by penetration and sexual assault.

- e. Sexual harassment, such as sexual comments, remarks or jokes.
- f. Online abuse, this can take the form of abusive harassing, misogynistic/misandrist messages as well as the non-consensual sharing of indecent images, particularly around chat groups and the sharing of abusive images and pornography to those who do not want to receive such content.

54. All staff will challenge inappropriate behaviours between children, particularly those that are abusive in nature. Downplaying certain behaviours can lead to an unsafe environment for children and a culture that normalises abuse.

Harmful Sexual Behaviour (HSB)

55. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected, to inappropriate, problematic, abusive and violent. HSB covers problematic, abusive, developmentally inappropriate, and violent sexual behaviour and may cause developmental damage.

56. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if there is an imbalance of power.

57. DSLs are expected to take the lead role and use professional judgement, taking support from other agencies, in all cases of HSB. All concerns of this nature must be reported to the DSL to determine further action and recorded on My Concern.

Consent

58. Staff are expected to understand that consent to sexual activity may be given to one sort of sexual activity but not another and consent can be withdrawn at any time during sexual activity and each time activity occurs. In addition:

- a. A child under the age of 13 can never consent to any sexual activity.
- b. The age of consent is 16.
- c. Sexual intercourse without consent is rape.

Sharing of Nudes and Semi-Nudes

59. All incidents involving the consensual or non-consensual sharing of nude or semi-nude images/videos, must be reported to the DSL, and recorded on My Concern. Staff must not possess or share the images.

60. DSLs are advised to be familiar with the detailed guidance created by the United Kingdom Council for Internet Safety.

61. Consensual image sharing, especially between older children of the same age, may require a different response and may not be abusive but children need to know it is illegal, whilst non-consensual is illegal and abusive.

Harassment

62. Sexual harassment is 'unwanted conduct of a sexual nature' that covers a wide spectrum of behaviours and can occur online, offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

63. DSLs are expected to have read Part 5 of KCSIE and understand their role and responsibilities in preventing and responding to child-on-child sexual harassment.

Allegations Made Against Other Children

64. Abuse between children will never be tolerated or passed off as banter or part of growing up, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

65. The DSLs will make an immediate ⁴risk and needs assessment for all reports of sexual violence. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. All records are saved onto My Concern and kept under review. Further directions are contained within Part 5 of KCSIE.

66. The DSL should notify the parents or carers of all the children involved, only if it is safe to do so. Care should be taken when deciding what information is provided about other children, and when. The DSL is expected to lead on any agency involvement such as police or social work to ensure information sharing is consistent.

67. Further information on confidentiality and anonymity can be found in Part 5 of KCSIE.

68. The DSL, along with any relevant agencies should meet with the victim, parents or carers, to discuss what is being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.

69. The DSL should meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them. Clear and documented record keeping is essential.

Children who are Gay, Lesbian, Bisexual or Gender Questioning

70. DCS are awaiting the revised DfE guidance on gender questioning. Once published, we will signpost to this guidance here.

71. A child or young person being lesbian, gay, bisexual or gender questioning is not, in itself, an inherent risk factor, however, all staff should recognise that they can be targeted by other

⁴ Where there has been a report of sexual violence, professional risk assessments by social workers will be required. The above school risk assessment does not replace the detailed assessments of such professionals.

children and risks can be compounded when children lack a trusted adult with who they can be open.

72. DSLs should exercise caution when supporting children who are questioning their gender as there remain many unknowns about the impact⁵ of social transitions and may have wider vulnerabilities.

73. DSLs will work in partnership with parents and other agencies other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child.

Children with Special Educational Needs and/or Disabilities or Health Issues

74. All staff must be aware that children with SEND⁶, certain health conditions or certain medical or physical conditions can face further safeguarding challenges, both on and offline. Children with disabilities are three times as likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group.

75. Any abuse involving children with SEND will require liaison with the DSL/DDSL and the Special Educational Needs Coordinator (SENCo).

76. Certain groups of children are more likely to be identified as requiring extra support to meet their safeguarding needs; these could include:

- a. children with SEND
- b. care experienced children
- c. young carers
- d. children with mental health concerns
- e. children living in households where there are mental health concerns and/or substance misuse.
- f. children with communication barriers and difficulties in managing or reporting these challenges.

77. where children may not understand the difference between fact and fiction in online content and so repeat behaviours in schools.

78. 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). For complex cases which involve children with SEND, advice may be sought from the DCS Education Psychology, Speech and Language Service. RC-DCS-HQ-EPSL@mod.gov.uk

⁵ Cass Review

⁶ SEND Code of Practice

Mental Health

79. Schools and Settings have an important role to play in supporting the mental health and wellbeing of children. Mental health, in some cases, can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

80. The SGC working alongside the Head Teacher or Setting Manager, should ensure that clear processes are in place for identifying possible mental health concerns, including routes to escalate and seek further support. If a School or Setting has a Mental Health Lead, it is expected that they are supported by the senior leadership team and work closely with other pastoral leads, including the SENCo.

81. Further support and information can be gained from the Nurse, Health and Wellbeing Officer at RC-DCS-hq-safe@mod.gov.uk

Children Who are Absent from Education

82. DCS's School or Setting direction and guidance adopt, where reasonably practicable overseas, statutory guidance as outlined within Working Together to Improve School Attendance 2024 (WTTISA).

83. The Head Teacher and Setting Manager must ensure appropriate safeguarding arrangements are in place to respond to children who have unexplained and/or persistent absences. DSLs must consider patterns and trends and consideration given to the child's vulnerability and any compounding familial factors.

84. Schools and Settings are expected to have an attendance policy that is shared with parents or carers which outlines the expectation for reporting absences and the actions that will be taken.

85. All Setting Managers or DSL must follow up absences in a timely manner. If a child is absent for a prolonged period of time, or absent without notification from a parent or carer, attempts to contact the emergency contact must be made.

86. Head Teachers and/or DSLs must work with parents/carers, other agencies and Commands to ensure effective and timely information sharing to promote all children of compulsory school age receive suitable a suitable education whilst on overseas postings.

87. DCS has the responsibility to track and locate all Children who are Missing from Education (CME). The Definition of CME is 'Children of compulsory school age (typically from 5 years old until the last Friday in June of the year they turn 16) who are not attending school and are not being educated at home or in any other provision'. DCS has adopted the UK Statutory Guidance for CME within the DCS Directive Children Missing from Education 3.2.30.

88. All Schools and Settings should notify the Education Welfare Service (EWS) on the EWS Notification form⁷ if they are made aware that a child has gone missing from education. This might include:

- a. A child who was meant to start and hasn't arrived

⁷ [Link](#)

- b. A child has been absent from School or Setting, and the parent/carers are not responding to attempts to contact
- c. A child has left your School or Setting with no forwarding information or knowledge of next school place.
- d. A young person above the age of 16 years has left school and not taken up a place at 6th form or colleague. This child is referred to as NEET.

89. Head Teachers and/or DSLs should refer to the DCS Policy Directive 3.2.6 School Attendance and initiate the staged response to attendance and refer to the EWS for immediate support if a child is:

- a. Struggling with low school attendance (below 90%).
- b. When a pupil misses 10% or more of school sessions, this would be classed as persistent absence. Absent rates may include both authorised and unauthorised absence. Barriers to full attendance are complex and specific to individual pupils and families and these must be considered. However, if support at school level has been provided, and no sustained change is observed, a referral for EWS intervention should be considered as absence at this level does considerable damage to a child's educational prospects.
- c. On part-time timetables.
- d. Missed a significant portion of education at one time.
- e. School refusing.

Domestic Abuse

90. DCS complies with the principles in JSP 913 and aims to ensure that all cases of domestic abuse are notified to the contracted social care provider and/or the police. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. All staff should be aware that domestic abuse can be, but is not limited to, psychological, physical, sexual, financial, emotional and/or coercive and controlling behaviour.

91. Children can witness and be adversely affected by domestic abuse in the context of their home life, including where they see, hear or experience its effects. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

92. DSLs are expected to work in partnership with other agencies to provide emotional and practical help to children. Where appropriate, the DSL should make a referral to the contracted social work provider if they are concerned about a child's welfare.

Female Genital Mutilation (FGM)

93. All staff and the SGC Safeguarding member must undertake the Government training to be alert to the potential indicators that a girl may be at risk of FGM or has already suffered FGM.

94. Teachers must comply with Section 5b of the Female Genital Mutilation Act 2003, which places a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.

95. Teachers must report this personally, but in the case where they have valid, exceptional reason not to, should seek immediate advice from the DSL⁸.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

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

97. CSE and CCE can affect children, both male and female and can include children who have been moved for the purpose of exploitation. DCS staff should be aware that CSE and CCE can and does happen in locations outside of the UK and all staff should refer to DfE KCSIE for further details.

Modern Slavery

98. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, further information on the signs that someone may be a victim of modern slavery, the support for victims is available in the UK guidance⁹.

99. Concerns that a child may be a potential victim of modern slavery or human trafficking should be immediately referred to the police and the contracted Social Work Provider to ensure the child is safe. These agencies will be responsible for making further necessary referrals.

Concerns Relating to Extremist Ideologies and Radicalisation

100. DSLs should be aware that children may be susceptible to radicalisation into terrorism and protecting children from this risk should be a part of the school's approach.

101. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism.

102. All staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

33. Information on when and how to make a report can be found at [mandatory reporting of female genital mutilation: procedural information](#)

⁹ [Victims of Modern-Day Slavery Government Guidance](#)

103. DCS are subject to the duty under section 26 of the Counter-Terrorism and Security Act 2015, to have 'due regard to the need to prevent people from being drawn into terrorism', this duty is known as Prevent. The purpose of Prevent is to safeguard and support people who are vulnerable to radicalisation; a process through which a person comes to support terrorism and ideologies associated with terrorist groups.

104. DCS staff are directed to follow JSP 345: 'Applying Prevent within Defence' in all circumstances where there are concerns that a child is vulnerable to being drawn into terrorism.

105. All staff must undertake Prevent Duty training¹⁰ and understand their role in reporting any concerns relating to radicalisation. The Head Teacher or DSL are responsible for making Prevent referrals.

106. In addition, DSLs must also ensure that they have read and are familiar with the guidance contained within The Prevent Duty: An introduction for Those with Safeguarding Responsibilities¹¹

Online Safety

107. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. An effective approach to online safety empowers a School or Setting to protect and educate children and staff and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

- a. Content (being exposed to illegal, inappropriate, or harmful content, such as: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- b. Contact (being subjected to harmful online interaction with other users)
- c. Conduct (online behaviour that increases the likelihood of, or causes, harm)
- d. Commerce (risks such as online gambling, inappropriate advertising, phishing and or financial scams)

109. SGCs should ensure online safety is a running and interrelated theme whilst devising and implementing their whole school approach to safeguarding and related policies and procedures. Further information is contained within KCSIE.

110. Setting Managers work in accordance with the direction contained within the EYFS Statutory Framework and should consider the DfE guidance¹²

Filtering and Monitoring

¹⁰ Prevent Duty Training

¹¹ [Link](#)

¹² The Prevent duty: an introduction for those with safeguarding responsibilities.

111. DCS Schools and Settings have in place robust filtering and monitoring IT systems and will, as close as is practicable, follow the Government guidance¹⁴ to reasonably limit children's exposure to the risks from IT systems.

112. The SGC and Head Teacher and/or Setting Manager should review the effectiveness of their filtering and monitoring systems at least annually, whilst ensuring that the leadership team and relevant staff have an awareness and understanding of the provisions in place, knowing how to escalate concerns when they are identified.

113. The SGC, Head Teacher and/or Setting Manager should consider the number and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system. They must consider the effectiveness of blocking harmful and inappropriate content without unreasonably impacting teaching and learning.

114. DCS are bound by the MODs direction and restrictions on the full utilisation of artificial intelligence contained within JSP 936. Head Teachers and Setting managers should also ensure they have familiarised themselves with the DfE guidance contained within [Generative AI: Product Safety Expectations](#).

Photography & Images

115. All Head Teachers and Setting Managers must ensure that images are recorded and stored securely, in line with the DCS Social Media Statement. Non-school issued or personal devices must not be used to capture or record images of children, or any School or Setting activity.

116. Informed, written consent from parents/carers must be sought in the admissions process and the names of children whose images are being used in any published material should be removed. On admission, parental or carer consent must be obtained for images and recordings of their children to be used by the School or Setting for legitimate reasons. Where a photograph is used, the children must not be named without direct parental or carer consent.

Personal Devices & Acceptable Use of Technology

117. Many children have unlimited and unrestricted access to the internet via mobile networks and therefore, whilst at a DCS School or Setting, the Head Teacher or Setting Manager is responsible for ensuring that the School or Setting has a clear policy on the use of mobile and smart technology. All staff are expected to reinforce the importance of online safety when communicating with parents or carers.

118. Head Teachers and DSLs, in accordance with the DfE's guidance¹⁵ have the power to search children's mobiles if they have cause for concern. DSLs, Head Teachers and Setting Managers should familiarise themselves with the additional guidance and conditions on the powers contained within KCSIE.

119. All staff must be made aware of the restrictions placed on them with regard to the use of private mobiles and cameras and sign to comply with the acceptable use of the internet in the School or Setting, use of the school's ICT systems and use of their mobile phone and smart

¹⁴ Filtering and monitoring standards for schools and colleges

¹⁵ DfE's guidance on searching, screening and confiscation

technology. All staff are to adhere to JSP 740: MoD 'Acceptable User Policy' which makes clear that online conduct is covered by the expectations of the Civil Service Code of Conduct.

Recording

120. Concerns about a child's welfare and the actions that are taken should always be recorded in writing. Records should include clear and explicit written agreement about who will take what action, or that no further action will be taken explaining why. Records should be managed in accordance with JSP 441: Information, Knowledge, Digital and Data in Defence.

121. Head Teachers and Setting Managers are responsible for ensuring that all staff recognise that clear, appropriate recording is essential in terms of accountability and allows for the greater protection of both children and staff, from Early Help to child protection. Lack of information about circumstances can impact a child's safety, welfare and educational outcomes.

122. All DCS staff are expected to comply with the direction outlined in KCSIE and ensure all safeguarding records include:

- a. a clear and comprehensive summary of the concern
- b. all discussions and decisions made, and the reasons for those decisions. Information should be kept confidential and stored securely.
- c. the DSL must ensure that the file is kept confidential, stored securely and only accessed by those who need to see it.
- d. if in doubt about recording requirements, staff should discuss this with the DSL or contact RC-DCS-HQ-SAFE@mod.gov.uk for further support.

123. Head Teachers and Setting Managers must adhere to the duties outlined within DPA 18 and the UK GDPR and follow the DfE advice on information sharing¹⁶. DPA 18 and the UK GDPR are not a barrier to sharing concerns about a child's welfare or safety.

My Concern

124. Records must demonstrate a clear and comprehensive summary of the concern, details of who is responsible for follow up actions and timescales for reviews. The DSL is responsible for ensuring all staff are up to date with the My Concern training and have access to their own account. Paper based recording is not used except in extreme circumstances.

125. For transparency, parents/carers are to be informed (via the website or induction materials that My Concern is used) by the School or Setting to securely record and monitor all welfare, child protection and safeguarding concerns.

126. A body map should be completed as part of the My Concern record if injuries have been observed.

Transfer of Records

¹⁶ [Advice for practitioners providing safeguarding services to children, young people, parents and carers 2015.](#)

127. The DSL is responsible for ensuring all safeguarding records are transferred in accordance with data protection legislation to the child's subsequent school as soon as possible.

128. The DSL is responsible for ensuring all transferred in safeguarding records are considered and included on My Concern. The DSL is responsible for confirming the information is received, has been read and that key staff are made aware of relevant information as required.

129. If a child for whom the School or Setting has, or had, safeguarding concerns, moves to another School or Setting, the DSL will ensure that their file is forwarded as soon as possible, securely, and separately from the main pupil file.

130. To allow the new School or Setting to have support in place when the child arrives, this should be within five days for an in-year transfer, or within the first five days of the start of a new term. A confirmation of receipt should always be obtained. It is the responsibility of the DSL to ensure the following information will be recorded on the admissions register by the School Business Manager:

131. The name of the new School or Setting

132. The date on which the pupil first attended, or is due to attend, that School or Setting

133. For a child where there are previous or ongoing safeguarding concerns the DSL will follow up with the receiving School or Setting via email to ensure the child has arrived.

134. In addition, if the concerns are significant or complex, the DSL is responsible for speaking to the receiving DSL and provide information to enable them to make any necessary preparations to ensure the safety of the child and ensure they have support in place for when they arrive.

135. The DSL is expected to work closely with parents and carers to ensure that the child understands the arrangements in place, are effectively supported, and informed of where additional support can be accessed.

136. Receiving Schools or Settings should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named persons with oversight for special educational needs and disabilities (SEND) School or Setting, are aware as required.

Safeguarding and Supportability

137. Where a child is moving to a DCS School or Setting, the DSL will be responsible for sourcing information and ascertaining the child's support needs, supported by the SAFE and/or WSW team, if there is an indication of Local Authority Children Services involvement.

138. If DCS need to contact a local authority to fully understand and assess a child's needs, and a parent or carer does not consent to the sharing of information, the assessment of support needs cannot be completed. The parent or carer will be advised of the possible impact this will have on their proposed accompanied posting overseas.

139. Schools and Settings should gain further guidance from the DCS Directive 3.2.6 Assessment of Support Needs for Accompanied Postings Overseas.¹⁷

Allegations Against Staff

140. DCS on behalf of the Defence Safeguarding Partnership Board (DSPB) is responsible for ensuring records are kept of all allegations made against MOD personnel (including volunteers) who have direct supervisory contact with those who are under 18 years of age.

141. If staff have concerns or allegations about someone in a position of trust (including a supply teacher, volunteer or contractor), posing a risk of harm to children, the Head Teacher or Setting Manager are to be notified as soon as possible.

142. Where a conflict of interest occurs in reporting a concern or allegation or if the concerns relate to the Head Teacher or Setting Manager, the Assistant Chief Education Officer (ACEO) should be notified. The ACEO will then follow the procedures set out JSP 834 and contact the Defence Allegation Designated Officer (DADO) Service RC-DCS-HQ-DADO@mod.gov.uk.

143. The Head Teacher or Setting Manager must be informed if anyone working or volunteering in the School/Setting has:

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

144. Head Teachers and Setting Managers must inform the DADO of any allegations of harm or abuse by anyone living, working or looking after children, whether the allegation is alleged to have been committed away from the setting, in the home or elsewhere. The DADO will advise on next steps regarding referrals to the appropriate regulatory body.

145. The Head Teacher or Setting Manager is responsible for ensuring all staff involved are aware of their duty to maintain strict confidentiality throughout the allegation management process. Notification forms can be obtained by contacting RC-DCS-HQ-DADO@mod.gov.uk

146. If there is an immediate threat to the safety of children, young people or staff, the local police force must be contacted immediately.

Low-Level Concerns

147. The SGC and Head Teacher or Setting Manager should ensure the staff code of conduct, behaviour policies and safeguarding procedures are implemented effectively and ensure that appropriate action is taken in a timely manner to facilitate a whole organisation approach to dealing with low level concerns.

¹⁷ [Link](#)

148. It is the responsibility of the Head Teacher or Setting Manager to ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing the expected, appropriate behaviours from inappropriate, problematic or concerning behaviour, in themselves and others.

149. All low-level concerns, relating to DCS staff, volunteers or contracted staff, should be shared with the Head Teacher or Setting Manager in the first instance. Staff should be empowered to share any low-level safeguarding concerns, including self-referral, where, for example, staff have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

150. Low-level concerns which are shared about supply staff and contractors should be notified to their employers and the relevant contact within Command so that any potential patterns of inappropriate behaviour can be identified. This information should also be shared with the DADO Service.

151. If there is uncertainty as to whether the information which has been shared about a member of staff as a low-level concern meets the harm test threshold, the DADO Service should be consulted.

152. Records should be reviewed so that potential patterns of inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the School or Setting should decide on a course of action, either through its Civil Service Misconduct procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the DADO Service.

153. It is at the discretion of the Head Teacher or Setting Manager where low-level concern records are held, but they must be kept confidential, securely and comply with the DPA and UK GDPR. It is for the Head Teacher or Setting Manager to decide how long information is retained, but it is recommended that it is at least until the individual leaves DCS employment. Further advice on how records containing sensitive, personal information are to be held, should be sought from RC-DCS-HQ-IHUB@mod.gov.uk.

Abuse of Position of Trust

154. Under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship or engage in sexual acts with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity in the real or digital worlds between a member of the DCS staff and a child under 18 may be a criminal offence, even if the pupil is over the age of consent. Any such concerns are reported to the DSL immediately who must inform the DADO service.

Whistle-blowing

155. Whistleblowing is the mechanism by which staff can voice their concerns made in good faith, without fear of repercussion. Staff may raise a concern in accordance with JSP 492 Defence Ethics, Propriety and Standards and contact the Confidential Hotline on 0800 161 3665 (UK), / +44 1480 44 6380 or e-mail Confidential-hotline@mod.gov.uk.

156. Personal grievances (for example bullying and harassment) are not covered by whistleblowing law.

Safeguarding Training

157. The Head Teacher or Setting Manager is responsible for ensuring all staff access the required training as laid out in the Safeguarding Training Matrix in Volume 1 of JSP 834 and in KCSIE.

158. All staff, volunteers and SGC members will undertake safeguarding training at induction, including whistle-blowing procedures, My Concern and online safety to ensure they understand the safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. All staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

159. All staff will undergo Prevent training on the government's anti-radicalisation strategy, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

160. All staff are required to complete induction training, delivered by the DSL within two weeks of commencing employment.

161. All staff and SGC members are to attend further Safeguarding training within twelve weeks of commencing their role, in addition to undertaking the online FGM and Prevent training.

162. DSLs and Senior Leadership staff are required to undertake advanced training prior to commencing the role. This training must be updated every two years to extend knowledge. In addition, knowledge and skills are built upon at regular intervals and at least annually (for example, through webinars, bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

Safer Recruitment

163. The SGC, Head Teacher, or Setting Manager must ensure that all individuals involved in the recruitment and employment of staff have completed safer recruitment training. Furthermore, every interview panel must include at least one member who is trained in safer recruitment.

164. Head Teachers and Setting Managers are responsible for ensuring that recruitment practices for all staff and volunteers are conducted in accordance with JSP 893 and KCSIE and/or the EYFS framework, as far as is practicable.

165. In addition, Schools and Settings must carry out any additional checks they deem appropriate to ensure that any relevant events occurring outside the UK are taken into account.

Single Central Record (SCR) and Record Keeping

166. All DCS Schools and EYFS settings are required to hold and maintain a Single Central Record (SCR) to demonstrate that all mandatory pre-onboarding and safer recruitment checks

have been completed for all staff, volunteers, frequent visitors, and members of the School Governance Committee (SGC).

167. All DCS SCRs must contain:

- a. Identity checks/Right to Work in the UK
- b. Prohibition checks
- c. Vetting processes
- d. Reference details
- e. Criminal records checks (DBS) including Overseas checks (if applicable) numbers, dates and who obtained them
- f. Staff Qualifications
- g. Section 128 checks
- f. Safeguarding Training completion dates

168. Both DCS Schools and Settings are required to follow the safer recruitment guidance set out in KCSIE with settings also adhering to the key changes introduced in the EYFS 2025 framework.

169. The Chair of the School Governance Committee (SGC) must ensure that regular checks and monitoring of the Single Central Record (SCR) are carried out by the senior leadership team.

170. The Safeguarding Team within DCS HQ is responsible for conducting Single Central Record (SCR) audits across all DCS Schools and Settings.

Checking the Identity and Suitability of Visitors

171. Visitors must verify their identity to the satisfaction of the School or Setting and are expected to read the safeguarding information prior to signing in. All visitors must wear a visitor badge or lanyard at all times and must refrain from using personal electronic devices while on the premises.

172. The Head Teacher or Setting Manager is responsible for ensuring that all appropriate checks are completed prior to a visitor's entry. All other visitors, including guest speakers, must be accompanied by a member of staff at all times.

173. Head Teachers and Setting Managers must not invite into the School or Setting any speaker known to disseminate extremist views. They are responsible for carrying out appropriate checks to ensure that any individual or organisation using the facilities is not seeking to promote extremist views or radicalise pupils or staff.

Use of School or Setting Premises

174. Section 11 of the Children Act 2004 places a duty on a range of organisations, including schools and educational settings, to ensure that their functions, and any services they contract, are carried out with due regard to the need to safeguard and promote the welfare of children.

175. Where services or activities are provided independently by another organisation using the school or setting premises, the Head Teacher or Setting Manager must seek written assurance that the organisation has appropriate safeguarding procedures in place, and that all relevant checks have been completed for staff and volunteers.

176. The Head Teacher or Setting Manager reserves the right to cancel or postpone use of the premises if the individual or organisation fails to provide original evidence of appropriate safeguarding checks to the satisfaction of the School or Setting.

Disclosure and Barring

177. Head Teachers and Setting Managers are responsible for ensuring that the necessary Disclosure and Barring Service (DBS) checks are undertaken in compliance with MOD requirements under JSP 893. DBS checks must be renewed every three years. From October 2024, all individuals undergoing DBS renewal or onboarding are mandated under JSP 893 to register with the DBS Update Service. DCS does not recruit 'at risk'.

178. Head Teachers and Setting Managers are responsible for conducting annual routine checks for individuals registered with the DBS Update Service. In accordance with legal requirements, consent must be obtained from each individual prior to carrying out a check. Individuals must be informed of the check and provide explicit consent before it is undertaken. Evidence of completed checks, including confirmation of consent, must be recorded on the Single Central Record (SCR).

179. Head Teachers and Setting Managers are responsible for ensuring that references and police checks are obtained for any individual who has lived or worked outside the UK for a cumulative period of three months or more within the last five years, prior to onboarding.

178. These overseas checks must include, where available:

- a. a police clearance certificate from the relevant country, and
- b. references from any overseas employers.

179. Where such documentation cannot be obtained, the Head Teacher or Setting Manager must assess the risk and consider alternative forms of assurance.

180. If a disclosure reveals that an applicant is prohibited from seeking or engaging in work with children, it is a criminal offence for that individual to apply for or accept any role involving Regulated Activity. In such cases, the police must be informed without delay.

181. It is a criminal offence for DCS to knowingly offer a position involving Regulated Activity to an individual who is disqualified from working with children, or to fail to remove such an individual from that role. DCS fully complies with its duties as an employing authority under relevant legislation.

182. All Head Teachers and Setting Managers are expected to have read and understood the criteria and procedure for making a barring referral.¹⁸ Further support can be sought via the Defence Allegation Designated Officer (DADO) Service. RC-DCS-HQ-DADO@mod.gov.uk.

Serious Incidents

183. In the event of a serious incident, as defined in JSP 834, Volume 1 and JSP 375 Management of Health and Safety in Defence, The Head Teacher or Setting Manager must complete the DCS Serious Incident Notification Form at **Annex B** and send to the Welfare and Social Work Team inbox: RC-DCS-HQ-WSW@mod.gov.uk within 24 hours of the incident. The WSW team will liaise with schools/settings, local command and partner agencies to ascertain whether a referral to the Defence Safeguarding Partnership Board (DSPB) via the AFFS Safeguarding Policy Team is required, as well as provide any advice, guidance or actions for next steps.

¹⁸ <https://www.gov.uk/guidance/barring-referrals> or <http://www.disclosurescotland.co.uk/protectionservices/referralprocess.htm>

Definitions and Signs of Abuse	
Child abuse happens when someone harms a child. It can be physical, sexual or emotional or involve neglect. Children who experience abuse may struggle to talk about it and ask for help, so it is vital anyone working with children or young people can recognise the indicators.	
Abuse	Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. Children can be at risk of harm inside and outside of the School or Setting, inside and outside of home, and online. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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.
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	Persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person.

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	It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. Emotional abuse may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse occurs in all types of maltreatment of a child, though it may occur alone.
Sexual Abuse	Involves forcing or enticing a child or young person 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, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may 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, 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.
Domestic Abuse	Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Children in this situation can suffer emotional and psychological maltreatment, including where they see, hear, or experience its effects. Detailed direction and guidance on Domestic Abuse is laid out in JSP 913: Whole Force Policy on Domestic Abuse.

Neglect	The persistent failure to meet a child's basic physical and/or psychological needs which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child., likely to result in the serious impairment of the child's health or development. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing, and shelter (including exclusion from home or abandonment). b. protect a child from physical and emotional harm or danger. c. ensure adequate supervision (including the use of inadequate caregivers). d. ensure access to appropriate medical care or treatment Neglect may also involve a parent or carer, fabricating the symptoms of, or deliberately inducing illness in a child.
Child on Child Abuse	Children can abuse other children, and it can happen both inside and outside school or setting as well as online. All staff should be clear as to the policy and procedures with regard to child-on-child abuse and the important role they have to play in both preventing and responding to it where they believe a child may be at risk.
Child Sexual Exploitation¹⁹	This is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity: a. in exchange for something the victim needs or wants, and/or

¹⁹ DfE non-statutory guidance for Child Sexual Exploitation (2017)

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	b. for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
Child Criminal Exploitation (CCE)	Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual 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. 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.
Female Genital Mutilation	Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. 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 report this to the police.
Mental Health	Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external providers.

DCS Serious Incident Notification Form

OFFICIAL-SENSITIVE-PERSONAL (when completed)

Reporting Details						
Date of Report						
Name of Notifier						
Title						
School/Setting						
Address						
Tel No						
Email						
Subject(s) of Report						
First name	Surname	Any known aliases	DOB	Address	Gender	Rank/Service Number/Unit
Family Composition/Significant Others						
Name	Relationship to Subject of Report	DOB	Address	Rank/Service Number/Unit	Commanding Officer/Line Manager	
Agencies known to be involved with the case						
Name	Agency	Address, Tel No./Email			Nature of involvement	

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Reason for report (please put a X in the boxes that apply)			
A child has died (including cases of suspected suicide), and abuse or neglect is known or suspected.			
A child has been seriously harmed and abuse or neglect is known or suspected.			
A child has been seriously harmed whilst on school property, either by another individual or due to an incident or injury on school site.			
There was clear evidence of a risk of significant harm to a child that: Was not recognised by organisations or individuals in contact with the child or perpetrator; or Was not shared with others, or Was not acted on appropriately.			
The death of a person aged 16 or over has, or appears to have, resulted from violence, abuse, or neglect by a person to whom they were related or with whom s/he was or has been in an intimate personal relationship, or a member of the same household as him/herself, held with a view to identifying the lessons to be learnt from the death.			
The case highlights or could highlight improvements needed to safeguard and promote the welfare of children. For example, injury in a MOD community setting.			
The case highlights or could highlight recurrent themes in the safeguarding and promotion of the welfare of children, e.g., the failure to share information which led to a child being at increased risk.			
The case raises or may raise issues relating to the safeguarding and promotion of the welfare of children in institutional settings, e.g., failure to respond appropriately to safeguarding issues in school establishments or external clubs etc.			
The case highlights or could highlight concerns regarding two or more agencies working together effectively to safeguard and promote the welfare of children.			
One or more agency or professional considers that its concerns were not taken sufficiently seriously, or acted on appropriately, by another.			
The child concerned was the subject of a child protection plan or had previously been the subject of a plan.			
There are indications that the case may attract media interest.			
Summary of Events			
Location of incident:			
Events and circumstances			

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Witnesses to the event	
Steps you have taken so far	

Outcome	
Desired Outcome of submitting this report	

This reporting form is now complete.

Please return to: **RC-DCS-HQ-WSW@mod.gov.uk**

FOR DCS Welfare and Social Work Team

On Receipt			
Date Received to the mailbox			
Date Responded to the referrer			
WSW Team Member Name			
WSW Team Member Role			
Actions/Recommendations made back to the referrer			
Does this trigger a Rapid Review?		Date completed	
Is an Annex A (JSP 834 Pt 1) required?		Date completed	

DADO Allegations Management Notification Form

OFFICIAL-SENSITIVE – PERSONAL (When completed)

Please complete in order to make a referral to DADO or request a consultation with DADO.

Please complete this form in full and to the best of your ability when there is an allegation that somebody who works with children has:

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

If the allegation is against more than one person, then a separate form should be completed for each person.

Any concern(s) about a professional should be referred to the DADO within **24 hours** of the incident. **(If there is an immediate risk of harm to a child, please make a referral to Children & Families and / or Police)**

Section 1: Details of adult against whom the allegation has been made

Name	
Rank	
Company	
Role at training establishment	
Date of Birth	
Ethnicity	
Sex assigned at birth (Male, Female)	
Home Address	
Home Regiment	

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Name of their Commanding Officer?			
Contact details for the Commanding Officer	Tel:		
	Email:		
Is the Commanding Officer aware of this allegation?			
Have any allegations or concerns been made against this person previously. If so, please provide details including where and what sanctions were there (if any)			
Does the person have any other contact (through other work and /or volunteering) with vulnerable individuals (children or adults)	☐ Yes	☐ No	☐ Unknown
	If yes, please complete information below:		
Name of organisation and address			
Does the person have children of their own and / or care for children in a personal capacity, either full time or occasionally at home or at another address?	☐ Yes	☐ No	☐ Unknown
	If yes, please complete information below:		
Name(s) and DOB/age: Please add all children separately, their address and with whom they reside			
Relationship(s)			

Section 2: Details of person making the notification

Name (Forename(s) and Surname)	
Rank	
Current role	
Contact number(s)	
Email address	

Section 3: Details of person managing the case

If the responsible individual managing the case is different from person making the notification

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Name	
Rank	
Regiment	
Role	
Contact Number(s)	
Email Address	

Section 4: Details of child(ren) involved in allegation

If the incident concerns more than one child, each child must be named on the same form, please duplicate this section

Name(s)			
Date(s) of Birth			
Ethnicity			
Sex assigned at birth (Male, Female)			
Home address(s)			
Do they have a disability	☐ Yes	☐ No	☐ Unknown
Are they a looked after child?	☐ Yes	☐ No	☐ Unknown
Responsible Local Authority			
Is there a Child Protection Plan in place?	☐ Yes	☐ No	☐ Unknown
Name of parent/carers			
Has the parent / carer been informed?	☐ Yes	☐ No	☐ Unknown
If yes, have they provided their view?	☐ Yes	☐ No	☐ Unknown

If yes, please complete information below:			
Do they have a social worker?	If yes, please complete information below:		
Contact details (name, number(s) and email address) of social worker			
Have they been informed?	☐ Yes	☐ No	☐ Unknown
Have they provided a view?			

Section 5: Details of the allegation or concern

Date and time of incident	
Location of incident	
Have you discussed this allegation with a DADO or DADO support? If yes – please state who you have spoken to and when:	
Please indicate the category of abuse and threshold you think is met: (Tick ☒ all you believe apply)	☐ Physical ☐ Sexual ☐ Emotional ☐ Neglect ☐ Other ☐ Harm Threshold: Behaved in a way that has harmed, or may have harmed, a child; and/or ☐ Criminal Threshold: Possibly committed a criminal offence against, or related to a child; and/or ☐ Risk Threshold: Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or ☐ Suitability Threshold: Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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Description of allegation or concern: Please provide as much information as possible including details of any injuries/harm and any witnesses to the incident and any action(s) taken.

Please submit any written incident reports / body maps, if available, with the Allegations Management Notification Form.

What action(s) has been taken regarding the allegation so far?

Has any immediate safeguarding action been taken?

Have referrals to the Police and Children's Social Care been made (if appropriate)?

Are the Royal Military Police involved?

☐ Yes

☐ No

☐ Unknown

If yes, please provide a name, telephone number and email address.

Are the Army Welfare Service involved?

☐ Yes

☐ No

☐ Unknown

If yes, please provide a name, telephone number and email address.

Do you believe the individual poses a risk of harm to children and young people in the organisation?

Please give details:

Please complete this form electronically and return it to: RC-DCS-HQ-DADO@mod.gov.uk.