ST PETER'S

PREPARATORY SCHOOL

Child Protection and Safeguarding Policy

Updated September 2026
by Mrs Amy Hughes
(DSL, Deputy Head, Pastoral)

Approved by Head: Charlotte P Johnston.

Date: 10 September 2026

Safeguarding Statement

St Peter's Preparatory School recognises our moral and statutory responsibility to safeguard and promote the welfare of all pupils, and expects all staff and volunteers to share this commitment. Our children have the right to protection, equal opportunities and a right to be safe in our school. We endeavour to provide a safe and welcoming environment, where children are respected and valued.

We are alert to the signs of abuse,neglect and Exploitation and follow our procedures to ensure that children receive effective support, protection and justice. We listen to our pupils and take seriously what they tell us; children are aware of the adults they can talk to, if they have a concern. The Child Protection and Safeguarding policy underpins and guides St Peter's Preparatory School's procedures and protocols to ensure its pupils and staff are safe.

KEY EXTERNAL CONTACT DETAILS

Local Authority Designated Officer (LADO)	Karen Thompson Devon County Council Telephone number: 01392 384964 Email: childsc.localauthoritydesignatedofficersecuremailbox@devon.gov.uk
Devon County Council children's social care department	Telephone number: 0345 1551071 Email: mashsecure@devon.org.uk Enquiry Form: https://www.devonscp.org.uk/make-a-request-for-support/professionals-practitioners/ Out of hours emergency: 0345 6000 388 Duty team telephone number: 01392 383 000
Devon Safeguarding Children Partnership	https://www.devonscp.org.uk/
FGM reporting - non-emergency police contact number	101
Prevent partner and advice about extremism	Counter Terrorism Policing Team 01392 225130

	prevent@devonandandcornwall.pnn.police.uk. Non-emergency DfE advice 020 7340 7264 counter-extremism@education.gsi.gov.uk
UK Safer Internet Centre	0344 381 4772 helpline@saferinternet.org.uk
NSPCC helpline	Weston House 42 Curtain Road London EC2A 3NH Telephone: 0808 800 5000 Email: help@nspcc.org.uk https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/nspcc-helpline/
Reporting serious wrongdoing to the Charity Commission	For further guidance see: https://rsi.charitycommission.gov.uk/web/register/reporting-or-updating-a-serious-incident whistleblowing@charitycommission.gsi.gov.uk
Report Abuse in Education helpline	A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for nonrecent abuse. 0800 136 663 or email help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbs.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road

	Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000 100 EMAIL: concerns@isi.net

KEY SCHOOL CONTACT DETAILS

Board of Reference	**Proprietor and Nominated Safeguarding Board of Reference** ● Jon Middleton TEL: 01395 272148 EMAIL:Jon.middleton@splfinance.co.uk
Designated Safeguarding Lead ("DSL") and Deputy Designated Safeguarding Lead ("DDSL")	**Main DSL for the School** ● Amy Hughes TEL: ● 01395 272148 EX 376 EMAIL: ● amy.hughes@stpetersprepschool.co.uk **DDSLs:** **Rachel Jupp, Lizzy Glanvill, Charlotte Johnston, Virginie Evans, Katie Gray** Rachel Jupp: 01395 280335 EMAIL: rachel.jupp@stpetersprepschool.co.uk Lizzy Glanvill : 01395 272148 Email: Lizzy.glanvill@stpetersprepschool.co.uk (Designated Safeguarding officer for Pre Prep and Early Years) Charlotte Johnston: 01395 272148 Email: Head@stpetersprepschool.co.uk Katie Gray: 01395 272148 Email: Katie.gray@stpetersprepschool.co.uk

	Virginie Evans : 01395 272148 Email: virginie.evans@stpetersprepschool.co.uk
Designated Teacher for Looked After Children	● Amy Hughes TEL: 01395 272148 or 07809411193 EMAIL: amy.hughes@stpetersprepschool.co.uk
Head	●Charlotte Johnston TEL: 01395272148 EMAIL: head@stpetersprepschool.co.uk

POLICY STATEMENT

This policy applies to ST PETER'S PREPARATORY SCHOOL ("the School") which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) and is available on the School website or on request from the school office.

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2026) ("*KCSIE*")
    - *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)*
    - *KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children* (December 2023) ("*WT*")
    - *WT* refers to the non-statutory advice: *Information sharing* (December 2023)
- *Prevent Duty Guidance: for England and Wales* (December 2023) ("*Prevent*"). *Prevent* is supplemented by non-statutory advice and a briefing note:
    - *The Prevent duty: Departmental advice for schools and childminders* (June 2015)
    - *The use of social media for on-line radicalisation* (July 2015)
- *Relationships education, relationships, and sex education (RSE) and health education* (September 2021).
- *Behaviour in schools (September 2022)*
- *Working together to improve school attendance (February 2024)*
- *Keeping children safe in out of school settings (April 2022)*
- *Digital and technology standards in schools and colleges (March 2023)*

- Relationships Education, Relationships and Sex Education (RSE) and Health Education (July 2025).
- Behaviour in schools (February 2024).
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026).
- Children Missing Education (September 2025).
- Digital and technology standards in schools and colleges (June 2026).
- Mobile phones in schools (June 2026).
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026).
- Section 3 of the Early Years Foundation Stage Statutory Framework for group and school-based providers (July 2026) ("EYFS Framework").

This policy also takes into account the procedures and practice of Devon County Council, as part of the multi-agency safeguarding arrangements set up by the Devon families and partnership trust.

The School understands and recognises their obligations under the Equality Act: the School must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

The School recognises that effective safeguarding is anti-discriminatory and anti-racist and understands that factors including economic and social circumstances, ethnicity and disability can affect children and families' lives. Staff are alert to the risk of adultification bias, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed. The School will make appropriate provision to support dialogue with children who have communication difficulties, who do not speak English, or for whom English is not their first language.

CONCERNS ABOUT A CHILD

The School has a duty to consider, at all times, the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the School, and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. The school encourages a culture of listening to the children's views. The school has two independent listeners. There are signs up displaying the independent listeners details. In addition to the independent listeners, the children are able to talk to a variety of staff and peers should they have concerns. The children have a tutor, there are worry boxes and a feelingsafe@stpetersprepschool.co.uk email address to help children tell us anything they wish when talking to us by speaking is too difficult.

Definitions of safeguarding and types and signs of abuse,neglect and Exploitation

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of the children as soon problems emerge,protecting children from maltreatment; preventing 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.

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

physical abuse;
emotional abuse;
sexual abuse; and/or
neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. [The governing body or The proprietor] recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under data protection laws - the Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 - must not be allowed to stand in the way of safeguarding and promoting the welfare of children. Data protection law does not prevent the sharing of information for the purposes of keeping children safe. When deciding what information to share, staff should consider its relevance to the current safeguarding risk, what it is necessary for the receiving setting to know, and whether the information is clearly presented and appropriately contextualised. Professional judgement should be used so that information shared is focused and proportionate. If in doubt, staff should speak to the Designated Safeguarding Lead ("DSL").
The proprietor will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

All staff should:

- listen carefully, using TED (tell me, explain, describe) strategies
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their

experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication}

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled. The record 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, the decision reached and the outcome. The school uses CPOMS to report safeguarding concerns. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the pupil/s at their heart.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early Help and Family Help

Early help means the support available to all children and families through universal and community-based services, including schools, health services and other local provision. Its purpose is to improve resilience and outcomes and reduce the chance of problems getting worse. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

• is disabled or has certain health conditions and has specific additional needs;
• has special educational needs, whether or not they have an Education, Health and Care Plan;
• has a mental health need;
• is a young carer;
• is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, organised crime groups or county lines;
• is frequently missing from education, home or care;
• has experienced multiple suspensions, is at risk of permanent exclusion, has been permanently excluded, or is in Alternative Provision or a Pupil Referral Unit;
• is misusing drugs or alcohol;
• is at risk of modern slavery, trafficking and/or sexual or criminal exploitation;
• is in family circumstances presenting challenges, such as substance misuse, adult mental health problems or domestic abuse;
• is at risk of being radicalised or exploited;
• has a parent or carer in custody, or is affected by parental offending;
• has been repeatedly removed from the classroom;
• is on a part-time timetable;
• is a privately fostered child; or
• is at risk of honour- or faith-based abuse, including Female Genital Mutilation or Forced Marriage.

Where a child's needs go beyond what universal early help services can address - for example where they have multiple and/or complex needs or their circumstances make them more vulnerable - the child may require targeted support through Family Help.

The School has effective measures in place to identify emerging problems and unmet needs. In the first instance, staff who identify a pupil who may benefit from early help or Family Help should discuss this with the School's DSL. The DSL will consider the appropriate action in accordance with Devon's Level of Needs threshold tool and local referral arrangements. Where needs can be met through universal early help, the DSL will coordinate the School's response and liaise with relevant services. Where needs are more complex and may require a multi-disciplinary Family Help assessment, the DSL will make or support a referral in accordance with local authority procedures.

If early help or Family Help is provided, the matter will be kept under review and consideration given to a referral to children's social care for a child protection assessment if the pupil's situation does not improve or if concerns escalate.

What staff should do if they have concerns about a child

If staff (including board of reference members, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a child is in danger or at risk of harm

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately or as soon as possible of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Executive is Devon County council and Devon safeguarding children partnership A full copy of their local procedures can be found Click here for link to Devon county council- safeguarding .

What staff should do if a child is seen as at risk of radicalisation

The School has an important role to play in both educating children and young people about extremism and recognising when pupils start to become radicalised. Staff should follow the School's normal referral processes when there are concerns about children who may be susceptible to extremist ideology and radicalisation. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care and discussion with the DSL.

The School, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments[32] (following

consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL {and DDSLs and board of reference responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

What staff should do if they discover an act of Female Genital Mutilation ("FGM")

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

How should staff respond to an incident of nudes and semi-nudes being shared by pupils

The School is alert to the safeguarding risks arising from the creation and sharing of self-generated intimate images and/or videos. This includes intimate images, videos or live streams created by a child themselves, as well as content created, altered or wholly generated by another person using artificial intelligence, including deepfakes and so-called "deep nudes". Incidents involving AI-generated intimate imagery will be treated with the same seriousness as incidents involving real images and referred to the DSL immediately.

The School recognises that images of pupils published on the School website, social media channels or in marketing materials may be vulnerable to misuse or AI manipulation. Any concerns about misuse or manipulation of published pupil images must be reported to the DSL immediately.

All members of staff have a duty to recognise and refer incidents involving self-generated intimate images and/or videos and will receive appropriate safeguarding training and

support. Any direct disclosure by a child will be taken seriously. Staff will only ask appropriate and sensitive questions and will seek to minimise further distress or trauma.

For the purposes of this policy, "self-generated intimate images and/or videos" includes self-generated intimate images, videos or live streams involving a person under 18, whether created by the child, another person, digitally manipulated, or generated using AI. The content may be shared publicly, in one-to-one messages, group chats, closed social media accounts, gaming platforms, chat apps, forums, AirDrop or similar services. Alternative terms sometimes used include youth-produced sexual imagery, indecent imagery, image-based sexual abuse and sexting. The exact title of the national guidance referred to below continues to use the phrase "Sharing self-generated intimate images and/or videos".

If staff are notified of or become aware of an incident involving self-generated intimate images and/or videos being created or shared by a pupil, or involving a pupil, they must refer the incident to the DSL as soon as possible. Every such incident will receive a safeguarding response, whether the creation or sharing appears consensual or non-consensual. The School will take a proportionate approach that considers the age, development and circumstances of the children involved and any elements of coercion, exploitation or vulnerability.

The DSL will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024). This will include:

• holding an initial review meeting with appropriate staff;
• speaking with the children involved where appropriate;
• informing parents and carers at an early stage and keeping them involved, unless there is good reason to believe that doing so would put a child at risk of harm; and
• carrying out a risk assessment to determine whether a child has been harmed or is at immediate risk of harm.

An immediate referral to the police and/or children's social care through the MASH or equivalent will be made where any of the following applies:

• the incident involves an adult, including an adult posing as a child to groom or exploit a child;
• there is reason to believe a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent;
• the image or video appears to depict sexual acts that are unusual for the child's developmental stage or are violent;
• the image or video involves sexual acts and any child depicted is under 13; or
• there is reason to believe a child is at immediate risk of harm, for example because they are presenting as suicidal or self-harming.

Where none of the above applies, the School may decide to respond without involving the police or children's social care if the DSL is satisfied that there is sufficient information to assess the risks and that the risks can be managed within the School's pastoral and disciplinary framework. All incidents must be recorded whether or not they are referred externally. Decisions will be made by the DSL, with input from the Head where appropriate, in the best interests of the child and will be reviewed throughout the response.

This section does not apply where an adult over 18 creates or shares sexual imagery of a person under 18. Such conduct constitutes child sexual abuse and must be reported to the DSL immediately; the police should be informed as a matter of urgency.

What staff should do if a child is absent from education

Children who are absent from education, particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent pupils and children missing education 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. The School monitors attendance, absence and exclusions closely.

The DSL and Head of admissions will monitor unauthorised absence and take appropriate action including notifying the local authority particularly for children who go missing on repeated occasions and/ or are missing for periods during the day. The School will report to Devon County Council a pupil who fails to attend school regularly or has been absent from school without the school's permission for a period of 10 school days or more.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The School will report a pupil who fails to attend school regularly, or has been absent from school without the School's permission for a continuous period of 10 school days or more, to Devon County Council.

When working with local authority children's services, where school absence indicates safeguarding concerns, the School will have regard to the statutory DfE guidance *'Working together to improve school attendance'* and to the EYFS Statutory Framework for children aged 0-5 years.

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker as a result of safeguarding or welfare needs. Children may need this help because of abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
When working with local authority children's services, where school absence indicates safeguarding concerns, the School will have regard to the statutory DfE guidance 'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities' (July 2026) and to the EYFS Statutory Framework for children aged 0-5 years.

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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. Staff should not wait for a formal diagnosis before raising a concern with the DSL.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

Staff are encouraged to discuss any mental health concerns about pupils with our Heads of phases and Deputy Head Pastoral. Working together with parents and external agencies to support our pupils in the best way we can.

What staff should do if they have safeguarding concerns about another staff member
If staff have safeguarding concerns about another staff member (including supply staff, agency staff, trainee teachers, volunteers and contractors), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the school proprietor. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, trainee teachers, volunteers and contractors) and refer the matter directly to the designated officer(s) at the Devon County Council.

What staff should do it they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here' and even 'it does happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures, which can be found on the school website.There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line.Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment can occur between children of any age and sex, from primary age onwards. They may occur online and face to face and may overlap. Harmful sexual behaviour exists on a continuum from developmentally inappropriate or problematic behaviour to abusive or violent behaviour and may escalate if it is not recognised and addressed. Misogyny and misandry may form part of this behaviour. The School will respond to concerns early and proportionately and will not normalise or minimise harmful behaviour.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.
The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff

will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure, the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and be able to help. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers. They can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children.[57] The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School takes the following steps to minimise the risk of child on child abuse:

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them
- Assemblies are used to provide a moral framework, outlining acceptable behaviour and stressing the effects of bullying
- R and P, PSHE including RSE are used to reinforce the message through stories, role play, current affairs and other suitable activities.

- Tutors will know their tutor group well and be alert to pick up on changes in behaviour.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease at school.
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.
- Internal reporting systems are in place and promoted, understood and accessible.
- The school adopted a reflective approach, regularly reviewing decisions and actions and updating policies and procedures to reflect learning.

All allegations of child on child abuse should be passed on to the DSL immediately. A clear, detailed, factual record must be kept and updated with all actions. Any allegations will then be investigated and dealt with as follows:-

Information gathering: children, staff and witnesses will be spoken with, as soon as possible, to gather relevant information quickly, to understand the situation and assess whether there was intent to cause harm.

Decide on action: if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police.

Inform parents: as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police, before parents are contacted.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer harm', staff should follow the procedures[61] below rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Multi Agency Safeguarding Hub MASH on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police, in relation to allegations of abuse, the School will ensure that, subject to the advice of our safeguarding partners, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary. The School will have regard to the procedures set out in *KCSIE* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL {or DDSLs} who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL {or DDSL} will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the DFP Safeguarding Children referral process.

The School's approach to sexting includes educating parents and carers through safeguarding advice provided in information letters and educating pupils through the PSHE curriculum and in tutor time. When an incident is brought to our attention (in or out of school) the incident, if required, will be treated in line with our bullying policy and disciplinary action taken.

The School's approach to self-generated intimate images and/or videos includes educating parents and carers through safeguarding advice provided in information letters and educating pupils through the PSHE curriculum and in tutor time. When an incident is brought to our attention (in or out of school) the incident, if required, will be treated in line with our bullying policy and disciplinary action taken.

The School will follow the DDMSC / UKIS guidance "Sharing self-generated intimate images and/or videos: advice for education settings working with children and young people" March 2024 when responding to an allegation involving self-generated intimate images and/or videos, including AI-generated content such as deepfakes.

In the event of disclosures about child on child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL and Pastoral staff. When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;

- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child, in a way that avoids alarming or distressing them, that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.}

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken. This will help identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help themselves. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will

consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF (INCLUDING SUPPLY TEACHERS AND TRAINEE TEACHERS), VOLUNTEERS AND CONTRACTORS INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School, whether in a paid or unpaid capacity follows DfE statutory guidance and Devon County Council's Local Child Safeguarding arrangements and applies when staff (including volunteers) have (or are alleged to have):

- 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 indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

When dealing with an allegation about a staff member the School will apply common sense and judgement, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. Where

the Head is absent reports should be made to the DSL. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head or DSL is absent or is the subject of the allegation, reports should be made to the school proprietor. Where the Head or DSL is the subject of the allegation, the Head or DSL must not be informed of the allegation prior to contact with the school proprietor and LADO. However, staff may consider discussing any concerns/allegations with the DSL and make any referral via them.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

4. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

    - redeployment within the School, so that the individual does not have direct contact with the child or children concerned;
    - providing an assistant to be present when the individual has contact with children;

- redeploying to alternative work in the School so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff; this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made ensuring it is clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension; however, this will depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details.[97] The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

7. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or

disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

9. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

10. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed, the School ceases to use their services or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

11. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff and, whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and, potentially, their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances, a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.
Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help themselves. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where

the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

The School has arrangements in place for the use of school premises for non-school activities, including the availability of the DSL or DDSL and how they can be contacted.

DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)

A low-level concern is any concern 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. 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 (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The School has a separate Low-Level Concerns Policy Link to LLC policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's code of conduct can be found on the school website and on the daily briefing document. Code of Conduct The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

The procedure for sharing any such concerns confidentially is set out in the LLC policy. The Head is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to Jon Middleton, the Proprietor.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing or on a google form. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times.

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

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system, which may require additional training to be introduced and policies to be modified. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harm threshold, it will then follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work: right to

work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment.Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

As part of the shortlisting process, the School will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment

Full details of the School's safer recruitment procedures for checking the suitability of staff and volunteers to work with children and young people is set out in the School's Recruitment and Selection Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the school's visiting speakers procedure.

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day. Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. There are leaflets with key information near where visitors sign in and the school receptionist will draw attention to these and remind them of the importance of safeguarding. The Receptionist will determine whether any visitor should be escorted or supervised while on site.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Amy Hughes, who is a member of the leadership team.

In the absence of the DSL reports should be made to DDSLs. This ensures there is the required cover for the role at all times.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School has in place. The DSL works with the DDSLs and the board of reference to review and update the School's safeguarding policy.

Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible, within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL and/or DDSLs will always be available in person (during school hours) for staff in the School to discuss any safeguarding concerns. [If a DSL {or DDSL} is not available in person, they can always be contacted by telephone. The school receptionist is available to help. For out of hours/out of term activities, Amy can be contacted on 07809 411193. In the event that the DSL is not contactable the main school telephone number should be contacted (01395 272148)

The DSL {or DDSL} should liaise with the three safeguarding partners and work with other agencies in line with *WT*. "*NPCC - When to call the police*" can assist the DSL {or DDSL} to understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL {or DDSL} will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The DSL {and DDSL} should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse,neglect and Exploitation, are understood

and followed by all staff, and the board of reference are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

TRAINING

Induction and training are in line with advice including from the DCFP and ISBA.

All Staff

All new staff will be provided with induction training that includes:

- the child protection and safeguarding policy (including the policy and procedures to deal with child on child abuse)
- PREVENT and the schools responsibilities
- the role and identity of the DSL and any DDSL
- the behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- the staff's code of conduct, including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- a copy of Part one of *KCSIE* at least or, for staff that do not work directly with children, Annex A)
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE and Part five of KCSIE*
- Temporary staff and volunteers are also provided with a safeguarding induction.

All staff are also required to:

- Read at least Part one of *KCSIE* and confirm, by completion of the Google Form, that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via Safeguarding training at the beginning of each term.
- Understand key information contained in Part one or, for staff that do not work directly with children, Annex A of *KCSIE*. The School will ensure staff understanding by doing regular training and meeting with staff.
- Receive training in safeguarding and child protection regularly, in line with advice from the The Devon Safeguarding Children Partnership (DSCP) Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately, by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example: emails,notices in staff briefing, and staff meetings.

- All EYFS staff are required to attend safeguarding training specifically designed for staff

- Caring for 0-5 year olds which must cover all the areas set out in Annex C to the EYFS

- Statutory Framework: "Criteria for effective safeguarding training."

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

The proprietor is aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful

for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

DSL

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children, training in the approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

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

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children and to to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Jon Middleton is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. They are a member of the board of reference.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. A safeguarding audit and action plan is completed for DCC annually. The Board of Reference receive trembly reports on Safeguarding. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The school proprietor ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's computing curriculum and also embedded in PSHE and Relationships Education and/or Relationships and Sex Education ("RSE").

Filtering and monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's systems are driven by Smoothwall overseen by CAPTECH.

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

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. Within our school rules the pupils do not have access to their phones but we do not rule out the possibility that this could occur.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually in a formal minuted meeting. Reviews are carried out by the responsible SLT member with support from the DSL and IT support, include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and are recorded;

- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's Online Safety Policy y Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

<u>AI and technology</u>

The School recognises that artificial intelligence, including generative AI, presents both significant opportunities and safeguarding risks. The School is committed to ensuring that AI use is safe, ethical, transparent and aligned with its safeguarding obligations. Any proposed use of generative AI by staff or pupils will be carefully considered and the benefits and risks assessed in the School's context.

The School is alert to safeguarding risks arising from AI, including:

• the generation of deepfake images and AI-generated intimate imagery;
• AI chatbots producing harmful, inaccurate or age-inappropriate content;
• pupils deferring critical thinking to AI tools;
• the use of AI to facilitate grooming or exploitation or to create child sexual abuse material;
• compromise of pupil personal data through AI tools; and
• staff use of AI in a way that could compromise pupil safety or data security.

Any safeguarding or wellbeing concern arising from the use of AI must be reported to the DSL immediately. The DSL will investigate and determine whether external referral is required in accordance with this policy. Staff remain responsible for verifying AI-generated material before use and for ensuring that educational content is appropriate, accurate and safe.

1. Legal and Ethical Responsibilities

Schools must ensure that AI and technology use complies with existing safeguarding frameworks, including:

· Keeping Children Safe in Education (KCSIE) statutory guidance 1

· UK GDPR and Data Protection Act 2018

· Children's Online Privacy Protection and age-appropriate design codes · Plan technology for your school - GOV.UK · AI Cyber Security Code of Practice - GOV.UK

AI Use by Teachers

Teachers are permitted to use AI for tasks like lesson planning, marking, and admin. However, they must verify AI-generated content and ensure it is appropriate and accurate.

Final responsibility for safeguarding and educational content always lies with the teacher and school leadership.

AI Use by Pupils

Teachers can decide whether pupils may use AI tools, but must:

· Enforce age restrictions (many AI tools are 18+)

· Ensure close supervision

· Use tools with built-in safety and filtering features

Data Security and Privacy

Schools must manage data security risks associated with AI and cloud-based tools.

The National Cyber Security Centre (NCSC) provides guidance on:

· Cloud security

· Cyber defence

· Device safeguarding (filtering and monitoring) https://www.ncsc.gov.uk/

Policy and Oversight

While there is no single formal AI framework yet, the Department for Education (DfE) encourages schools to:

· Use AI ethically and cautiously

· Align AI use with existing safeguarding and data protection policies 3

· Develop internal policies for AI use, including acceptable use agreements and staff training

Relationships Education AND/OR Relationships and Sex Education ("RSE")

Relationships Education is compulsory for all pupils receiving primary education and RSE is compulsory for all pupils receiving secondary education (at St. Peter's, this relates to Years 7 and 8.) The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment.

The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education AND/OR RSE.}

Relationships Education AND/OR RSE will form part of the School's PSHE programme.

Looked after children

The Proprietor ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The DSL (Amy Hughes) is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can

critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

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

Visiting speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Arrangements for use of school premises for non-school activities

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

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

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times while the school premises are in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll. See above contact list.

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

When considering the safeguarding arrangements any providers have in place, the School will have regard to the DfE's non statutory guidance 'After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)

Arrangements for Off Site Activities

All Educational Visits require completion of a risk assessment and educational visits checklist. Safeguarding issues (including child on child abuse) are included as standard in all risk assessments with oversight and implementation of control measures to be implemented by the lead staff member.

Arrangements for Co-Curricular Activities

All external activity leaders delivering co-curricular activities in school are DBS checked and have a safeguarding induction. They are also required to provide risk assessments for their activities.

12.7 Arrangements for One to One Tuition

Staff must ensure that if they are in a one to one situation with a young person, that the door is either open or contains a glass panel and that another adult is aware of your meeting/lesson. Mandatory safeguarding training and recruitment checks apply to all staff, including peripatetic staff.

Arrangements for visiting specialists

Staff making arrangements for a visiting specialist to come into the school will need to notify HR in the School office. All visitors report to reception on arrival.

Arrangements for the use of school premises for non-school activities

Our pupils are supervised at all times and do not simultaneously use any facility in the school which is being hired out. Checks are conducted on companies or organisations hiring out school facilities.

Operation Encompass

The School is part of Operation Encompass, a national police and early intervention

safeguarding partnership which supports children who experience domestic abuse.

Through Operation Encompass the police are required to share information with the School

about all police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL

(known as the Key Adult) and inform us about the context of the incident and will include the child's perspective.

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The School's DSL and their deputy/ies have completed the National Online Operation Encompass Key Adult training. Staff will receive training on the prevalence of domestic abuse and the impact of this abuse on children.

Arrangements for Safeguarding

The school produces a safeguarding leaflet. As visitors report to reception their attention is drawn to the safeguarding leaflet. This document provides the contact details of the DSL and DDSLs, a summary of the key actions to take if a pupil makes a disclosure. A copy of the leaflet is provided to all staff at induction and is reviewed and re-issued annually (as a minimum) and in the event of a key change to safeguarding arrangements.

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

The School adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding paediatric first aid training, safer eating and children's privacy in relation to toileting and nappy changes.

The Designated Safeguarding Lead who takes lead responsibility for safeguarding children in the early years setting is: Lizzy Glanvill.

The School will inform Ofsted/ISI of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided.[209] For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment and Selection Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified, or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups, or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

Use of mobile phones and camera

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Online Safety Policy. When away on an off-site school trip or a sports fixture or match, staff are permitted to have their mobile devices with them and switched on. Staff are to only use their mobile devices for phone calls in case of emergency. The School may need to contact the member of staff due to pass on any urgent or emergency communication. Staff should not use mobile phones in front of children and should never

take photos of pupils using a personal device. Staff who wish to take photographs or video pupils on a school device must first check that none of the pupils concerned are on the school list of 'no photo/video consent given'. Before publication/use of any photo/video containing pupils, staff must have checked the individual photo consent provided for each child which is shown on schoolbase. Parents, visitors and others attending school events can take photographs and videos of those events for domestic purposes. For example, parents and visitors can take video recordings of a school performance involving their child. The School does not prohibit this as a matter of policy, unless to do so would breach the requirements of a show's licence or infringe copyright. We ask parents and visitors not to take photographs of other pupils on their own without the prior agreement of the child's parents and not to upload any photographs and videos to social media whereby a child, other than their own, is identifiable.

Duty to notify Ofsted/ ISI

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL or(DDSL)

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL {and DDSL}, 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), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online, as well as face to face. In many cases, abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online. This can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, 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 DSL (or DDSL)

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 (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children 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 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools 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.

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. 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.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of

children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. However, it can occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them; for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop, which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online

- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone, of any sex, can be a victim.

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, 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health;

preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased

status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of "deal line".

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*".

Cybercrime: is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DdoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill 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 DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre – NCSC.gov.uk.

Mental health: all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. 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.

Where children have suffered abuse,neglect and Exploitation, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL {or DDSL}.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.[241]

So called 'honour based' abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

● FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL {or DDSL} who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's

social care as appropriate.[246] If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18], teachers should follow the School's local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.]

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the *Multi-agency guidelines: Handling cases of forced marriage*. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.[250] 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 an extremist ideology, 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 susceptibility. Similarly,

radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, 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 susceptible and act proportionately, which may include making a Prevent referral. Designated Safeguarding Leads, and other senior leaders in colleges, should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL {or the DDSL,} who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

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 health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- 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.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

.Children who are lesbian, gay or bisexual: A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, children may be vulnerable to discriminatory bullying, and a pupil perceived by peers to be lesbian, gay or bisexual can be just as vulnerable whether or not that perception is correct. The School

will address these vulnerabilities, take steps to prevent bullying and provide appropriate support.

Safeguarding children with medical conditions: An incident relating to the management of a child's medical condition or allergy does not in itself require a safeguarding referral. However, the DSL will consider referral where an incident indicates that a child may be at increased risk of neglect, abuse or exploitation because of their medical condition. This may include circumstances where relevant information about the condition is not provided to the School or where a child is repeatedly sent to School without essential medication, thereby placing them at risk. The School will work collaboratively with healthcare professionals to identify and address safeguarding concerns arising from medical conditions.

Young carers: A young carer is a person under 18 who provides or intends to provide care for another person. Young carers may face additional safeguarding challenges because of the responsibilities they carry. Staff should be alert to signs that a child is taking on caring responsibilities that are inappropriate for their age or which may be affecting attendance, attainment or wellbeing. Concerns about a young carer should be discussed with the DSL.

Children who are questioning their gender: When supporting a child who is questioning their gender, the School will not initiate action on the child's behalf. The School will take time to understand the child's thoughts and feelings and will be appropriately professionally curious about the full range of the child's experiences. Staff will remain alert to potential vulnerabilities, including complex mental-health and psychosocial needs and discriminatory bullying. The DSL will be involved in all cases where a child is questioning their gender.

In making decisions about any proposed social transition, the School will comply with its safeguarding, equality and human-rights obligations. The School will not adopt changes relating to social transition unless a decision has been made by the School and the child's parents or carers have been involved. Parents will be involved in the vast majority of cases. In the rare circumstances where involving parents or carers would itself create a greater safeguarding risk, the DSL will determine what action is necessary to safeguard the child before parents or carers are contacted or decisions are taken.

The School complies with its obligations regarding the provision of toilets and washing facilities and will have regard to the relevant KCSIE provisions concerning single-sex spaces, changing rooms and sport.

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces 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. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of abusive behaviours, including physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological, emotional or other abuse such as honour abuse, faith- or belief-based abuse, forced marriage, female genital mutilation, reproductive coercion, harassment and stalking. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

Homelessness: Being homeless, or at risk of homelessness, presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness, including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and/or missing can be found in the School's Missing Pupil or Pupil Absence Policy. All unexplained absences will be followed up in accordance with the Absence Policy.

The School shall inform the local authority of any pupil who is going to be added to, or deleted from, the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).[259] This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident)] of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child

being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

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 (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

If a child decides to report abuse

1. Offer reassurance, listen and take seriously what is being said. Never promise to keep secrets or be persuaded by the child, young person or their family not to take action.

2. Recognise that it is not your job to investigate, verify what is being said or examine the individual disclosing; this is the statutory responsibility of the child protection services and/or the Police. However, it is important to ascertain relevant information.

3. Explain the process to the individual; that you will need to pass this information on, to whom, the reasons why and possible actions.

4. Any concerns will be recorded , including the child's voice, body map (if necessary) and other relevant information in line with our schools recording procedure. Concerns may also be shared with the DSL/DDSL verbally, these conversations will also be recorded in writing

Revision History		
Date Revised	**Changes**	**Reviewed By**
10.9.25	Title page updated to reflect new academic year and KCSIE 2025 references & new Safeguarding Team additions (KSG & VSE)	AKH
10.9.25	All references to residential settings and boarding removed	AKH
10.9.25	Guidance relating to AI and technology added	AKH
10.9.25	Link to NSPCC viewing Generative AI and children's safety added	AKH
10.9.25	E-Safety policy replaced with online Safety Policy	AKH
10.9.25	Extra information on the shortlisting process added	AKH
10.9.25	Extra information on the sharing of Nudes/semi nudes added	AKH
01.10.25	Key External Contacts List updated	AKH / SOC
10.09.2026	Added policies to Policy Statement Added section on effective safeguarding Replaced Information Sharing Section Replaced Early Help section Replaced responding to an incident of nudes Added info re working with local authority Replaced safeguarding concerns about another staff member Updated child on child allegations - sexual violence/harassment Added DDMSC/UKIS guidance Added section on AI and technology Updated section on lesbian, gay, bisexual pupils	AKH