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Safeguarding and Child Protection Policy St Peter & St Paul School

The policy will be reviewed annually as a minimum, unless lessons learnt or new legislation, national or local guidance suggests the need for an earlier date of review.

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1.0 Aims of this Policy.

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

2.0 Designated Senior Persons (DSPs) Safeguarding Children Team*:

Safeguarding Role	Name and Role	School/College contact details
Designated Safeguarding Lead (DSL)	Scott Nixon DSL	01246 278522 ext. 206 snixon@spsp.org.uk
Senior Leader(s) available for contact in the absence of the designated safeguarding lead	Thomas Newton Headteacher Alison Austin Senior Teacher	01246 278522 ext. 206 headteacher@spsp.org.uk 01246 278522 ext. 202 aaustin@spsp.org.uk
Designated Safeguarding Deputy (DSD)	Alison Austin Senior Teacher	01246 278522 aaustin@spsp.org.uk
Other staff with safeguarding responsibilities	Anne Camm Chair of Trustees	acamm@spsp.org.uk
SENDCo	Edward Gregory SEND CO	egregory@spsp.org.uk
Designated Safeguarding Trustee	Anne Camm Safeguarding link Trustee	acamm@spsp.org.uk
Designated Teacher for Looked After/ previously Looked After Children/ Children in kinship care	Scott Nixon DSL	snixon@spsp.org.uk
Senior Lead/s for Mental Health and Well-being	Thomas Newton Headteacher	headteacher@spsp.org.uk

*In the event that the DSL Mr Scott Nixon is absent, The DSD Mrs Alison Austin will deputise in the first instance. In the absence of the DSD, The Headteacher will deputise.

3.0 Key external agencies, services and professionals' contact details

	Derbyshire
Derby & Derbyshire Safeguarding Children Partnership	184 Kedleston Road, Derby, DE22 1GT Tel: 01332 642351 Email: ddscp@derby.gov.uk Web: https://www.ddscp.org.uk/
Early Help Advice	Starting Point Consultation and Advice Service for Professionals Tel: 01629 535353
Targeted Early Help requests	Requests for support from professionals, should be made via the online request for support unless a child is at risk of Significant Harm



	Derbyshire
Speak to a Social Worker for thresholds advice and consultation	Starting Point Consultation and Advice Service for Professionals Tel: 01629 535353
Referrals to Local Authority Children's Social Care	Starting Point <ul style="list-style-type: none"> • Urgent: 01629 533 190 • Non urgent: Starting Point online
Local Authority Designated Officer (LADO)	Derby and Derbyshire LADO referral form Email: professional.allegations@derbyshire.gov.uk
Derbyshire Police	<ul style="list-style-type: none"> • 999 for emergencies or 101 for non-emergencies • Mandatory reporting of Female Genital Mutilation (FGM) via 101 • School Police Safer neighbourhood team https://www.derbyshire.police.uk/area/your-area/local-policing-team-contact/contact-your-local-policing-team/
Prevent (radicalisation and extremism)	<ul style="list-style-type: none"> • Police Prevent (radicalisation/extremism) Team on 101 or directly via 0300 1228694. • Prevent/channel referral form • For advice contact: Derbyshire – 01629 538473 or prevent@derbyshire.gov.uk
Education Welfare and Local Authority Children Missing Education (CME) Officer	<ul style="list-style-type: none"> • Derbyshire Education Welfare Services • CME: CS.CMECoordinators@derbyshire.gov.uk • See Children missing from education (CME) policy and guidance and removal from school roll for further information
Virtual School for Looked After Children	Helen Moxon, interim virtual school headteacher, telephone: 01629 538028 or email virtualschool@derbyshire.gov.uk
Emotional Health and Well-being Services	Child and Adolescent Mental Health Services Chesterfield Royal Hospital Advice: CRHFT.camhscas@nhs.net Urgent referral: 01246 514412
Domestic Violence / Abuse	<ul style="list-style-type: none"> • Safer Derbyshire domestic abuse webpage • Derbyshire constabulary – information and advice about domestic abuse webpages
Harmful Sexual Behaviour Service	Action for Children Pathway Programme Service for harmful sexual behaviours. Please note this service is for children in Derbyshire who are living with their birth family: pathwayservice@actionforchildren.org.uk
Cyberchoices	For children at risk of being drawn into cybercrime via East Midlands Cyber Secure
Homelessness or at risk of homelessness	Chesterfield Homelessness Prevention Team 01246 345825 homelessness.prevention@chesterfield.gov.uk



Key National Contacts

Organisation	Description and contact details
NSPCC helpline for adults	Helping adults protect children 24 hours a day. For help and support, including anyone needing advice about female genital mutilation, young people affected by gangs, concerns that someone may be a victim of modern slavery contact the NSPCC trained helpline counsellors on: <ul style="list-style-type: none"> • Text 88858 • 0808 800 5000 • help@nspcc.org.uk
NSPCC helpline Report Abuse in Education	Bespoke helpline for children and young people who have experienced abuse at school, and for worried adults and professionals who need support and guidance: <ul style="list-style-type: none"> • 0800 136 663 • help@nspcc.org.uk
NSPCC Whistleblowing Advice	Free advice and support for professionals concerned about how child protection issues are being handled in their organisation: <ul style="list-style-type: none"> • 0800 028 0285 • help@nspcc.org.uk
UK Safer Internet Centre professional advice line	Helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care: <ul style="list-style-type: none"> • 0844 381 4772 • helpline@saferinternet.org.uk
Police Anti-Terrorist Hot Line number	0800 789 321
National Domestic Abuse Helpline	Hosted by Refuge , Helpline 0808 2000247
Operation Encompass	Resources for schools include free advice from an Education Psychologist about how best to support children via National Helpline 0204 513 9990
Report harmful online content	<ul style="list-style-type: none"> • UK Safer Internet Centre – report online harm. A national reporting centre that has been designed to assist anyone in reporting harmful content online. • CEOP – to report online sexual abuse or the way someone has been communicating online
Report Abuse in Education helpline	<ul style="list-style-type: none"> • Young people who have experienced abuse at school and parents and teachers who are concerned about sexual abuse in education settings can call the Report Abuse in Education helpline on 0800 136 663 or email help@nspcc.org.uk
Harmful Sexual Behaviour Support Services	<ul style="list-style-type: none"> • SWGfL Harmful Sexual Behaviour Support Service for the children’s workforce 0344 2250623 or email hsbsupport@swgfl.org.uk • Stop it now! For worries about a child’s sexual behaviour, 0808 1000 900



4.0 Key Definitions

Safeguarding

This is broader than child protection, and includes:

- Protecting children from maltreatment.
- Preventing the impairment of children's mental and physical health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.
- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, inside or outside the home, including online.

LADO

Local Authority Designated Officer(s) for Child Protection. Each Local Authority should have designated a particular officer, or team of officers, to be involved with the management and oversight of allegations against people that work with children. The term 'LADO' in this document is used for convenience to designate these local authority designated officer(s) or other appropriate first point of contact for child protection concerns, whatever terminology the local safeguarding partners may use.

A full list of key terms is set out in Appendix 6.

5.0 Introduction

1. St Peter & St Paul School is fully committed to the safeguarding and welfare of children and expects all members of the school community to share this commitment. The school community forms part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone's responsibility. To fulfil this responsibility all professionals should adopt a child-centered approach, and consider, at all times, what is in the best interests of the child.
2. The Department for Education's (DfE) statutory guidance 'Keeping Children Safe in Education' (September 2025) defines safeguarding and promoting the welfare of children as '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.' **Children includes everyone under the age of 18.**
3. Staff are advised to maintain an attitude of 'It could happen here' where safeguarding is concerned. If staff are concerned about the welfare of a child, they should always act in the best interests of the child. If staff are unsure about any aspect of safeguarding, they should immediately speak to the Designated Safeguarding Lead (DSL), or a deputy DSL, without delay, and should not assume that a colleague will raise the matter and share information that may keep a child safe. Details of the school's DSL and deputy DSLs are set out in the grid on page 2.
4. This is a whole school policy which applies from the Early Years Foundation Stage (EYFS) to Year 6 and to all adults, staff, volunteers, supply staff & contractors working within the school.
5. This policy is available on the school website.



6. This policy must be read in conjunction with the following:

- Acceptable Use Policy
- Anti-bullying Policy
- Attendance Policy
- Behaviour Policy
- Code of Conduct for Staff
- Data Protection Policy inc GDPR
- ICT Acceptable Use Policy
- Online Safety Policy
- Personal, Social, Health and Education Policy
- Recruitment and Selection Policy
- Mental Health & Wellbeing Policy
- Low Level Concerns (see page 30)
- Whistleblowing Policy

You may also email the school at reception@spsp.org.uk to request hard copies, which can be made available in large print or other accessible formats if required.

This is informed by statutory government legislation and is in line with Derby & Derbyshire Safeguarding Children Partnership Policy & Procedures. (DDSCP).

6.0 Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities (SEND).
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.

7.0 Statutory and Regulatory Framework

This policy complies with or has regard to the following:

- [Working Together to Safeguard Children \(2023\)](#)
- [Keeping children Safe in Education \(September 2025\)](#)
- [The Education \(Independent School Standards\) Regulations \(2014\)](#)
- [Early Years Foundation Stage \(EYFS\) Statutory Framework \(2025\)](#)
- [Disqualification under the Childcare Act 2006 \(August 2018\)](#)
- [What to do if you're worried a child is being abused: advice for practitioners \(March 2015\)](#)
- [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(July 2018\)](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(Sept 2020\)](#)



- [Multi-agency guidance on female genital mutilation \(July 2020\)](#)
- [Designated teacher for looked-after and previously looked-after children \(2018\)](#)
- [Prevent Duty Guidance \(2024\)](#)
- [Human Rights Act \(1998\)](#)
- [Equality Act \(2010\), including the Public Sector Equality Duty](#)
- [Data Protection Act \(2018\) and UK GDPR](#)
- [DFE Data Protection in Schools 2023](#)
- [Derby and Derbyshire Multi-agency Safeguarding Children procedures](#)

8.0 Scope and Responsibilities

1. All members of the school community, including but not limited to, the Headteacher, staff, trustees, pupils, parents, visitors, volunteers, supply staff and external hirers are expected to comply with this policy and its procedures. It applies wherever members of the school community are working with pupils even where this is away from the school, for example at an activity centre or on an educational visit.
2. It is the responsibility of the Board of Trustees to ensure that the school complies with its legislative duties and has regard to the Department for Education's guidance, 'Keeping Children Safe in Education' to ensure that the school's policies, procedures and training are effective and comply with the law. The Headteacher will constantly monitor the effectiveness of the implementation of this policy and will revise it where necessary. The Headteacher will ensure that any changes to this policy will be drawn to the attention of all staff.
3. The Board of Trustees has nominated one of its members to manage child protection incidents on behalf of the Board and to liaise with external agencies where required. The nominated Safeguarding Trustee is Mrs Anne Camm.
4. The DSL's responsibility is to maintain an overview of safeguarding within the school, ensure that training for all members of staff is compliant, to maintain open channels of communication with local statutory agencies, support staff in carrying out safeguarding duties, encourage a culture of listening to pupils and to monitor the effectiveness of policies and procedures in practice.

9.0 Early Help

All staff play an important role in safeguarding and promoting the welfare of children and should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. This may be done for example, by immediately speaking with the DSL, regarding any concerns or emerging issues and sharing information with other professionals to support early identification of children in need of help. Taking these steps may prevent concerns from escalating.

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 and has specific additional needs.
- has special educational needs (whether or not they have a statutory Education, Health and Care plan).
- is a young carer.



- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement.
- is frequently missing/goes missing from care or home.
- is misusing drugs or alcohol.
- is at risk of modern slavery, trafficking or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalized or exploited.
- is a privately fostered child.
- is frequently missing/is absent without explanation from education.
- has experienced multiple suspensions and is at risk of being permanently excluded from schools.
- has a parent or carer in custody or is affected by parental offending.

The school will also be alert to the potential need for early help for a child who comes from a split family, looked after children, previously looked after children and care leavers. The DSL will inform the class teacher about the child's circumstances. The class teacher will monitor the child and put in place any necessary special arrangements and support.

More information on early help is set out in Part one KCSIE (September 2025) of this guidance with full details of the early help process in *Working Together to Safeguard Children (2023)*.

10.0 Contextual Safeguarding

All staff, including the DSL and his deputies should consider the context within which safeguarding incidents and/or behaviours occur. This is known as 'contextual safeguarding'. Professionals should consider whether wider environmental factors are present in a child's life that are a threat to their welfare. Contextual safeguarding looks at how we can better understand these risks and engage with children and young people in order to help to keep them safe.

The DSL, and their deputies where appropriate, are most likely to have a complete safeguarding picture and be the most appropriate people to advise on the response to safeguarding concerns. However, in the unlikely event of both DSLs and all deputy DSLs being unavailable, staff must speak to a member of the Senior Leadership Team regarding any safeguarding concerns and/or take advice from DDSCP Starting Point. In these circumstances, the DSL or a deputy DSL should be informed of any action taken as soon as possible.

11.0 Confidentiality

The HM Government 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. Staff should be mindful that sharing information at an early stage is essential for effective safeguarding and promoting the welfare of children. Page 4 of this advice sets out the seven golden rules to sharing information, whilst page 5 confirms that "The General Data Protection Regulation and the Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young

people safe". Page 19 of Working Together to Safeguard Children contains a useful myth-busting guide to information sharing within a safeguarding context.

If in doubt about information sharing, a member of staff should ask the DSL for advice.

A member of staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interest.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that practitioner gains consent, or if to gain consent would place a child at risk.

12.0 Derby & Derbyshire Safeguarding Children Partnership – Strategy

The school recognises its responsibility to put in place effective procedures both for detecting and preventing abuse and for ensuring that parents, staff and trustees are aware of the school's role in this respect, in line with locally agreed inter-agency procedures. The school's three safeguarding partners are the Local Authority (LA), the Derbyshire Clinical Commissioning Group and Derbyshire Police.

13.0 Summary of Reporting Procedures

1. If a member of the school community suspects or discovers that a pupil is the victim of abuse, whether physical, emotional, sexual or as a result of neglect, they must immediately inform the school's DSL, or their deputies, except in the case of an allegation which itself involves a DSL, in which case the matter should be reported directly to the Headteacher in accordance with the procedures set out in Appendices 2 and 3.
2. If the suspicion relates to a member of staff, including a DSL, volunteer, supply staff, or the Headteacher, the matter must be dealt with in accordance with the procedures set out in Appendix 4.
3. Contact details for the Derby & Derbyshire Safeguarding Children Partnership (DDSCP), the Local Authority Designated Officer (LADO) for Child Protection and other bodies mentioned in this policy are located on pages 2-5.

14.0 Types of Abuse, Neglect and Exploitation

All staff should be aware that, firstly, abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition. Often, multiple issues will overlap with one another. Secondly, harmful behaviours such as substance abuse, sexting and truanting can put children in danger, and thirdly, that safeguarding incidents and behaviours can be associated with factors outside the school and can occur between children outside of these environments.

All staff, but especially the DSL and his deputies should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including but not limited to sexual exploitation, criminal exploitation, and serious youth violence.

Keeping Children Safe in Education defines types of abuse and neglect as follows:



- Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse: 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 as far 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 a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.



15.0 Specific Forms of Abuse and Safeguarding Issues

Annex B of Keeping Children Safe in Education contains information about specific forms of abuse and safeguarding issues including:

Children missing from education: a child going missing from education, particularly repeatedly, is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. It may indicate mental health problems, risk of substance abuse, risk of traveling to conflict zones, risk of Female Genital Mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Staff should follow the school's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. The school's procedures are set out in the Attendance Policy. The Designated Safeguarding Leads will monitor unauthorised absence, particularly where children go missing on repeated occasions.

The school will fulfil its statutory duty in notifying the Local Authority (Derbyshire) when adding or removing a pupil's name from the admission register outside of the usual transition points i.e., where a compulsory school-aged child leaves a school before completing the school's final year or joins a school after the beginning of the school's first year. The school will make reasonable enquiries to establish the whereabouts of the child jointly with the Local Authority before deleting their name from the register and will also notify the Local Authority within five days of adding a pupil's name at a non-standard transition point. Please see ['Working Together to Improve Attendance \(2024\)'](#) for further guidance.

Child Sexual Exploitation and Child Criminal Exploitation: are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or increased status of the perpetrator or facilitator.

Child Sexual Exploitation and Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Like all forms of abuse, exploitation:

- 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.
- can still be abuse even if the sexual activity appears consensual.
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- can take place in person or via technology, or a combination of both.
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posting on social media).
- can be perpetrated by individuals or groups, males or females, and children or adults.
- can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex recognised abuse.
- is typified by some form of power imbalance in favour of those perpetrating the abuse.

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.



Some of the following signs may be indicators of Child Criminal Exploitation:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people 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
- children who regularly miss school or education or do not take part in education.

The above Child Criminal Exploitation indicators can also be indicators of Child Sexual Exploitation, as can:

- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant.

County lines: is a term used by the UK Government to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

So-called ‘Honour-based’ abuse: So-called ‘honour-based’ abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation, forced marriage, and practices such as breast ironing.

Serious violence: 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, 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. Links to further guidance/advice can be found at Appendix 6.

Female Genital Mutilation (FGM): comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Whilst all staff should speak to the DSL, or a deputy DSL, with regard to any concerns about FGM, there is a specific legal duty upon teachers to personally report to the police cases where they discover that an act of FGM is suspected or appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Staff failing to report such cases will face disciplinary sanctions.

It is also school policy that any member of staff, other than a teacher, should follow the above procedure where they discover an act of FGM appears to have been carried out, as this represents best practice.

The member of staff should still discuss any such case with the Designated Safeguarding Lead and involve Children’s Social Care as appropriate. The duty does not apply in relation to at risk or suspected cases i.e., where the teacher does not discover that an act of FGM appears to have been carried out or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

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. The school has a separate policy for mental health and wellbeing, which will be made available upon request.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe pupils 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 and neglect, or other 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 and education.

If staff have a mental health concern about a child that is also a safeguarding concern, they must immediately speak to the DSL or a deputy or the Safeguarding Mental Health Lead, Mr Thomas Newton.

The department 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 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.

Forced marriage: A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Forcing a person into a marriage is a crime in England and Wales. There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses.

Domestic abuse: is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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 which explain each step of the process and support and special measures available:



<https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>
<https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

Children with family members in prison: 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) provide an information service for all professionals who come into contact with the children and families of offenders. Further information can be found here: <https://www.nicco.org.uk/>

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL, and any deputies, should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

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. 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.

Where there are concerns about a specific incident, advice should be sought from the police and/or the Education Safeguarding Service when sharing information with the wider school/setting community. More general information is available at www.actionagainstabduction.org and www.clevernevergoes.org.

Modern slavery and the National Referral Mechanism: The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

Modern slavery is a complex crime and may involve multiple forms of exploitation. It encompasses:

- human trafficking
- slavery, servitude, and forced or compulsory labour

An individual could have been a victim of human trafficking and/or slavery, servitude and forced or compulsory labour.

Victims may not be aware that they are being trafficked or exploited, and may have consented to elements of their exploitation, or accepted their situation. If you think that modern slavery has taken place, the case should be referred to the NRM so that the relevant competent authority can fully consider the case. You do not need to be certain that someone is a victim.



Cybercrime: “Cybercrime is a 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)” (KCSIE, September 2025)

Staff should be aware of the appropriateness of the content pupils are accessing and school has robust systems in place to ensure that the opportunity for cybercrime is minimised.

Sexual violence and Sexual Harassment: can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single group or group of children and can occur online and offline. It is important that all victims are taken seriously and offered appropriate support.

Staff should be aware that girls, children with Special Educational Needs and Disabilities and LGBT children are at greater risk.

In addition to the above, KCSIE (September 2025) Annex A also lists Children and the court system, Children with family members in prison and Child criminal exploitation as specific forms of abuse and safeguarding issues. Further guidance/advice regarding all of the above can be seen at Appendix 6.

Preventing radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. It can happen in many different ways and settings. The school and its staff have a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

The Government’s Counter Extremism Strategy defines ‘Extremism’ as: “the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.”

The school seeks to promote an understanding of and commitment to fundamental British values such as democracy, the rule of law, individual liberty, tolerance and respect for other people. Pupils are able to discuss sensitive topics, including terrorism and extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent duty is not intended to limit discussion of these issues and the school and its staff should be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

We recognise that misinformation, disinformation and conspiracy theories are safeguarding harms. As with other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may need help or protection. Staff should use their judgment in identifying children who might be at risk of radicalisation and act proportionately. Staff are encouraged to discuss their concerns with the Designated Safeguarding Leads who can advise on assessing the level of risk to identify the most appropriate referral, which could include making a referral to the Channel programme or DDSCP Starting Point.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to



radicalisation. It is a voluntary process which allows the individual to withdraw from the programme at any time.

All staff are encouraged to familiarise themselves with the government's website <https://educateagainsthate.com/>. The website is designed to equip school leaders, teachers, staff and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people.

The school has a risk assessment process in place for considering and protecting children at risk of radicalisation and extremism.

16.0 Signs of Possible Abuse

Possible signs and behaviours which may indicate that a child is being abused include, but are not limited to:

- significant changes in children's behaviour.
- deterioration in children's general well-being.
- unexplained bruising, marks or signs of abuse or neglect.
- children's comments which give cause for concern.
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home.
- inappropriate behaviour displayed by other members of staff, for example excessive one to one attention beyond usual role or responsibilities.
- repeated minor injuries.
- children who are dirty, smelly, poorly clothed or who appear underfed.
- children who have lingering illness which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums.
- an air of "detachment" or "don't care" attitude.
- overly compliant behaviour.
- a "watchful attitude."
- sexually explicit behaviour (e.g., playing games and showing awareness, which is inappropriate for the child's age).
- a child who is reluctant to go home or is kept away from school for no apparent reason.
- does not trust adults, particularly those who are close.
- "tummy pains" with no medical reason.
- eating problems, including over-eating, loss of appetite.
- disturbed sleep, nightmares, bed wetting.
- running away from home, suicide attempts.
- self-inflicted wounds.
- reverting to younger behaviour.
- depression, withdrawal.
- relationships between child and adults which are secretive and exclude others.
- Pregnancy.

These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

Staff should bear in mind that additional difficulties may exist when recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration, that children with SEND can be disproportionately

impacted by, for example, bullying without outwardly showing any signs, and there can be communication barriers in overcoming these difficulties.

17.0 Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. 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 online and offline, both physically and verbally, and are never acceptable.

Sexual offences under the Sexual Offences Act 2003 are defined as follows:

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

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Within this policy, sexual harassment is referred to in the context of child-on-child sexual harassment.

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 but is not limited to:

- 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 and displaying pictures, photos or drawings of a sexual nature.
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation
 - upskirting.

It is important that all victims are taken seriously and offered appropriate support. It is essential that all victims are reassured that they are being taken seriously and that they will be supported

and kept safe. The victim should never be made to feel that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

If a pupil makes a disclosure directly to a member of staff or volunteer, he/she must follow the process as set out under 'What to do if a pupil makes a disclosure' on page 24 and Appendix 2 of this policy. Staff are reminded not to view or forward illegal images of a child.

When there has been a report of sexual violence, the DSL, or their deputies, should 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.

Victims may not disclose the whole picture immediately and may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged and the school will ask the victim if they would find it helpful to have a designated trusted adult to talk to about their needs. The choice of any such adult should be the victim's and the school will respect and support this choice.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and lesbian, gay, bi, trans or questioning their gender (LGBT) children are at greater risk.

18.0 Relationships and Sex Education (RSE)

The Relationships Education, Relationships and Sex Education and Health Education Regulations (England) Regulations 2020 states that pupils receiving primary education must be taught Relationships Education, and pupils receiving secondary education must be taught Relationships and Sex Education.

Personal, Social, Health Education (PSHE) continues to be compulsory in independent schools; the school provides PSHE lessons from Reception to Prep 6.

The DfE guidance gives schools freedom to deliver the content set out in the guidance in the context of a broad and balanced curriculum. The school delivers RSE as set out in the curriculum plan as part of our Jigsaw PHSE programme.

The school seeks to work in partnership with parents to enable parents to feel confident about the Relationships and Sex Education programme, and that it will be delivered sensitively and inclusively respecting backgrounds and beliefs. The school Relationships and Sex Education Policy can be found on the school website.

19.0 The use of reasonable force or physical restraint

Physical restraint: All forms of corporal punishment are unlawful; the school does not use or threaten corporal punishment. The use of unwarranted physical force is likely to constitute a criminal offence. The use of physical intervention should be avoided if possible. There are circumstances when it is appropriate for staff to use force to safeguard children. This is enshrined in law and applies to any member of staff at the school. It can also apply to people whom the Headteacher has temporarily put in charge of pupils, such as unpaid volunteers or parents accompanying pupils on a school organised visit.



1. **Application of code of restraint:** This only applies where no other form of control is available and where it is necessary to intervene. The use of force or physical contact may be reasonable and proportionate in the circumstances to prevent a pupil doing, or continuing to do any of the following:
 - Committing a criminal offence
 - Injuring themselves or others
 - Causing damage to property, including their own
 - Engaging in any behaviour prejudicial to good order and discipline at the school or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

2. **Before intervening:** Before intervening physically staff should, wherever practicable, tell the pupil to stop and what will happen if she does not. Staff should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. Staff should always avoid touching or holding a pupil in a way that might be considered indecent. Staff should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury.

3. **Inform senior staff:** Staff should inform the Headteacher immediately following an incident, except the most minor or trivial, where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. Staff should provide a written report as soon as possible afterwards. This should include written and signed accounts of those involved, including the pupil. The parents, guardians or carers of the pupil should be informed about serious incidents involving the use of force. In the EYFS setting, the parents, guardians or carers will be informed about any use of force on the same day or as soon as it is practical. The Headteacher will advise as to when parents should be contacted.

4. **Action taken in self-defence or in an emergency:** The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.

5. **Using reasonable force:** There is no legal definition of "reasonable force". It will always depend on the circumstances. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed.' The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Note that:
 - Any use of force should be proportionate to the behaviour of the pupil involved and the seriousness of the harm prevented.
 - Staff should recognise the additional vulnerability of children with SEN, disabilities and certain medical conditions before using reasonable force.
 - Physical force could not be justified to prevent a pupil from committing a trivial misdemeanor.
 - Any force should always be the minimum needed to achieve the desired result.



- Whether it is reasonable to use force and the degree of force that could be employed might also depend on the age, understanding and sex of the pupil.

20.0 Designated Safeguarding Lead

The DSL is a member of the Senior Leadership Team and takes day to day lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems in place (see [Generative artificial intelligence \(AI\) in education](#)). The school will ensure that the DSL is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Parents are welcome to approach the appropriate DSL if they have any concerns about the welfare of any child in the school, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's class teacher who will notify the relevant DSL in accordance with these procedures.

In accordance with Annex C of Keeping Children Safe in Education, the main responsibilities of the DSL are:

Managing referrals

- To take lead responsibility for promptly referring all cases of suspected abuse of any pupil at the school to DDSCP Starting Point.
- To support staff who make direct referrals to DDSCP Starting Point.
- To refer cases to the Channel programme where there is a radicalisation related concern.
- To support staff who make direct referrals to the Channel programme.
- To take lead responsibility for promptly referring to the Local Authority Designated Officer all child protection concerns which involve a member of staff.
- To take lead responsibility for promptly making referrals to the Disclosure and Barring Service (DBS) (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child.
- To take lead responsibility for promptly making referrals to the police where a crime may have been committed which involves a child.

Working with others:

- To act as a point of contact with the three safeguarding partners.
- To take lead responsibility in early help cases and liaise with other agencies.
- To liaise with the Headteacher in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the school.
- To liaise with the 'Case Manager' and Local Authority Designated Officer regarding all child protection concerns which involve a member of staff.
- To liaise with staff (especially pastoral support staff, SENDCo, IT Technicians and SEND advisors) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.



- To liaise with the school IT support services (NX control) to ensure that the school's Filtering and monitoring systems are functional and effective and in line with statutory guidance.

Raising awareness

- To ensure this policy is known, understood and used appropriately.
- To ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board of Trustees regarding this.
- To ensure this policy is available publicly.
- To ensure that parents are aware that referrals about suspected abuse or neglect may be made known to DDSCP and the school's role in this.
- To maintain links with the Derby & Derbyshire Safeguarding Children Partnership.
- To ensure staff are aware of training opportunities and the latest local policies on safeguarding.
- To help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and Senior Team.
- To ensure that the school's PSHE programme teaches pupils about safeguarding, including safer use of the internet and social media.

Child Protection file

- Where children leave the school, to ensure their child protection file is copied for any new school or college as soon as possible, but transferred separately from the main pupil file, ensuring secure transit, and obtaining confirmation of receipt.
- Consider whether it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue support and have that support in place for when the child arrives.
- Child protection files are securely stored securely using the MyConcern digital reporting system.
- The school retains child protection files indefinitely where a referral has been made/social care have been involved or a child has been the subject of a multi-agency plan. Where there are concerns with no multi-agency involvement, the school will keep the child protection file for 25 years from date of birth.

Undertake training

- To undergo training, at least every two years, to acquire the knowledge and skills required to carry out the role.
- To undertake Prevent awareness training.
- To ensure knowledge and skills are refreshed at regular intervals, as required, but at least annually to keep abreast of developments relevant to their role so they:
 - Understand the assessment process for providing early help and intervention.
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and effectively contribute when required to do so.
 - Ensure each member of staff has access to and understands this policy and child protection procedures, and in particular, new and part-time staff.
 - Are alert to the specific needs of children in need, those with special educational needs and young carers.
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.



- Are able to keep detailed, accurate, secure written records of concerns and referrals.
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalization.
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online.
- Can recognise the additional risks that children with Special Educational Needs and/or Disabilities face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with Special Educational Needs and/or Disabilities to stay safe online.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measure the school puts in place to protect them.

21.0 What to do if a pupil makes a disclosure.

If a pupil discloses directly to a member of staff or volunteer, he/she:

- Must listen carefully to what is said, using active listening techniques, and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
- Must only ask open questions such as, "How did that happen?" 'What was happening at the time?' or 'Is there anything else you want to tell me?'
- Must not ask leading questions which may be considered as suggesting what might have happened, or who has perpetrated the abuse, as this can later be interpreted as putting ideas into the child's mind.
- Must not interrupt the child when he/she is speaking.
- **MUST NEVER GIVE UNDERTAKINGS OF ABSOLUTE CONFIDENTIALITY TO A PUPIL;** breaking a child's confidence would be inappropriate, it is better to say that you might have to tell another adult who will ensure the correct action is taken.
- Should reassure the child they have done the right thing and tell them they are not to blame.
- Must make notes of the details of the disclosure using the Safeguarding Concern Form (Appendix 1), using the child's words where possible. This note should be made immediately and be handed straight to the DSL or, if he is unavailable, the DSD.
- Should offer ongoing support.

Records:

- should be accurate and descriptive, including the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence.
- must not make assumptions.
- must not include any opinions.
- should indicate sources of information.
- should be clear and concise.
- should be signed by the person making it and use names, not initials.
- should be kept securely and handed to the DSL as soon as possible.
- should include all evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers and must be preserved and passed to the DSL.
- will be kept securely within applicable pupil files on the school's database, My Concern.
- the retention period for the records will vary depending on the nature of the disclosure.



All suspicions or complaints of abuse must be reported immediately to the relevant DSL (except in the case of an allegation which itself involves a DSL; in which case the matter should be reported directly to the Headteacher in accordance with the procedures set out in Appendices 2 & 3).

All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing and securely stored by the DSL.

If there is a risk of immediate serious harm to a child and it is not possible to report to either the DSL, DSD or the Headteacher, a referral should be made to DDSCP immediately.

22.0 What to do if you have a mental health concern.

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 will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in appendix 2.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. This may include raising the pupil as a pastoral concern within briefing or staff meeting, creating a support plan with the involvement of the SLT and parents.

For further guidance, refer to the DfE's guidance on [mental health and behaviour](#) in schools and the school's Mental Health and Wellbeing Policy.

23.0 Confidentiality and Communicating with Parents

1. Staff, supply staff or volunteers who receive sensitive information about children and their families should only share this information with appropriate professionals.
2. Parents will be made aware of the school's Safeguarding and Child Protection Policy and its availability on the school website.
3. Parents should be informed prior to referrals being made to other agencies, unless to do so might place the child at further risk or cause evidence to be removed or destroyed.
4. The DSL will ensure that the school's information sharing arrangements comply with government guidance. Any written communications containing sensitive information must only be sent to other professionals on a need-to-know basis, using secure mail processes e.g., secure email.

24.0 Investigation, referral and reporting

The Trustees will ensure that staff and volunteers are aware that it is their responsibility to:

- protect children from abuse.
- be aware of the school's child protection procedures in this policy.
- know how to access and implement the procedures, independently if necessary.



- report any matters of concern to the DSL.
- undertake appropriate training, including refresher training, which will be updated regularly in accordance with DDSCP requirements.

It is not the responsibility of school staff to investigate suspected abuse. The school is not an investigation or intervention agency for child protection, but it has an important role to play at the recognition and referral stages. The school will take into account the procedures published by DDSCP when dealing with allegations of abuse.

On being notified of a complaint or suspicion of abuse, the DSL will:

- operate safeguarding procedures in line with DDSCP.
- consider the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to Children and Family Services and the police.
- consider the wishes or feelings of the pupil. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, which override a pupil's wishes.
- consider duties of confidentiality, as far as applicable.

If there is doubt over whether a referral should be made, the DSL will consult with DDSCP Starting Point. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to DDSCP Starting Point will be made without delay (and in any event within 24 hours). If the initial referral is made by telephone, the DSL will confirm the referral in writing to DDSCP Starting Point within 24 hours. DDSCP Starting Point should make a decision within one working day of a referral being made about what course of action they are taking and should inform the referrer of the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required; whether the child is in need and should be assessed.
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the child assessed.
- any services are required by the child and family and what type of services.
- further specialist assessments are required in order to help the local authority to decide what further action to take.

If no response or acknowledgement is received within one working day, the DSL, or the referrer, should follow up on the referral.

The DSL will keep the Headteacher informed of the case unless the complaint involves the Headteacher in which case the Chair of the Board of Trustees will be consulted.

Staff must not investigate suspected abuse or any allegations against other staff themselves.

If the child's situation does not appear to be improving, the DSL or the staff member with concerns should consider following local escalation procedures to ensure concerns have been addressed and that the child's situation improves.

Children in need: A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.



In circumstances where a pupil has not suffered and is not likely to suffer significant harm but needs additional support from one or more agencies, the DSL will liaise with DDSCP Starting Point and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary.

Children at risk: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, to enable them to decide whether they should take any action to safeguard and promote the child's welfare. Under section 31 (10) of the Children Act 2004, the question of whether harm suffered by a child is significant relates specifically to the child's health and development. Their health or development should be compared with that which could reasonably be expected of a similar child and the parenting that we would reasonably expect them to receive from their parent/carer.

All pupils identified as children in need or children at risk will be provided with the appropriate levels of pastoral support led by a DSL in conjunction with class teachers.

25.0 Early Years Foundation Stage (EYFS)

The school will inform Ofsted of allegations against people working at the premises, or of any other abuse alleged to have taken place on the premises, as soon as practicable and within 14 days at the latest.

26.0 Children potentially at greater risk of harm

Children who need a social worker (Child in Need and Child Protection Plans). Children may need a social worker due to safeguarding or welfare needs. Local authorities should share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

Children requiring mental health support - schools have an important role to play in supporting the mental health and wellbeing of pupils. For further information see 'Mental Health' on page 11.

27.0 Allegations of abuse made against staff, supply staff, trustees, contractors and volunteers

St Peter & St Paul School has procedures for dealing with allegations against members of staff (and volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from unfounded, false or malicious allegations. Note, that allegations against a member of staff who is no longer employed by St Peter & St Paul should be made to the police. Any allegation made against a member of staff, contractor, supply staff, volunteer or Trustee must be reported immediately to the Head. The Head should not speak to the member of staff who is the subject of the allegation at this point. If there is a conflict of interest in reporting this matter to the Head, it should be directly referred to the LADO.



If the allegation is against the Head, then the allegation should be reported to the Chair of the Board of Trustees. The Chair of the Board will refer the allegation to the Local Area Designated Officer. The Head must not be informed of the allegation prior to contact with the Chair and the LADO.

These procedures will be used in respect of cases where it is alleged that a member of staff or volunteer has:

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

St Peter & St Paul School will provide support for the members of staff and provide them with a named contact if they are suspended. Any allegation will be dealt with as quickly as possible in a fair and consistent manner that provides effective protection for the child and at the time supports the person who is the subject of the allegation. Particular care will be exercised where a member of staff has been suspended such that they are kept informed of progress and the length of any suspension is kept to a minimum.

The Head will take the lead and act as 'case manager'. Additional information may be sought such as previous history, whether the child has made similar accusations in the past and the member of staff's current contact with children. The initial discussions may lead to a decision that no further action is necessary, and it should be recorded as such. In this situation the Head should determine what action should follow in respect of the person who made the allegation.

The Head should inform the member of staff about the allegation as soon as possible and provide as much information as possible without compromising any investigation. The Head will consider carefully whether the member of staff should be suspended or whether alternative arrangements can be put in place. Suspension will only be considered if there is no reasonable alternative. Note that in the event of an allegation against the Head, the Head will not be informed of the allegation prior to reporting to the Chair of the Board of Trustees and LADO. A decision to suspend the Head will be taken by the Chair of Board of Trustees.

If further investigation is deemed necessary, then the Head will determine how and by whom this investigation will be undertaken.

Where it is clear that an investigation by the police or children's social care is unnecessary, an internal investigation and hearing will be undertaken. The Designated Safeguarding Lead may be appointed Lead investigator. Following a hearing, involving the member of staff, a union representative and the Head a decision will be reached, ranging from no further action to dismissal or a decision not to use the person if a volunteer.

Parents or carers of a child involved should be told of the allegation as soon as possible if they do not already know, subject to any concerns raised by the police or children's social services. They should be kept informed about progress of the investigation but should also be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002.



The school will report promptly to the Disclosure and Barring Service (DBS) any person whose services are no longer used by the school for regulated activity (effectively anyone employed at the school) and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child. The following list describes the reasons where services are no longer required.

- Dismissal
- Non-renewal of a fixed term contract
- No longer engaging or refusing to engage a supply teacher.
- Terminating the placement of a student teacher or other trainee
- No longer using staff employed by contractors.
- No longer using volunteers.
- Resignation
- Voluntary withdrawal from supply teaching, contract working, teacher training or volunteering.

Where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order is appropriate, then the school has a duty to consider whether a referral should be made to the Teaching Regulation Agency (TRA). This would be likely in the event of unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence. In some circumstances St Peter & St Paul School will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency. Whilst the school is not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

The Board of Trustees and Headteacher will discuss with the agency whether it is appropriate to suspend the supply teacher whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, are under the supervision, direction and control of the Headteacher and governing body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the school during the investigation. When using an agency, school will inform the agency of its process for managing allegations. 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.

Low-level Concerns (Concerns that do not meet the harm threshold)

St Peter & St Paul school encourages everyone affected by its operation to report to the Head, any concern – even if no more than one which causes a sense of unease of 'nagging doubt' – they may have that an adult working in or on behalf of the school may have acted in a way that is inconsistent with expected standards and/or the Staff Code of Conduct.

Where a low-level concern is raised about the Headteacher, it should be reported directly to the Chair of Trustees, Mrs Anne Camm.

Where a low-level concern is raised about the DSL, it should be reported to the Head.

All members of staff are encouraged to self-refer where, for example, they have found themselves in a situation which could be misinterpreted or might appear compromising to others, and on reflection they believe that they have behaved in a way that falls below the expected standards. The DSL will usually share the concern with the Head, and they will address it in a proportionate manner. They will gather as much evidence as they can by speaking where possible with the person who raised the concern, the individual involved and any witnesses. They will consider whether it is indeed a low-level concern or whether it is sufficiently serious to meet the harms threshold.

All low-level concerns will be recorded in writing by the Head. The record will contain details of the concern, the context in which the concern arose, and action taken, together with the rationale for all decisions and actions. The name of the individual sharing the concern will also be noted: if the individual wishes to remain anonymous, that will be respected as far as reasonably possible.

Records of low-level concerns will be regularly reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern is identified, the Head and the DSL will decide on a course of action: this might be an internal disciplinary procedure or referral to the LADO if the harms threshold is met. They will consider if any wider cultural issues in the school enabled the behaviour to occur and if appropriate policies could be revised or extra training given to minimise the risk of recurrence.

The purpose of this Low-level Concerns Policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff. Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Those that relate exclusively safeguarding will not be referred to in a reference unless they meet the threshold for referral to the LADO and are found to be substantiated. Where a low-level concern relates to supply staff or a contractor, their employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally to the Head a record of the conversation will be made by the Head which will be signed, timed, and dated. Responding to low-level concerns Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head, or if designated, the DSL will:

- Speak to the person reporting the concern to gather all the relevant information, gathering as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice from the Bursar / HR Link Trustees may also be taken).

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:



- is consistent with the school's Staff Behaviour and Code of Conduct: no further action will be required.
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behavior via normal day-to-day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g., via the Capability and Disciplinary Procedures.
- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken from the Bursar & HR Link Trustee.

The school must consider if any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence. Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed: when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice taken from the Bursar. In this case the school's Staff Code of Conduct, Safeguarding & Child Protection and Disciplinary Polies will be followed.

When considered with any other low-level concerns that have previously been made, records will be made of:

- all internal conversations including any relevant witnesses.
- all external conversations, e.g., with the LADO the decision and the rationale for it
- any action taken.

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (i.e., self-refer)?

It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct. In these circumstances they should self-refer This will enable a potentially difficult situation to be addressed at an early opportunity if necessary. Where behaviour is consistent with the Staff Code of Conduct, feedback will be given to both parties to explain why the behaviour was consistent with the Staff Code of Conduct.

Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained. References Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

What is the role of the Board of Trustees?

The Head will regularly inform the Board of Trustees about the implementation of the low-level concerns policy including any evidence of its effectiveness, e.g., with relevant data. The safeguarding link Trustee may also review an anonymised sample to ensure that these concerns have been handled appropriately.



28.0 Child on Child Abuse including Sexual Violence and Harassment

All staff working in or on behalf of the school maintain an attitude of ‘it could happen here’ – this is especially important when considering child-on-child abuse. Even if there are no reports it does not mean it is not happening.

If staff have any concerns regarding child-on-child abuse, they should speak to the designated safeguarding lead or their deputy

The school recognises that children may abuse their peers physically, sexually and emotionally. There is a zero-tolerance approach to child-on-child abuse. Abuse is abuse whether perpetrated by an adult or a child, and this will not be tolerated or passed off as ‘banter’, ‘just having a laugh’, ‘boys being boys’ or ‘part of growing up’, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. The school teaches children how to foster healthy relationships and to recognise abusive behaviour through our Jigsaw PHSE programme. Children are encouraged to report abuse, safe in the knowledge that they will always be listened to and taken seriously. Our school approach is informed by the DDSCP Child-on-Child Abuse Strategy and is further set out in our Behaviour Policy, Anti-Bullying Policy and Staff Code of Conduct.

The setting will take child-on-child abuse as seriously as abuse perpetrated by an adult and address it through the same processes as any safeguarding issue. We will respond to all reports and concerns, including those that have happened outside of the school and/or online. In addition, we also recognise that children who abuse others and any other child affected by child-on-child abuse are also likely to have considerable welfare and safeguarding issues themselves.

What is child-on-child abuse?

- [Keeping Children Safe in Education](#) (September 2024) defines child-on-child abuse as most likely to include but not limited to:
 - Bullying (including cyberbullying, prejudice based and discriminatory bullying).
 - Abuse within intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’).
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and /or encourages physical abuse).
 - Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and /or encourages sexual violence).
 - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
 - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
 - Consensual and non-consensual sharing of nudes and semi-nude images and or videos (Sexting).
 - Upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.



- Initiating/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- It can also include causing someone to engage in extremist or radicalising behaviour.
- Child-on-child abuse exists on a continuum and different forms of abuse may overlap.
- It can affect any child/young person of any age and sex and can occur between two children or through a group of children abusing a single child or group of children.
- Sometimes vulnerable children are targeted. For example:
 - Those living with domestic abuse or with intra-familial abuse in their histories.
 - Young people in care.
 - Those who have experienced bereavement through the loss of a parent, sibling, or friend.
 - Black and minority ethnic children are under identified as victims but are over identified as perpetrators.
 - There is recognition that it is more likely that girls will be victims and boys are likely to be perpetrators. However, both girls and boys can experience child-on-child abuse, but they are likely to experience it differently e.g., girls being sexually touched/assaulted or boys being subject to homophobic taunts/initiation/hazing (rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group).
 - Evidence also shows that children with SEND, and LGBTQ+ children are at greater risk.
 - Staff should be aware that gender issues can be prevalent when dealing with this type of abuse i.e., that it is more likely that girls will be victims and boys' perpetrators, and that Child-on-Child abuse should not be tolerated or passed off as banter, part of growing up or "just having a laugh". The threshold for dealing with such abuse is when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.
- It is influenced by the nature of the environments in which children/young people spend their time – home, school, peer group, online and community – and is built upon notions of power and consent. Power imbalances related to gender, social status within a group, intellectual ability, economic wealth, social marginalisation etc, can all be used to exert power over a peer.
- Child-on-child abuse involves someone who abuses a 'vulnerability' or power imbalance to harm another and has the opportunity or is in an environment where this is possible.
- While perpetrators of child-on-child abuse pose a risk to others, they are often victims of abuse themselves.

Preventing child-on-child abuse

There is a whole school approach to preventing child-on-child abuse, this forms part of the whole school approach to safeguarding. The school provides a safe environment and promotes a culture of respectful, caring behaviour. Our approach seeks to minimise the risk of child-on-child abuse by ensuring that learners are prepared for life in modern Britain, through PHSE lessons, assemblies and internet safety lessons. The establishment has a clear set of standards, our Guiding Star values, which are upheld and demonstrated throughout all aspects of school life. The school emphasises the values of Respect (tolerance of differences), Care (treating others as you would like to be treated) and Bravery (speaking out against bullies and abusers). Children can confidently raise concerns knowing they will be taken seriously.

All staff understand the importance of challenging inappropriate behaviours between peers that are abusive in nature. Downplaying certain behaviours will not be tolerated or passed off.



Staff will maintain an attitude of 'it could happen here' and all inappropriate behaviour will be addressed. Moreover, considering the maturity of the child, the staff member will explain why the behaviour is inappropriate.

The setting deals with a wide continuum of children's behaviour on a day-to-day basis and most cases will be dealt with via school-based processes. These are outlined in the following policies:

- Behaviour Policy.
- Anti-Bullying Policy.
- Online Safety Policy.
- Relationships and Sex Education (RSE) Policy.

Systems for children to report abuse.

Even if there are no reports, all staff understand it does not mean it is not happening; it may be the case that it is not being reported. We recognise that children may not find it easy to tell staff about the abuse, that certain children may have additional barriers to telling someone and children can show signs or act in ways they hope adults will notice or react to. In some cases, victims may make indirect reports via a friend or staff may overhear conversations. All staff recognise the indicators and signs of child-on-child abuse and know how to identify it.

See Section 21 for information about the systems in place for children to confidently report concerns and abuse.

**If staff have any concerns regarding child-on-child abuse, they should speak to the
Designated Safeguarding Lead or Deputy**

Action on concerns

Child-on-child abuse may be a one-off serious incident or an accumulation of incidents. Staff may be able to easily identify some behaviour as abusive. However, in some circumstances it may be less clear. In particular, reports of sexual violence and harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. In all cases the initial response to a report is very important. Members of staff will take the concerns seriously and reassure the child that they will be supported and kept safe, regardless of how long it has taken them to come forward. If possible, reports should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases. The victim will not be given the impression they are creating a problem or made to feel ashamed for making a report or their experience minimised. Abuse which has occurred online or outside of the school will be treated just as seriously as that which has occurred within the education environment.

Staff must follow Section 6. Responding to concerns about a child's welfare and discuss the concerns and seek advice from the designated safeguarding lead.

When an allegation is made by a pupil against another pupil, members of staff should consider if the issues raised indicate that the child and/or alleged perpetrator may have low level, emerging needs, complex/serious needs, or child protection concerns and follow the process outlined in Section 6 – Responding to concerns about a child's welfare.

Considerations for cases where child-on-child abuse is a factor include:

- What are the wishes of victims in terms of how they want to proceed?
- What is the nature, extent and context of the behaviour including verbal, physical, sexual (including sharing of nudes/semi-nudes) and/or online abuse? Was there coercion, physical



aggression, bullying, bribery or attempts to ensure secrecy? What was the time, location, duration, and frequency? Is the incident a one off or a sustained pattern of abuse? (Remember there may be other forms of abuse in addition to what has been reported) Were other children and/or adults involved? Has a crime been committed and/or have any harmfully sexual behaviours been displayed?

- What is the child's age, development, capacity to understand and make decisions (including anything that might have had an impact on this e.g., coercion), and family and social circumstances? What is the nature of the relationship between the children involved? Are they in a current or previous intimate personal relationship, do they live in the same household or setting, attend the same school, classes, or transport?
- What are the relative chronological and developmental ages of the children? Does the victim or perpetrator have a disability or learning difficulty? Are there any differentials in power, social standing, or authority?
- Is the behaviour age appropriate or not? Does it involve inappropriate sexual knowledge or motivation?
- Are there any risks to the child victim or alleged perpetrator themselves and others e.g., other children in school, school staff, others in the child's household (particularly siblings or other children related to the household), extended family, peer group or wider social network? Are there any links to child sexual exploitation, child criminal exploitation or gang related activity?

Immediate consideration should be given to how best to support and protect the victim and alleged perpetrator and any other children impacted. Where the report involves rape and assault by penetration, the alleged perpetrator must be removed from any classes they share with the victim. There must also be careful consideration on how best to keep the victim and alleged perpetrator apart on school premises (including any before or after school activities) and on transport to and from the setting.

For all other reports of sexual violence and sexual harassment and forms of child-on-child abuse, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, school premises and transport should be considered immediately.

All decisions will be made in the best interests of the children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator. In all cases, the initial report should be carefully

evaluated on a case-by-case basis with the designated safeguarding lead taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. The designated safeguarding lead will refer to relevant assessment tools and guidance as appropriate such as:

- [Keeping Children Safe in Education](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Searching, screening and confiscation at school](#)
- [Behaviour in schools](#)
- [School suspension and permanent exclusion](#)
- [Stop it Now Sexual Behaviours Traffic Light Tool](#)
- [DDSCP Thresholds Document](#)
- [DDSCP Safeguarding Children Procedures](#), in particular Children who present a risk of harm to others and Online Safety and Internet Abuse procedures.
- [When to call the police – guidance for schools and colleges](#)



Whenever there is an allegation of abuse, including concerns about sexual harassment and violence, made against a child, the designated safeguarding lead and other appropriate staff will draw together separate risk and needs assessments and action plans to support the victim and the alleged perpetrator. These will consider:

- The victim, especially their protection and support.
- Whether there have been other victims.
- The alleged perpetrator/s.
- All the other children (and if appropriate adult students and staff) at the school, especially any actions that are needed to protect them from the perpetrator/s, or from future harm.
- The time and location of the incident and any action required to make the location safer.
- When information can be disclosed to staff and others, including the alleged perpetrator and parents/carers.

Whenever local authority children's social care and/or the police are involved, the school will work in collaboration to ensure the best possible support and protection is provided for both the victim and the alleged perpetrator.

All reports of child-on-child abuse (including sexual harassment and/or sexual violence) will be recorded in the child's safeguarding/child protection file (MyConcern profile). This will include all decision making, risk and needs assessment and plans recorded in writing as outlined in Section 6.

Where appropriate incidents may be managed internally (low level needs), via early help (emerging needs) or through local authority children's social care (complex/serious needs or child protection concerns); reports to the police will be run in parallel with children's social care as outlined in the Derby and Derbyshire multi-agency safeguarding procedures, in particular Children who Present a Risk of Harm to Others and Online Safety and Internet Abuse procedures.

All risk and needs assessment and action plans whether internal or multi-agency will be reviewed and updated on a regular basis. If things do not improve or deteriorate the situation should be reconsidered.

Where the victim or alleged perpetrator transfers to another education setting, the designated safeguarding lead will ensure the new provider will be made aware of any on-going support needs (and will discuss this with the victim and where appropriate their parents, as to the most suitable way of doing this) as well as transferring the safeguarding/child protection file. In the case of the alleged perpetrator, where appropriate, this will also include potential risks to other children and staff.

Any suspicion or allegations that a child has been sexually abused or is likely to sexually abuse another child (or adult) or where there are concerns about any other form of abuse, a referral must be made immediately to local authority children's social care and where appropriate, the police

Concerns about safeguarding practices within the school – Whistleblowing



All staff are encouraged to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. These concerns will be taken seriously by the senior leadership team.

Concerns about safeguarding practice should be raised with the headteacher. All concerns will be taken seriously and investigated thoroughly in conjunction with the Designated Safeguarding Lead. This may lead to changes in policy or procedures. The whistleblower will be informed at the conclusion of the investigation. If the concerns persist, the whistleblower should escalate the concern to the Chair of Trustees (acamm@spsp.org.uk) Please see Whistleblowing Policy for further details.

29.0 Safer Recruitment

1. The school is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance, and in accordance with the school's Recruitment and Selection Policy.
2. The school obtains Disclosure and Barring Service clearance for all staff and complies with guidance concerning the Childcare (Disqualification) Regulations 2018 and the Education Act 2006. The school conducts a number of checks including a prohibition from teaching check and prohibition from management (S.128 direction) check, where applicable, via the Teaching Regulation Agency.
3. Individuals who have lived or worked outside the UK undergo the same checks as all other staff.
4. The school will ensure that appropriate child protection checks and procedures have been applied to any staff employed by another organisation and working with the school's pupils on another site.
5. The school will make a referral to the Disclosure and Barring Service (PO Box 3961, Wootton Bassett, SN4 4HF, Tel: 03000 200 190) as soon as possible if the criteria are met, that is they have caused harm or pose a risk of harm to a child, in cases where:
 - it is decided to dismiss a member of staff (including the Headteacher) or to cease using the services of a Trustee, contractor, volunteer or student at the school because he or she is considered unsuitable to work with children (a settlement/compromise agreement will not be used)
 - a member of staff (including the Headteacher), Trustee, contractor, volunteer, student or any other person at the school tenders his or her resignation, or ceases to provide his or her services, and child protection allegations had been made.
1. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.
2. The Disclosure and Barring Service is responsible for bringing together the services for the checking of criminal records and the barring of individuals deemed unsuitable to work with children or vulnerable adults.



3. Any such incidents will be followed by a review of the safeguarding procedures within the school with a report being presented to the Board of Trustees without delay.
4. The school complies with the Childcare (Disqualification) Regulations 2018 and the Education Act 2006. Staff connected to the School's Early Years and Later Years provisions are under an ongoing duty to inform the school if their circumstances change, which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Recruitment and Selection Policy for further information about this duty. The guidance applies to all staff, supply staff and volunteers working in the school.

30.0 Secure School Premises

1. The school will take all practical steps to ensure that School premises are as secure as circumstances permit.
2. All visitors are required to sign in on arrival at Reception and sign out on departure. All visitors will be given a name badge with the title "Visitor" which must be clearly displayed and worn at all times whilst on school premises. Visitors who are not required to undergo DBS checks must be escorted whilst on school premises by a member of staff or appropriately vetted volunteer. Visitors who have undergone requisite DBS checks are not required to be escorted whilst on school premises.
3. Contractors who are not required to undergo DBS checks will be issued with a visitor's badge and must be escorted at all times whilst on school premises. Contractors who have undergone requisite DBS checks will be issued with contractor's ID and are not required to be escorted whilst on school premises.
4. All staff are issued with identity badges displaying their name and photograph. The badges must be clearly displayed and worn at all times whilst on school premises.

31.0 Safer Use of Technology

1. The school's Online Safety Policy and ICT Acceptable Use Agreement set out comprehensive guidance and advice to pupils, staff and all members of the school community. Pupils are taught online safety as part of a broad and balanced curriculum, which includes lessons on staying safe online as part of the Personal, Social and Health Education syllabus.
2. Children are not permitted to bring in their own mobile phones. If an exception is made, pupil must have consent from the Headteacher and the phone must be handed in to their class teacher at the beginning of the school day and collected at the end of the day.
3. The Staff Code of Conduct and ICT Acceptable Use Agreement include guidance on the use of mobile phones and cameras. Guidance to parents and staff on use of cameras in school is also set out as follows:
 - pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises.



- parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
 - staff may bring mobile phones/personal devices onto the premises but should not take photographs of pupils on their mobile phones/personal devices. Staff should only use equipment provided or recognised by the school when taking photographs of pupils for official school purposes. The school has a separate policy for the use of mobile phones. Mobile phones are only permitted in areas where pupils are prohibited.
4. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:
- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views.
 - contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults.
 - conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
5. The school will do all it reasonably can to limit pupils' exposure to the above risks when using the school's IT systems by having in place appropriate and robust filtering and monitoring system to safeguard pupils from potentially harmful and inappropriate material online without "over blocking" or imposing unreasonable restrictions as to what pupils can be taught through online teaching.

32.0 Training

1. All training will be carried out in accordance with the DDSCP training requirements.
2. The DSL will attend child protection training courses (also appropriate to our EYFS setting) and training on inter-agency working at least biannually year in keeping with Keeping Children Safe in Education, including Annex C
3. The DSL also undertakes Prevent awareness training. The DSPs will undertake advanced safeguarding training.
4. All staff, including temporary staff and volunteers, will be provided with the following documents in their induction training:
 - this policy (which includes our procedure for Children Missing in Education)
 - the Staff Code of Conduct
 - the Whistleblowing procedure
 - the Behaviour Policy
 - the role, identity and contact details of the DSL and DSDs
 - Part One of KCSIE (September 2025)
5. The purpose of this induction training will be to ensure that staff understand the school's safeguarding policies and procedures and that they have an up-to-date knowledge of safeguarding issues. This will include, amongst other content, training to enable staff to identify signs of abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way.



6. All staff, including the Headteacher, Trustees and volunteers, receive a copy of Part One of Keeping Children Safe in Education (Sept 2025). School leaders and staff working directly with children will also be provided with a copy of Annex A and Annex B of Keeping Children Safe in Education during induction training. Staff are required to complete a declaration confirming they have received, read and understood Part 1 and, if applicable, Annex A and Annex B.
7. At least every two years, the DSL will ensure that the Headteachers, all staff members and the Board of Trustees, including the link Trustee, undertakes child protection training appropriate to their roles which will be updated regularly in accordance with the DDSCP requirements. The purpose of this training will be to ensure that staff understand the school's safeguarding policies, and in particular, the Safeguarding and Child Protection Policy, and that they have an up-to-date knowledge of safeguarding issues. This will include, amongst other content, training to enable staff to identify signs of abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way.
8. Whenever such training takes place, in consultation with DDSCP, the school will discuss and take account of any specific local requirements and the context of the school which needs to be taken account of in the training.
9. The school undertakes to make all supply staff, part-time staff and volunteers aware of the training to ensure their attendance. The DSLs run safeguarding and child protection training sessions throughout the academic year to ensure all staff receive the requisite training. Staff also receive safeguarding and child protection updates via email and staff briefings, as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively. Safeguarding training also includes Prevent training and guidance relating to online safety.
10. The Headteacher and Senior Leadership Team will monitor and evaluate with Board of Trustees the effectiveness of the safeguarding training provided to staff. The safeguarding training will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require).

33.0 Monitoring and review

Any serious child protection incidents at the school will be followed by a review of the safeguarding procedures within the school by the DSL and a prompt report to the Headteacher. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

The Safeguarding and Child Protection Policy will be subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require) by the Headteacher and Senior Leadership Team.

The Safeguarding and Child Protection Policy will also be subject to critical review by the Chair of the Board of Trustees, who has received governance safeguarding training, the outcome of which will be reported to the full Board.



The full Board of Trustees will annually review this policy and the implementation of its procedures, including good cooperation with local agencies, and approve the amendments to the policy, which will, in turn, be signed off by the Chair of the Board of Trustees. This annual review will take account of evidence such as staff training in safeguarding matters, referral data, analysis of any issues and themes which have emerged in the school and how these have been handled, initiatives to educate pupils about safeguarding, and details of any contribution the school has made to local discussions and multiagency working on safeguarding matters. The annual review will be conducted in conjunction with the Headteacher and Senior Leadership Team (including the DSL).

The date of the next review is August 2026.



Appendix 1: Reporting Concerns about a Child

Any member of the staff, including volunteers, must record any concerns about a child or young person. This form must be completed as soon as possible after the discovery of the concern. Please hand the form directly to DSL (Scott Nixon), Deputy DSD (Alison Austin) or Headteacher (Thomas Newton). If these are unavailable, place the form in a sealed envelope and mark as safeguarding concern. Hand this to the receptionist who will locate the relevant member of staff.

If the concern is urgent, make this clear so that the DSL or Deputy responds immediately.

Child's full name:		Date of birth:	
		Class:	
Concern identified by:		Role:	
Date of concern:		Time of concern:	
Witness/es:		Place of incident:	
Name of alleged person (s) responsible for the harm/potential harm:			
Not known		Volunteer	
Learner in this school/college		Member of staff	
Learner in another school/college, (please specify)		Governor/Trustee	
Family member		Other (please specify)	
Concern/Incident/Disclosure			
Name of Person Concerns Reported to:			Date



Has any action already been taken in relation to this concern?

For example, child taken out of class, first aid

Action to be Taken / Recommendations from Designated Safeguarding Lead

Name of Person Completing Form	Signature	Date & Time

Concern/Incident/Disclosure: Why are you concerned about this child? What have you observed and when? What have you been told and when?

Please provide a description of any incident/s or anything you see or have been told by a child, or another person. Record any visible injuries or ask the child/young person to point to where else it is sore/hurts. Do not remove or lift clothing for the purpose of the examination unless the injury site is freely available because of treatment or take photos of injuries. If photos of injuries are required for evidence purposes, then this should be done by the police.

Remember to make clear what is fact and what is hearsay/opinion. Note the language and terminology used by the child, or adult, and be clear about who has said what.

Continue on a separate sheet if necessary.



Appendix 2: Checklist – Reporting process if you have a safeguarding concern.

If you suspect a child is at risk of harm immediately, alert the Designated Safeguarding Lead (DSL) or, in his absence, a Deputy (DSD):

- Mr. Scott Nixon (DSL) on 01246 278522 Ext. 202
- Mrs Alison Austin (DDSL) on 01246 278522 Ext: 202
- Mr. Thomas Newton (Headteacher) on 01246 278522 Ext. 206 or 07375538149 out of school hours

If a child makes a disclosure:

- Listen – do not interrupt the child, use active listening techniques, do not appear shocked or upset.
- Ask open questions (e.g., Can you tell me more about...? How did it happen? Who was there? Tell me about your relationship with...? What happened?)
- Never ask leading questions (e.g., Did she hit you? Did it happen more than once?)
- Believe – do not make assumptions about what you are being told.
- Support – reassure the child that they have done the right thing and they are not in trouble.



Report

Write down the contents of your conversation immediately, ideally on a Safeguarding Concern Form. Try to recount the disclosure in the child's words. Take the form straight to the DSL or, in his absence, a DSD. Note that referrals to statutory agencies do not require parental consent.

- Mr. Scott Nixon (DSL) on 01246 278522 Ext. 202
- Mrs. Alison Austin (DSD) on 01246 278522 Ext: 202
- Mr. Thomas Newton (Headteacher) on 01246 278522 Ext. 206 or 07375538149 out of school hours



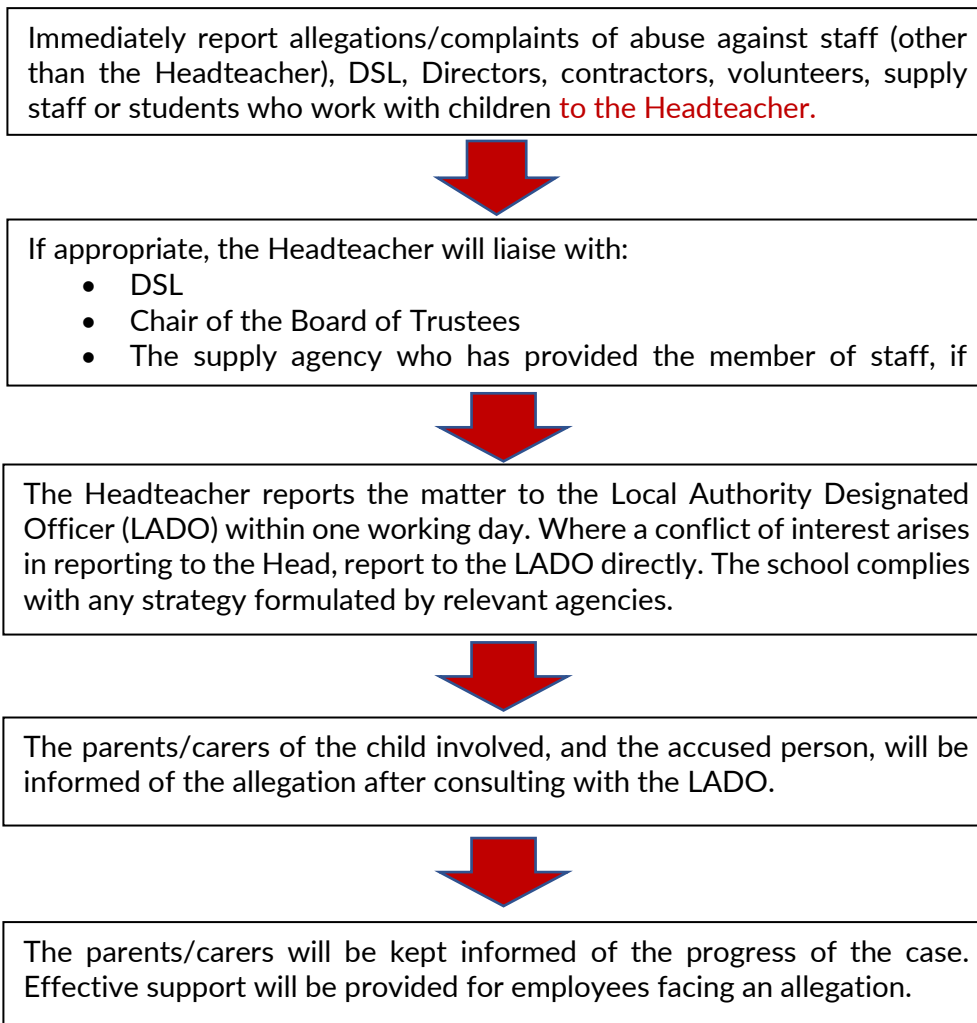
Report

If you cannot contact a DSL or DSD, alert DDSCP Starting Point on 01629 535353



Appendix 3: Checklist – Reporting process for allegations of abuse against members of staff, Trustees, contractors, volunteers, supply staff or students who work with children.

Where ‘lower level’ concerns and allegations (low-level concerns) do not meet the harms test, they should be addressed separately. Please refer to our Low-Level Concerns Policy for guidance.





Appendix 4: Checklist – Reporting process for allegations of abuse against the Headteacher.

Immediately report allegations of abuse against the Headteacher, without notifying the Headteacher, to the Chair of the Board of Trustees. acamm@spsp.org.uk



The Chair of the Board of Trustees reports the matter to the Local Authority Designated Officer (LADO) within one working day, without notifying the Headteacher. The school complies with any strategy formulated by relevant agencies.



If NO - Give a brief but valid reason/explanation for not:

If YES - Please provide details below of STAFF MEMBERS RESPONSE TO CONCERN

Action Taken:

Was advice/guidance sought from the LADO and or Human Resources? Yes No

Signed:

Dated:

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the school's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with school's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.



Appendix 6 - Useful Definitions

CAMHS

Child and adolescent mental health services, which promote the mental health and psychological well-being of children and young people and provide multi-disciplinary mental health services to all children and young people with mental health problems and disorders to ensure effective assessment, treatment and support, for them and their families.

Child

A person under the age of 18 (s105 Children Act 1989)

Channel

The multi-agency process designed to safeguard vulnerable people from being drawn into extremist behaviour. It works in a similar way to existing safeguarding partnerships.

Child abuse

See Keeping Children Safe in Education paragraphs 19-48

Child Protection

This is part of safeguarding and promoting welfare. It is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse, neglect or exploitation. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

Children in need

under section 17 of the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or this will be significantly impaired without the provision of services, plus those who are disabled. The key factors in determining whether a child is in need are what will happen to the child's health or development without services being provided; and the likely effect the services will have on the child's standard of health and development.

Designated Safeguarding Lead

This is the individual (or individuals) identified within the school with lead responsibility for child protection and safeguarding matters.

Extremism

Vocal or active opposition to fundamental British values ... (including) calls for the death of members of our armed forces, whether in this country or overseas.

Local Safeguarding Partners

The three local safeguarding partners (the local authority, a clinical commissioning group for an area within the local authority, and the chief officer of police for a police area in the local authority area) make arrangements to work together with the appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. They have a shared and equal duty to work together to safeguard and promote the welfare of children. They should make arrangements to allow schools to be fully engaged, involved and included in this process. Detailed guidance on these arrangements can be found in Working Together to Safeguard Children.



Prevent

The Prevent duty is the duty under the Counter-Terrorism and Security Act 2015 on (inter alia) schools, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

Radicalisation

The process by which a person comes to support terrorism and forms of extremism.

Safeguarding

This is broader than child protection and includes the process of protecting children from maltreatment; preventing the impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Significant harm

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 states "Where the question of whether harm suffered by a child is significant turns on the child's health and development, his health or development shall be compared with that which could reasonably be expected of a similar child". There are no absolute criteria, but factors will be the severity of the ill treatment, the degree and extent of physical harm, the duration and frequency of abuse, neglect or exploitation, the extent of premeditation, and the presence or degree of threat, coercion, sadism, and bizarre or unusual elements.

Social Services

The work of local authorities exercising their social services functions with regard to children. This may also be referred to as Children's Social Care or local authority children's social care, or Children's Services (within the local Social Services Department). The LADO will be part of this.

Terrorism

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 government or to intimidate the public and is made for the purpose of advancing political, religious or ideological cause.

Well-being

For children, well-being is the term used in the Children Act 2004 relating to the five Every Child Matters outcomes, i.e., being healthy; staying safe; enjoying and achieving; making a positive contribution; and achieving economic well-being.