



# **SAFEGUARDING CHILDREN & CHILD PROTECTION POLICY 2024**

*Updated: 27.01.25*

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# 1 Key Contacts – Internal and External:

*Internal (Repton School and Repton Prep)*

Repton Prep School	
DSL, Repton Prep – Mr Stuart Elks	<a href="mailto:SElks@repton.org.uk">SElks@repton.org.uk</a> / 01283 707137
Deputy DSL, Repton Prep – Ms Kellee Cavill	<a href="mailto:KCavill@repton.org.uk">KCavill@repton.org.uk</a> / 01283 707118
Deputy DSL (Prevent) – Mr Ian Clarkson	<a href="mailto:IClarkson@repton.org.uk">IClarkson@repton.org.uk</a> / 01283 707100
Deputy DSL (EYFS) – Mrs Alice Chapman	<a href="mailto:ACHapman@repton.org.uk">ACHapman@repton.org.uk</a> / 01283 707100
Headteacher, Repton Prep – Mrs Victoria Harding	<a href="mailto:prephead@repton.org.uk">prephead@repton.org.uk</a> / 01283 707100
Repton School	
DSL, Repton School – Mrs Sally Lees	<a href="mailto:SLees@repton.org.uk">SLees@repton.org.uk</a> / 01283 559261
Director of Safeguarding Compliance and Deputy DSL– Mr Neil Lowther	<a href="mailto:NLowther@repton.org.uk">NLowther@repton.org.uk</a> / 01283 559391
Headmaster, Repton School – Mr Mark Semmence	<a href="mailto:headmaster@repton.org.uk">headmaster@repton.org.uk</a> / 01283 559221
Governors	
Chairman of the Governors, Mr Mark Shires	<i>contact without divulging any details is available via Rachel Mair, Clerk to the Governors, calling 01283 559272 or using clerk@repton.org.uk</i>
Liaison Governor for Child Protection, Ms Sally Wan (nominated safeguarding governor)	<i>contact without divulging any details is available via Rachel Mair, the Clerk to</i>

	<i>the Governors, calling 01283 559272 or using <a href="mailto:clerk@repton.org.uk">clerk@repton.org.uk</a></i>
<b>Independent Listeners</b>	
Dr Stephen Longden Mrs Melanie Owen	07855 049461 07751 108519

*External*

<b>Derbyshire Childrens Services:</b>	
Derby & Derbyshire Childrens Safeguarding Partnership (DDSCP) – Starting Point (for referrals)	01629 533190 / Out of hours: 01629 532600 <a href="https://www.ddscp.org.uk/">https://www.ddscp.org.uk/</a> <a href="mailto:starting.point@derbyshire.gov.uk">starting.point@derbyshire.gov.uk</a>
Derby & Derbyshire Childrens Safeguarding Partnership (DDSCP) – Call Derbyshire <b>184 Kedleston Road, Derby, DE22 1GT</b> <b>Tel: 01332 642351</b>	01629 533190 / <a href="https://www.ddscp.org.uk/">https://www.ddscp.org.uk/</a> <b>Email: <a href="mailto:ddscp@derby.gov.uk">ddscp@derby.gov.uk</a></b>
Local Authority Designated Officer (LADO) – Mr Miles Dent – for allegations against staff	01629 531940 / <a href="mailto:professional.allegations@derbyshire.gov.uk">professional.allegations@derbyshire.gov.uk</a> <a href="mailto:miles.dent@derbyshire.gov.uk">miles.dent@derbyshire.gov.uk</a>
<b>The Police:</b>	
Police (non emergencies) / Police emergencies	101 / 999
CEOP (Child Exploitation and Online Protection)	<a href="https://www.ceop.police.uk/Safety-Centre/">https://www.ceop.police.uk/Safety-Centre/</a> <a href="https://www.ceop.police.uk/Safety-Centre/">General enquiries to the National Crime Agency 0370 4967622</a>
<b>Extremism:</b>	
PREVENT Derbyshire County Council	<a href="https://www.derbyshire.police.uk/advice/advice-and-information/t/prevent/prevent/">https://www.derbyshire.police.uk/advice/advice-and-information/t/prevent/prevent/</a> <a href="mailto:Seamus.carroll@derbyshire.gov.uk">Seamus.carroll@derbyshire.gov.uk</a> / 01629 538494 / 07771 980107
PREVENT Regional Coordinator East Midlands providing advice for schools and childminders – Mr Sam Slack	<a href="mailto:sam.slack@education.gov.uk">sam.slack@education.gov.uk</a>

Derbyshire Police PREVENT Team	0300 1228694
Anti-terrorism helpline	0800 789321
<b>Other:</b>	
NSPCC Inform	0808 800 5000 / <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> / <a href="https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/">https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/</a>
NSPCC Whistleblowing Advice Line	0800 0280285 / <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Kidscape (Anti-bullying helpline for parents)	0845 1205204

## 2 Statement of Intent/Aims and Objectives of this policy:

- This policy relates to Repton Prep School.
- The safety and welfare of our pupils is our highest priority.
- All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.
- Our aim is to know **everyone** as an individual and to provide a secure and caring environment so that every pupil can learn in safety.
- No child or group of children will be treated any less favourably than others in being able to access services that meet their particular needs.
- At Repton Prep School, in line with KCSiE 2024 and WTSC 2023, a child centred approach is fundamental to safeguarding and promoting the welfare of every child.
- A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.
- In all matters relating to Child Protection, Repton Prep School will follow the procedures laid down by the Derby & Derbyshire Safeguarding Childrens Partnership (DDSCP), together with DfE guidance contained in Working Together to Safeguard Children (WTSC, December 2023) and Keeping Children Safe in Education (KCSiE, 2024)
- This policy is applicable to the whole school community; however, we appreciate that pupils, in the context of a residential setting, may be particularly vulnerable and that there may be enhanced potential for abuse, neglect and exploitation. This is emphasised in all our safeguarding training and staff must be sensitive to the needs of boarders in particular.
- All members of staff have a duty to safeguard our pupils' welfare and provide a safe environment in which children can learn and must therefore familiarise and comply at all times with this policy.
- All School staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.
- Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.
- Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** – teaching and non-teaching staff - who comes into contact with children and their families and carers has a role to play in safeguarding children in identifying concerns, sharing information and taking prompt action so that the right help is provided at the right time. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred and aim to protect the child using national, local and school, child protection procedures;

- This means that all professionals who come into contact with children should consider, at all times, what is in the **best interests** of the child, but making it clear that confidentiality can never be promised.

### 3 Transparency

Copies of this policy should be read together with other relevant policies including (all supporting policies can be found within Appendix A):

- Staff Code of Conduct (including Whistleblowing Policy)
- Behaviour Management Policy
- PSHE (Including RSE)
- PSHE British Values Policy
- RPS Supervision and Missing Pupil Policy
- Visitors and Security Policy
- Taking, storing and using images of pupil's policy

These policies are located on the Repton Prep School SharePoint site or from the main school office.

We hope that parents and guardians will always feel able to take up any issues or worries that they may have with either Repton Prep or Repton School.

Open communications are essential and allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy.

### 4 Guidance and publications to be used in conjunction with this policy

#### Keeping children safe in Education (2024)

[KCSiE 2024](#)

#### Working together to safeguard children (2018)

[Working Together to Safeguarding Children 2023](#)

#### Relationships and sex education (RSE) and health education (2020)

[Relationships Education, Relationships and Sex Education and Health Education guidance \(publishing.service.gov.uk\)](#)

- the local authority
- a clinical commissioning group for an area, any part of which falls within the local authority
- the chief officer of police for a police area, any part of which falls within the local authority area) to make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs

#### What to do if you are Worried a Child is Being Abused – Advice for practitioners (2015)



[Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/child-abuse-concerns-guide-for-practitioners)

## **Sexual violence and sexual harassment between children in schools and colleges (2021)**

[Sexual violence and sexual harassment between children in schools and colleges  
\(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges)

The following guidance will be used as a point of reference: [when-to-call-the-police--guidance-for-schools-and-colleges.pdf \(npcc.police.uk\)](https://www.npcc.police.uk/media/1281/when-to-call-the-police-guidance-for-schools-and-colleges.pdf)

Repton Prep School referrals will remain under DDSCP (Derby & Derbyshire Safeguarding Children Partnership) until advised otherwise.

This guidance applies...

- in its entirety, to all schools.
- to all children up to the age of 18 years whether living with their families, in state care, or living independently.

WTSC should be complied with, unless exceptional circumstances arise.

Furthermore, we will follow the procedures set out by the DDSCP (formerly DSCB - Derbyshire Safeguarding Children's Board):

[Welcome to the Online Procedures for the Derby and Derbyshire Safeguarding Children Partnership \(proceduresonline.com\)](https://proceduresonline.com/derbyshire-safeguarding-children-partnership)

**Every complaint or suspicion of abuse from within or outside Repton Prep School will be taken seriously and action will be taken in accordance with this policy.**

## 5 Definition of Safeguarding:

Safeguarding and promoting the welfare of children is defined in KCSiE 2024 as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Children includes **everyone** under the age of 18.

### What children want from a safeguarding system:

*Children are clear about what they want from an effective safeguarding system. These asks from children should guide the behaviour of practitioners.*

vigilance: to have adults notice when things are troubling them
understanding and action: to understand what is happening; to be heard and understood; and to have that understanding acted upon
stability: to be able to develop an ongoing stable relationship of trust with those helping them
respect: to be treated with the expectation that they are competent rather than not
information and engagement: to be informed about and involved in procedures, decisions, concerns and plans
explanation: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
support: to be provided with support in their own right as well as a member of their family
advocacy: to be provided with advocacy to assist them in putting forward their views (special provision should be put in place to support children with specific difficulties. e.g., communication unaccompanied children, refugees, victims of modern slavery and /or trafficking)
protection: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee

## 6 Designated safeguarding leads and role/responsibilities:

### Repton Prep School

#### **All Staff (including governors, supply staff, contractors and volunteers)**

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

- contribute to providing a safe environment in which children can learn;
- consider at all times the best interests of the student and take action to enable all students to have the best outcomes;
- attend appropriate safeguarding and child protection training (3 yearly, level 1 refresher from an external provider), annually as directed by the DSL, and as and when additional updates are required;
- be aware of indicators of the different forms of abuse, neglect and exploitation and of emergent mental health problems;
- assist children in need and to protect children from abuse, neglect, exploitation, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures, understand and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral.

### DSL/DDSL

The Deputy Head Pastoral & Boarding, Mr Stuart Elks is the DSL. He has been fully trained for the demands of this role in Child Protection and inter-agency working, and is a member of the SMT. The Deputy Head Pre-Prep – Ms Kellee Cavill - is the DSL's deputy and will lead on child protection issues in his absence. She is a member of the SMT. The deputy DSL has received the same appropriate and relevant training as the DSL. The Head, Mrs Vicky Harding has also received appropriate and relevant DSL training.

Their contact details are:

- Stuart Elks – [SElks@repton.org.uk](mailto:SElks@repton.org.uk)
- Kellee Cavill – [KCavill@repton.org.uk](mailto:KCavill@repton.org.uk)

In addition, Repton Prep has two further Deputy DSLs

- Ian Clarkson – [Iclarkson@repton.org.uk](mailto:Iclarkson@repton.org.uk) (with responsibility for Prevent)
- Alice Chapman – [AChapman@repton.org.uk](mailto:AChapman@repton.org.uk) (with responsibility for EYFS)

The DSL and deputy DSL staff at Repton Prep School regularly attend courses with child support agencies to ensure that they remain conversant with best practice, including DSL Training, Annual

Safeguarding Training and the DDSCP *Autumn Forums*. Their training meets the requirements of KCSiE 2024 and is refreshed at least every two years.

Whilst the activities of the designated safeguarding leads can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead. This responsibility should not be delegated. The DSL and their deputies are most likely to have a complete safeguarding picture and will be the most appropriate individuals to advise on any safeguarding concerns.

**The DSL's at both school sites maintain close links with DDSCP (Derby & Derbyshire's Safeguarding Children Partnership).**

### ***Emergency Procedures***

Adequate coverage is always provided even during emergency situations such as a pandemic. The DSL Stuart Elks and DDSL Kellee Cavill are resident on site and provide cover for all day pupils and boarding pupils outside of the normal school day. In extreme circumstances the role of the DSL may be covered by appropriate staff from Repton School. In the case of being unable to contact a DSL via School contact details/a concern needs to be raised out of School hours, Mr Stuart Elks can be contacted on 07850 956876.

**The broad areas of responsibility for the DSL are:**

<b>Managing Referrals</b>	<b>Training linked to the DSL role</b>	<b>Raising Awareness</b>	<b>Working with others</b>	<b>Training &amp; Induction Training (other staff)</b>	<b>Overseeing Online Safety</b>
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#### **Managing referrals:**

- The Headteacher / DSL will refer all cases of suspected abuse to Derbyshire Children's Social Care and:
  - The Local Authority Designated Officer (LADO) for child protection concerns in all cases which concern allegations against a member of staff
  - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
  - Police (cases where a crime may have been committed).
- Liaise with the Headteacher to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- 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
- The DSL will consider whether it is appropriate to share any information with the new school or college in advance of a pupil leaving, in addition to the child protection file to allow the new school or college to continue supporting a victim of abuse and have the appropriate support in place for the pupil's arrival.

- The DSL will also promote the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales” in addition to LAC.
- DSL should be aware of any Care leaver, details of their LA personal advisor and liaise with them as necessary.
- The DSL can discharge the role with sufficient independence, particularly if an allegation were to be made against a family member The DSL will contact the LADO on any matter that the DSL considers cannot be dealt with properly internally.

#### **Training linked to the DSL role:**

- The DSL and Deputy DSLs will undertake appropriate training at least every two years in order to:
- Understand the assessment process for providing and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the School’s Child Protection Policy and procedures, especially new and part time staff
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of all concerns and referrals, discussions and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children’s care or the Prevent programme, etc.
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among **all staff**, in any measures the School may put in place to protect them
- As an integral part of any trip or tour of a longer duration, or one which involves travelling abroad, a focus on safeguarding is an essential part of planning and risk assessment. This is especially relevant if it involves both male and female pupils. The School will seek to ensure that a member of the staff accompanying such a trip is DSL-trained and that all staff members of the tour party receive enhanced safeguarding training prior to departure.

#### **Raising Awareness:**

- The DSL should ensure the school and local safeguarding policies are known and used appropriately

- Ensure this Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body accordingly
- Ensure the Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this
- Link with the DDSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the School, 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 and a confirmation of receipt is obtained.

### **Work with others:**

The DSL is expected to:

- act as a point of contact with the key safeguarding partners and understand their role within the local safeguarding arrangements with DDSCP and other safeguarding related agencies
- liaise with the Headteacher or principal to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and the Head of Learning Enhancement) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- liaise with other schools to secure (separate to the main pupil file) child protection/safeguarding files for pupils joining Repton Prep School and to ensure secure transit and confirmation of receipt. (e.g Head of Learning Enhancement). Additionally, to provide the child protection file to other schools when a pupil leaves Repton Prep School. This information should be transferred/received as soon as possible and within 5 days for an in-year transfer or at the start of a new term. Any new information should be shared with key staff.

### **Introduction & Training for other staff:**

- Every new member of staff, including part-timers, temporary, visiting and contract staff working in the School, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying, other sensitive issues including specific safeguarding issues, and on the procedures for recording and referring any concerns to the DSL or the Headteacher.

- On induction, staff are provided with training on the Staff Behaviour policy, the safeguarding response to children who go missing from education, and the identity of the DSL and the deputy DSL.
- Staff are also trained in online safety in conjunction with the Repton Prep School Code of Conduct. Child Protection training is also given to new volunteers.
- Staff are provided with or have access to a copy of:
  - The Safeguarding Children and Child Protection policy (including Children Missing from Education, whistleblowing and the role of the DSL and Deputies)
  - The Staff Code of Conduct
  - Part 1 and Annex A & B of KCSiE 2024
- Staff receive an explanation of
  - The Safeguarding Children and Child Protection policy
  - The Staff Code of Conduct and Staff Behaviour policy
  - The pupil behavioural policy
  - The response to children missing in education
  - The role of the DSL and the Deputies
  - The School's approach to online safety
- Whole school training in Child Protection is provided for **all staff** / volunteers / employees of the school including the Headteacher.
- **Everyone** attends regular refresher training annually in line with advice from the DDSCP.
- Training in Child Protection is an important part of the induction process covering the content of this Child Protection Policy, the staff Code of Conduct, Whistleblowing policy and Part 1 of KCSiE 2024 including Annex A&B and the identity of the DSL. It further places emphasis on safeguarding being a child centred approach and that it is '**everyone's** responsibility, all the time' to safeguard our pupils from abuse.
- Training in Child Protection is an important part of the induction process. All new staff sign to confirm that they have read and understood Part 1 of KCSiE 2024 including Annex A & B.
- Regular email briefings and training promote staff awareness of other important areas and areas highlighted within Annex B of KCSiE 2024, including: up-skirting, child criminal exploitation, County Lines, domestic abuse, homelessness, children missing from education (CME), child sexual exploitation (CSE), honour based abuse (incl. female genital mutilation, forced marriage), preventing radicalisation & PREVENT duty/Channel, child on child abuse (including, sexting, sexual violence and sexual harassment), sexual violence & sexual harassment.
- Staff are made aware of the signs, symptoms and indicators of such practices and are required to act immediately if such a practice is suspected.
- **All staff** are required to confirm that they have read and understood Part 1 of the KCSiE 2024, including Annex A and B and the Safeguarding Children and Child

Protection Policy. Existing staff are updated appropriately (e.g. via email or staff meetings) as required but at least annually. This is to assist staff in their understanding and to help them discharge their role and responsibilities as set out in part one of KCSiE 2024. This is to help **all staff** to have a clear understanding regarding abuse, neglect and exploitation in all forms; including how to identify, respond and report. This includes knowledge of the process for allegations against professionals. **All Staff, including Governors and Volunteers** should feel confident that they can report all matters of Safeguarding in School where the information will be dealt with swiftly and securely, always following the correct procedures with the safety and wellbeing of the children in mind.

- The Head, Senior Leaders and all Governors receive a copy of KCSiE 2024 and confirm they have read the whole document.
- With regards to children and the Court system, KCSiE 2024 now directs schools to two guides that support children in the court system, one for [5 to 11 year olds](#) (HM Courts and Tribunals Service, 2017a) and the other for [12 to 17 year olds](#) (HM Courts and Tribunals Service, 2017b).

#### **The DSL will also:**

- Take overall responsibility for online safety, noting that other key staff, including the Data Manager and the Director of IT, will provide invaluable input to online Safety at Repton Prep School. Online Safety, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Organise training on Child Protection within the School.
- Keep appropriate records. KCSiE 2024 highlights that, as well as keeping records of concerns, discussions and decisions; the Designated Safeguarding Lead will keep record of the rationale for any decisions made.
- Advise and support staff.
- Train and cascade information to assist staff including governors and volunteers to keep up to date in safeguarding.
- Monitor and evaluate the effectiveness and the implementation of the School's Child Protection & Safeguarding Policy
- Report at least once a year to the Governors on Child Protection matters.
- Challenge:
  - **any** inaction by senior leaders
  - situations which do not improve
  - **any** failure to share full relevant information with external agencies

Records on Child Protection are kept securely on the school management system and where required, kept locked in the Senior DH's office and are separated from routine pupil records. Access is restricted to the DSL, Deputy DSLs and the Headteacher.



## Overseeing Online Safety:

The DSL will work with the Head of ICT, Compliance Manager and external ICT providers to oversee Online Safety at the school. The school filtering system alerts the DSL and DDSL of any flagged searches by staff and pupils.

## 7 The Role of Governors

**Ms Sally Wan** is the Liaison Governor for Child Protection issues for both Repton School and Repton Prep. The Liaison Safeguarding Governor meets with the Head, Deputy Head Pastoral & Boarding (DSL) & Deputy Head Pre-Prep (DDSL) regularly. During these meetings, a picture of the current pastoral landscape is given. Whilst no names or specific cases will be discussed, trends and patterns on iSAMS will be presented and any significant issues highlighted. A termly summary of pastoral and safeguarding incidents, written by the Deputy Head Pastoral & Boarding is communicated. Serious incidents relating to behaviour, bullying or safeguarding will be notified to the Nominated Safeguarding Governor and the Chair of Governors as they occur. Such incidents will include:

- Events or actions likely to result in a suspension of a pupil due to a disciplinary offence (to include bullying and child-on-child abuse)
- Events or actions likely to result in the expulsion or withdrawal of a pupil due to a disciplinary offence (to include bullying and child-on-child abuse)
- A pupil death or serious illness
- A pupil referral to the Local Authority
- A report to the LADO about a member of staff

Governing bodies and proprietors have a strategic leadership responsibility for their school's or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

Headteachers and principals should ensure that the policies and procedures, adopted by their governing bodies and proprietors (particularly those concerning referrals of cases of suspected abuse, neglect and exploitation), are understood, and followed by all staff.

Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Governing bodies - and proprietors, and their senior leadership teams, especially their designated safeguarding leads - should make themselves aware of and follow multi-agency local arrangements.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

The Governing Body is responsible for:

reviewing the procedures for and the efficiency with which the Child Protection duties have been discharged;
ensuring that <b>any</b> deficiencies or weaknesses in Child Protection arrangements are remedied without delay;
approving amendments to Child Protection arrangements in the light of changing regulations or recommended best practice;
appointing a Designated Safeguarding Lead (DSL) who is a member of the Senior Management Team (SMT);
appointing a designated teacher to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training.
carefully considering how they and the School supports pupils with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race – and disproportionate vulnerabilities.
ensure that children are taught about how to keep themselves and others safe, including online. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

The Governors carry out an annual review of the School's Child Protection Policy and procedures, looking specifically at content and compliance, procedurally and in policy framework, including but not confined to:

- procedures to minimise the risk of child-on-child abuse;
- how allegations of child-on-child abuse will be recorded, investigated and dealt with
- clear processes as to how victims (alleged), perpetrators and any other child affected by child-on-child abuse will be supported;
- a clear statement that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”;

- recognition of the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously; and the different forms child-on-child abuse can take, such as sexual violence and sexual harassment.
- how the school responds to reports of sexual violence and sexual harassment; cross referencing the Pupil Behaviour Policy
- The department of Education searching screening and confiscation advice for schools.
- The UK Council for Child Internet Safety (UKCCIS) Education Group - advice for schools and colleges on responding to sexting incidents; and initiation/hazing type violence and rituals.
- considering Child Protection at every Governing Body meeting as part of the Headteacher's Report.
- ensuring that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, including:
  - the importance of information sharing between professionals and ensure that the school contributes to inter-agency working in line with statutory guidance, working with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.
  - An awareness that the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
  - KCSIE 2024 recommends all education professionals read the [DfE Data Protection guidance for schools \(DfE, 2024b\)](#). This guidance is aimed at school staff, governors and trustees and sets out how to: comply with data protection law; develop data policies; understand what staff and pupil data to keep; and prevent personal data breaches.
  - Safeguarding arrangements that take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the DSCB.
  - GDPR cannot be allowed to stand in the way of safeguarding children. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Schools must consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place.
- Day-to-day responsibility for the management of Child Protection is delegated to the Headteacher, DSL and deputy DSLs at both Repton School and Repton Prep.

## 8 Forms of abuse and other safeguarding concerns:

**All staff** should be aware of indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

**Abuse:** a form of maltreatment of a child. Somebody may abuse, neglect or exploit 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. 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 and exploitation can take place wholly online, or technology may be used to facilitate offline abuse and exploitation. Children may be abused or exploited by an adult or adults or by another child or children.

**Different categories of child abuse are defined in KCSiE 2024:**

Physical Abuse	Emotional Abuse	Sexual Abuse	Neglect
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*For a detailed explanation of these forms of abuse see Appendix 3*

Other specific safeguarding issues include:

- Mental Health related (pupil / family / friends)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Female Genital Mutilation (FGM)
- Faith abuse
- 'Honour' based abuse
- Forced Marriage
- Radicalisation
- Trafficking
- Fabricated or induced illness
- Gangs and youth violence
- Gambling
- Gender based violence / Violence against women & girls (VAWG)
- Hate
- Online abuse / Other online risks / Sexting
- Teenage relationship abuse
- Child on child abuse (bullying; cyber-bullying; sexual violence and sexual harassment including LGBTQ+Q+ related); physical abuse; youth produced imagery (sexting); upskirting; initiation & rituals; verbal abuse including "banter")
- Children Missing in Education (CME)
- Private Fostering
- Domestic Abuse, including where they see, hear or experience its effects

- County Lines (See Appendix 10) / Serious violence linked to County Lines

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

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

## 9 Hierarchy of Intervention:

Derby City and Derbyshire Partnership (DDSCP) produces threshold guidance that all agencies, professionals and volunteers can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds – *Universal, Emerging Needs, Intensive, Specialist* - for intervention in relation to a continuum of need, noting that children's needs can change over time during their childhood years.

**DDSCP Threshold document:** [Derby City and Derbyshire Threshold Document - December 2019](#)

### Early Help:

Early help – means to provide support as soon as a problem emerges at any point in a child's life.

All staff should be alert to the need for early help for a child who:

- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody or is affected by parental offending.

Providing early help is more effective in promoting the welfare of children than reacting later. This may need the support from a wide range of local organisations and agencies.

The DSL leads when early help is appropriate (refer to WTSC 2018).

Staff should be aware of recognising the potential need for early help; in particular in the following groups, but not exclusive to when:

The child is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
The child is at risk of modern slavery, trafficking or exploitation.
The child is showing early signs of abuse and/or neglect.
The child is at risk of being radicalised or exploited.
The child is a privately fostered child.
The child is in family circumstances presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
The child is misusing drugs or alcohol themselves.
<i>Other groups, see WTSC 2023</i>

**If a child may be a potential victim of modern slavery or trafficking a referral must be made to the National Referral Mechanism.**

## 10 Promotion of Wellbeing

Wellbeing is defined as that state of ‘being comfortable, healthy or happy’ (OED). But it is more than that. The primary consideration is how the individual pupil feels about themselves but, in addition, the School regards a pupil’s wellbeing as involving a combination of the following factors: satisfaction with life, a sense of purpose, social interaction, the degree of control over one’s life, physical activity, a sense of optimism, a sense of opportunity and achievement and a sense of being listened to and valued for themselves. When referring to ‘health’, Repton Prep School understands this to mean not just physical but mental and emotional health.

Repton Prep School recognises that pupil wellbeing is inherently linked to safeguarding and we are committed to promoting positive pupil and staff wellbeing in all that we do. The wellbeing of each pupil is paramount and is the foundation of personal, social and academic development. In general terms, the School’s approach is threefold:

1. To develop a whole school culture of wellbeing.
2. To give appropriate and effective support to those pupils who need it.
3. To prepare our pupils to lead healthy lives in the future.

Every pupil should feel safe and at ease within the School. This is particularly important for boarders for whom the boarding house should be a ‘home from home’. A sense of safety is created not just by maintaining the security of the site and its buildings but also by establishing a clear, fair and consistent code of behaviour (The Repton Prep Code) and a set of school rules by which all pupils are expected to abide.

It is important to note that if the health or safety of an individual is thought to be at risk, the school will follow procedures set down in the Child Protection & Safeguarding Policy and the Serious Incidents Protocol.

A sense of identity is at the heart of self-worth. Every pupil should feel accepted for who they are regardless of race, religion, culture, gender, sexuality, special educational needs, disability, or family situation. **Any** undermining antagonism or ridicule on these grounds has no place in Repton Prep School and will be dealt with immediately.

The School aims to promote and develop resilience in its pupils, to enable them to cope with problems, pressures and change, not just during their time at Repton Prep School but as a preparation for the future. In practical terms, the School promotes a varied programme of physical activity. Every pupil, regardless of ability, should undertake an appropriate amount of physical exercise during the school week. Pupils should be encouraged to adopt a healthy and varied diet while at school. Pupils should be encouraged to develop a selflessness and social awareness in their thinking that extends both to their fellows and to the wider world and which generates a culture of giving and charitable involvement. The school seeks to encourage the pupils to contribute to the creative life of the School, not only as an end in itself but also as a means to good mental health.

## 11 Mental Health and Safeguarding:

- As per KCSiE 2024, Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Repton Prep School recognises though that staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse, neglect and exploitation, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Repton Prep School staff are ongoingly encouraged to be aware of how these children's experiences can impact on their mental health, behaviour and education.
- Indeed, Repton Prep School recognises 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. Harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.
- Repton Prep School has a Wellbeing Policy and clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Repton Prep recognises that pupils identified as being especially vulnerable in terms of mental health related concerns are potentially at greater risk than others.



- We have established processes and structures to ensure that all pupils' mental health and wellbeing is supported. **All staff** are trained to be alert to signs of a pupil who might be experiencing mental health problems and expected to share **any** such concerns with the DSL (using Wellbeing Manager – see Appendix 7 - or e-mail/telephone/face-to-face communication).
- As with all other safeguarding matters, in terms of pupil mental health concerns we look to communicate openly and work with parents as much as possible whilst always recognising the importance of taking a child centred approach.
- Education on mental health related matters is engrained in our curriculum (including PSHE / tutor sessions) and daily life in the School and boarding houses and about the school site.
- There are notices about the school site to highlight to pupils that they can access support from:
  - The School Nurse/Health and Wellbeing Centre
  - The School Doctor (Boarders)
  - Houseparent/House Assistant/House Tutor
  - Teachers
  - Years 5-8 Wellbeing Lead
  - The School Counsellor (and other members of the school counselling team)
  - Independent Listeners (Boarders)

[ If required, pupils can also access support from Repton and/or external sources too: e.g. NHS / CAMHS / private support ]

## 12 Domestic Abuse:

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

## 13 Children with special educational needs and children with disabilities:

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. This can include:

- Assumptions those indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.



In providing residential boarding accommodation to pupils, Repton Prep School is alert to the extra vulnerabilities of SEND children.

At Repton Prep School the Learning Enhancement Department takes the primary lead in supporting children with special educational needs, however **all staff** have a role to play in supporting pupils.

## **14 Looked after children (LAC) /private fostering:**

**Looked after children:** “A child who has been in the care of their local authority for more than 24 hours is known as a looked after child. Looked after children are also often referred to as children in care, a term which many children and young people prefer. Each UK nation has a slightly different definition of a looked after child and follows its own legislation, policy and guidance. But in general, looked after children are:

- living with foster parents
- living in a residential children's home or
- living in residential settings like schools or secure units

A child stops being looked after when they are adopted, return home or turn 18. However local authorities in all the nations of the UK are required to support children leaving care at 18 until they are at least 21. This may involve them continuing to live with their foster family”.

The NSPCC

### **Private Fostering:**

Repton Prep School is not involved in making arrangements for private fostering but a member of staff or volunteer becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should raise this in the first instance with the DSL. The DSL will notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child. The school will work with the local authority to review any Private Fostering arrangements to ensure that they remain suitable.

If any member of staff or volunteer has any reason to believe that the third party is failing to undertake a statutory duty, they should notify the police.

If direct arrangement of accommodation is made by the school for educational visits – home or away, including but not limited to sports visits, language exchanges, cultural exchanges, the school must request an enhanced DBS check (with barring information) for the host.

Reference to safeguarding support is provided in the EV Risk Assessment for all school overnight accommodation at education centres.

Host families in other countries cannot be checked in the same way by local authorities as we are at Repton Prep School. Therefore, we work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit. e.g. contact the relevant foreign embassy or High Commission of the country in question and find out if similar checks can be done in that country.

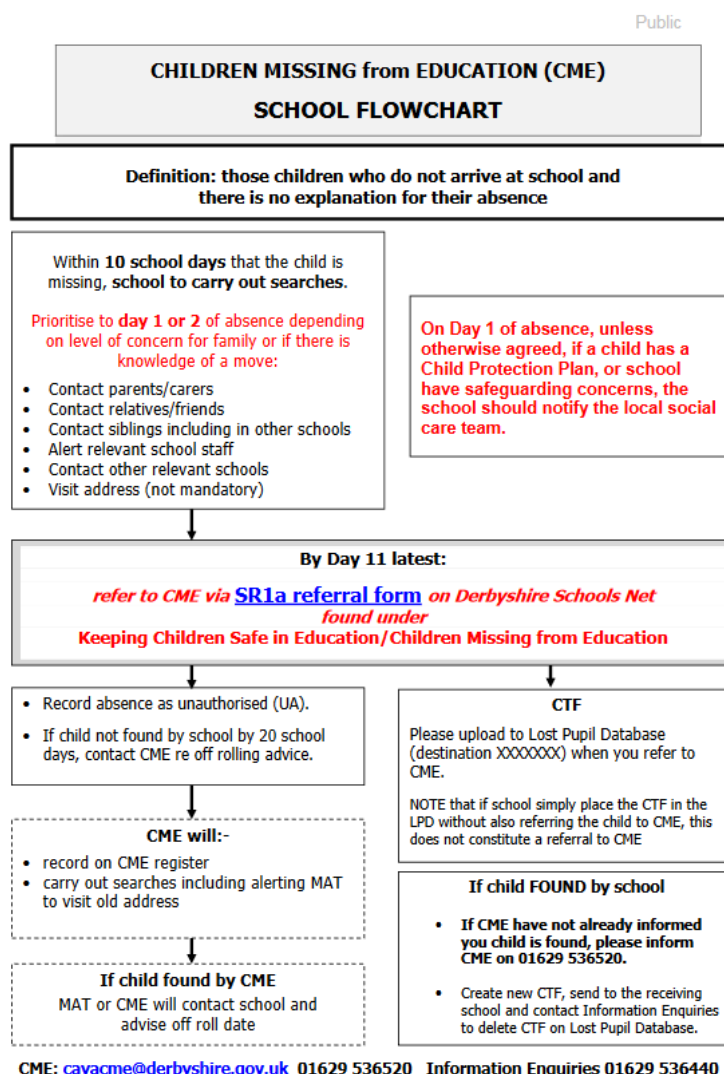
## Overseas Pupils and Private Fostering Arrangements:

Overseas pupils who stay with their guardian for more than 28 days have entered a Private Fostering Arrangement and under such circumstances a referral should be made by Repton Prep School to the relevant local authority where the pupil is staying.

## 15 Pupil Attendance and Children Missing from Education (CME)

It is the responsibility of the Form Tutor and School Office to follow up on children who are absent each morning. Regular or persistent absences will be reported to the DSL. Attendance rates will be monitored and parents contacted with regard to **any** concerns. It is expected that a normal healthy child will achieve an attendance level of at least 95% each year. Children whose attendance falls below 95% will be deemed to have 'poor' attendance and parents notified. Children whose attendance falls below 90% will be a cause for concern and the school will work with parents to improve this. Children whose attendance falls below 85% will be referred to the local authority. Please refer to our Attendance and Absence Policy for further information.

**All staff** should be aware that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign of a range of safeguarding issues. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation – particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling 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. Attendance rates are carefully monitored by school staff and all concerns of persistent absences and children missing education must be reported and checked against our school management system.



## **16 Abuse of one or more pupils on another pupil, including action taken to support both the alleged perpetrator (s) and alleged victim (s):**

We recognise that children can abuse other children. This is generally referred to as **child-on-child** abuse and can take many forms. This can include (but is not limited to):

- abuse within intimate partner relationships
- bullying (including cyberbullying)
- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or
- otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.
- sexual violence and sexual harassment between children in schools and colleges
- consensual and non-consensual sharing of nudes and semi-nude image and/or videos (sometimes referred to as 'sexting' or youth produced imagery). See 'Sharing nudes and semi nudes: how to respond to an incident': [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview)

### **Context**

- 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
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment
- Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support
- Staff should be aware that some groups are potentially more at risk
- Evidence shows girls, children with SEND and lesbian, gay, bisexual or gender questioning children are at greater risk. Also, pupils with certain medical or physical health conditions can face additional safeguarding challenges, both online and offline.
- Staff at Repton Prep are alert to the potential for inappropriate pupil relationships, and the potential for child-on-child abuse, in the boarding setting.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts
- educating pupils on why child-on-child abuse is unacceptable
- the likelihood that girls are more likely to be victims and boys perpetrators
- the fact that a child may be lesbian, gay, bisexual or gender questioning, is not in itself an inherent risk factor for harm, however they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning— whether they are or not – can be just as vulnerable as children who are. Risks can be compounded where children who are LGB or gender-questioning lack a trusted adult with whom they can be open. Staff should endeavour to reduce the additional barriers faced and create a culture for them to speak out or share their concerns with a member of staff.
- **All staff** should understand, that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).
- reporting concerns to the DSL

We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

***Recognising that dismissing or tolerating such behaviours risks normalising them. Staff at Repton Prep School must take a zero-tolerance approach abuse.***

## **17 Duties of Staff:**

*Staff should know...*

- Staff are an important part of the wider safeguarding system for children
- Safeguarding is **everyone's** responsibility, and **all staff** should ensure that their approach is child centred – whereby considering, at all times, what is in the **best interests** of the child.
- No single person (including member of staff) can have a full picture of a child's needs and circumstances. To ensure that children and families receive the right help at the right time then **everyone** who comes into contact with them (not least all members of Repton Prep

School staff) has a role to play in identifying concerns, sharing information and taking prompt action.

- School staff are especially important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- **All staff** have a responsibility to provide a safe environment in which children can learn
- **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- **All staff** should be prepared to identify children who may benefit from Early Help, noting that Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- Any staff member who has any concerns about a child's welfare should follow the processes set out in this policy and KCSiE 2024 and contact the DSL directly. Staff should be clear that they do not have to follow the hierarchical structure of the organisation where safeguarding is concerned. If the concern is raised out of term time, the nominated safeguarding lead for Repton Enterprise should be contacted, including the DSL in all communications. There will be clear communication sent to all staff before any holiday period with the relevant contact information and 'out of office' replies will contain key information.
- Staff should expect to support social workers and other agencies following any referral.
- The Designated Safeguarding Lead will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
- The Designated Safeguarding Lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
- The Teachers' Standards (latest update December 2021) state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

**All Staff** should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

- child protection policy, which should amongst other things also include the policy and procedures to deal with child-on-child abuse;

- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- staff behaviour policy (sometimes called a code of conduct) – which includes knowledge of the process of low-level concerns; allegations against staff and Whistleblowing; acceptable use of technologies (including mobile devices); staff/pupil relationships and communications including the use of social media and reasonable use of force.
- safeguarding response to children who have unexplainable and/or persistent absences from education.
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)

**Copies of the Pupil Behaviour Policy, Online Safety Policy (which includes the Acceptable Use of IT policy for staff and pupils) and a copy of Part One (or Annex A, if appropriate), Part 5 and Annex B of KCSiE 2024, should be provided to all staff at induction.**

- **All staff** should receive appropriate safeguarding and child protection training (including online safety which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training should be regularly updated.
- **All staff** should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- **All staff** should be aware of their local early help process and understand their role in it. Working Together to Safeguarding Children 2023 has a fuller definition of Early Help.
- **All staff** should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- **All staff** should know what to do if a child tells them he/she/they is/are being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care.
- Staff should never promise a child that they will not tell anyone about a report of **any** form of abuse, as this may ultimately not be in the **best interests** of the child.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

**Staff should:**

be alert to signs of abuse.
be aware of relationships in boarding and the potential dangers of bullying, sexual relationships, alcohol and drug misuse leading to abuse by peers.
be aware of the different avenues for the pupil to seek or be sign posted to early help, including but not restricted to, The Health & Wellbeing Centre, the School Chaplain, The School Counsellor, The Independent Listener.
be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk and potentially put children in danger.
take immediate action in the pupil's <b>best interest</b> by reporting any evidence of abuse and only involving those who need to be involved when a child tells them he/she is being abused or neglected.
share information with the DSL to support early identification and assessment of emerging problems and needs.
be aware of the process for making referrals to Children's Social Care and for the Statutory Assessments under the Children Act 1989, as well as knowing the role of the DSL and the School's Child Protection procedures.
be aware of the Derby and Derbyshire Safeguarding Procedures, <a href="https://derbyshirescbs.proceduresonline.com/index.htm">https://derbyshirescbs.proceduresonline.com/index.htm</a> and ensuring these procedures are followed;
enquire about the progress of individual cases in which they are/have been involved and thereafter accept their restricted role as the case becomes the province of other agencies.
avoid action that might prejudice any investigation by an external authority such as the police, Derbyshire Children's Social Care or the Local Authority Designated Officer.



**Staff should know that any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:**

- Is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day.

**Staff should be familiar with the types and signs of abuse, including indicators.**

(see Appendix 3 – Types and Signs of Abuse, Neglect and Exploitation, including Indicators)

**All staff** should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Other safeguarding issues **all staff** should be aware of include:

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



- Female Genital Mutilation (FGM)
- Mental Health
- Child-on-child abuse
- Serious violence

**Staff working with children are advised to maintain an attitude of “it could happen here” where safeguarding is concerned, and staff should always act in the best interests if the child.**

- If staff have **any** concerns about a child’s welfare they should act on them immediately (see Appendix 9 – Action where there are concerns about a child) by contacting the Designated Safeguarding Lead and following the Repton Prep School Child Protection Policy, with options then including:
  - Managing any support for the child internally via pastoral support processes
  - Undertaking an Early Help Assessment
  - Making a referral to statutory services (having made reference to the DDSCP Threshold Document).
- The Designated Safeguarding Lead (or Deputy DSL, and failing that a member of the senior management) should always be available to discuss safeguarding concerns
- Staff should not assume a colleague will take action and share information that might be critical in keeping children safe.
- Staff should be mindful that early information sharing is vital.
- Fears about sharing information must not stand in the way of the need to safeguard and promote the welfare of children.
- If early help is required then staff may be required to support the DSL and other agencies/professionals in an early help assessment (in some cases acting as the lead practitioner). Any such cases must remain under constant review and consideration should be given to a referral to children’s social care for assessment for statutory services (if the situation does not appear to be improving or is getting worse).
- Concerns about a child’s welfare should be referred to local authority children’s social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.
- Children’s social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

## **Children in need:**

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under Section 17 of the Children Act 1989.

## **Children suffering or likely to suffer significant harm:**

Local authorities, with the help of other organisations as appropriate, 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. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect and exploitation, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- any services are required by the child and family and what type of services

the child is in need and should be assessed under Section 17 of the Children Act 1989. (see Chapter One of Working Together to Safeguard Children provides details of the assessment process) [Working Together to Safeguard Children 2023](#)

- 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 under Section 47 of the Children Act 1989.

*[see Chapter one of Working Together to Safeguard Children for details of the Section 17 and Section 47 process:*

- If the referrer does not receive acknowledgement of the referral within one working day and a decision about the next steps / type of response then the referrer should follow this up.
- Staff (supported by the DSL/Deputy DSL) should do everything they can to support a statutory assessment following a referral being made.
- If the child's situation does not appear to be improving after a referral is made then the referrer should consider following local escalation procedures to ensure their concerns have been addressed and the child's situation improves.

**Staff must ensure that pupils should be taken seriously, kept safe and reassured so that they never feel like they are creating a problem for sharing concerns (including abuse, sexual violence or harassment)**

## **Record Keeping**

- Staff should also be aware that when dealing with safeguarding concerns, all discussions and decisions made, and the reasons for those decisions, should be recorded in writing.
- This will also help if/when responding to any complaints about the way a case has been handled by the school or college. Information should be kept confidential and stored securely.
- Information should be kept confidential and stored securely.
- It is good practice for the DSL to keep concerns and referrals in a separate child protection file for each child.
- Records should include:
  - a clear and comprehensive summary of the concern
  - details of how the concern was followed up and resolved
  - a note of any action taken, decisions reached and the outcome
- If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy)

## **Alternative Provision**

Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. Schools should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

## **Children not at risk of significant harm but in need of support**

When a pupil has not suffered and is not likely to suffer significant harm but needs additional support from one or more agencies, there should be an inter-agency assessment using local processes, including use of the 'Common Assessment framework ('CAF') and 'Team around the Child ('TAC')'.

## **18 Listening to pupils and what to do when faced with a disclosure of pupil absent and neglect:**

Repton Prep School provides a range of opportunities for pupils to be listened to, including: daily interactions with key staff (SMT/DH Pastoral & Boarding, form tutors, teachers, Heads of Year, House parents (boarders), tutors, domestic staff); tutor sessions; house meetings and house forums; wellbeing surveys; availability to talk to the School Nurse, the School Doctor, a member of the counselling team; the Head of Learning Enhancement (SEND).

Contact details for key staff – including the School Nurse/School Doctor at the Health & Wellbeing Centre; DH Pastoral; the Head of Learning Enhancement; counselling staff; the Independent Listener (boarders) – and NSPCC Helpline and other key helplines are made available to the pupils.

If a member of staff has **any** concerns about a child's welfare the member of staff should act on them **immediately and inform the DSL**.

- The School treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our staff are made aware of their duty to safeguard and promote the welfare of children in the School's care, in particular an awareness of relationships in boarding and the potential for abuse by peers. Staff members are alerted to the particular potential vulnerabilities of looked-after children.
- Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in the School is required to report instances of actual or suspected child abuse or neglect to the DSL or the Headteacher. This includes alleged abuse by one or more pupils against another pupil.
- **All staff** should recognise that children can abuse their peers. Different forms of child-on-child abuse can take, but abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. This is most likely to include, but not limited to the problems around sexting; bullying (including cyber bullying); peer pressure, gender-based violence/sexual assaults; pupils being sexually touched/assaulted; initiation/hazing type violence.
- Allegations of child-on-child abuse will be recorded, investigated and dealt with as per the school policies and procedures.
- Clear processes as to how victims (alleged), perpetrators and any other child affected by child-on-child abuse will be supported are outlined in the Behaviour Management Policy.
- The School's child protection procedures are not intended to prevent **any person** from making an immediate referral to Children's Social Care if there is a risk of immediate serious harm to a child. If staff members are unsure, they should always speak to the DSL. If another person makes a referral, they should inform the DSL as soon as possible. In exceptional circumstances, such as in an emergency, or if a child is in immediate danger, at risk of immediate harm, or if there is a genuine concern that appropriate action has not been taken by senior staff (including the Headteacher), any person, including members of staff in accordance with the Whistleblowing Policy, can speak directly to Children's Social Care and or to the police immediately, or refer the concern to the LADO.
- **All staff** and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures of the school safeguarding regime and that such concern will be taken seriously by the Senior Leadership Team.

- On becoming aware of an alleged, actual or suspected case of child abuse or neglect the member of staff should:
  - listen to the child, to provide re-assurance and record the child's statements, but not to probe, interrogate or put words into the child's mouth or ask outright whether s/he or others have suffered abuse
  - limit questioning to the minimum necessary for clarification
  - avoid leading questions
  - refrain from giving any inappropriate guarantees of confidentiality; instead the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility
  - remember that the priority is to protect the pupil. The matter should be taken seriously and staff must never think abuse is impossible in the School, or that an accusation against someone they know well and trust is bound to be wrong. They should listen but must not judge and should reassure the pupil that s/he has done the right thing in speaking to an adult. As soon as it is apparent that a pupil is likely to be informing the member of staff about abuse or exploitation of **any** type, they must make it quite clear to the pupil that they cannot offer confidentiality and that they will have to tell others. Only those with a need to know should be informed; staff must not speak to anyone about whom allegations are made. Staff should not attempt to carry out an investigation themselves. If the child comes back to talk at a later stage s/he should be advised that the member of staff cannot comment or advise but can listen
  - make and submit an accurate written record (to include the time, date, place and people who were present as well as what was said)
  - another member of staff should be present when interviewing pupils relating to serious incidents, and systematic notes of the interview should be taken
  - immediately inform the DSL, the deputy DSL, and/or the Headteacher, except where the allegation(s) concern the DSL or a member of staff, the report should go directly to the Headteacher.
- If, after a referral the child's situation does not appear to be improving, the DSL or the person who made the referral should press for re-consideration to ensure their concerns have been addressed and the child's situation has improved.

#### **Pupil making a disclosure – Step by step action:**

You <b><u>must not</u></b> promise confidentiality
Ask if the pupil they would be more comfortable with another member of staff present. Keep yourself safe at all times
Listen carefully. Keep an open mind.  If able to do so, make a written record of what is said by the pupil – including the pupil name, date & time of disclosure, key information of what is said ("what, when, where").  The pupil and member of staff should sign the written record and this should be kept securely and given to the DSL at a later point in time.

<p>Reassure the pupil, but do not promise confidentiality.</p> <p>Explain that a formal process will follow, following School policy.</p> <p>Do NOT make any attempt to investigate further.</p>
<p>Ensure the safety of the pupil within the School [Immediately contact the Police if it is an allegation of serious harm]</p>
<p>At the earliest opportunity contact the <b>DSL / Deputy DSL</b></p> <p><i>If it is an allegation against a member of staff contact the <b>Headteacher</b> and contact the Chairman of the Governing Body if the allegation is about the Headteacher</i></p> <p>Send a summary of the disclosure to the DSL via Wellbeing Manager (or by e-mail to the Headteacher if the allegation is against a member of staff). A Low-Level concern regarding an adult can also be reported as per the policy.</p> <p>Do not share information with anyone else.</p>
<p>The DSL / Deputy DSL will liaise and refer matter to the appropriate agencies (no issue is expected to be solely dealt with by one individual)</p>
<p>The DSL / Deputy DSL will seek advice from the Local Authority on the best course of action.</p>
<p>The DSL / Deputy DSL will inform Children's Social Care / Call Derbyshire, Starting Point within 24 hours if a referral is required and continue to communicate with Children's Social Care the Local Authority as required.</p>
<p><i>*Note - Any individual can contact Call Derbyshire, Starting Point / Police at any time to gain support, liaise or refer matters to the appropriate agencies</i></p>

- When there are safeguarding concerns (as opposed to a child being in immediate danger) about a pupil there should be a conversation with the DSL to agree a course of action, although **any** staff member can make a referral to children's social care. The DSL will refer to Derbyshire Children's Social Care safeguarding procedures and consult and share all the information with the appropriate Local Authority Child Services, who can provide appropriate advice and support as to next steps and referral routes.

<https://derbyshirescbs.proceduresonline.com/>

- If the safeguarding concerns involve a member of staff the School will consult and share all available information with the Derbyshire LADO and follow his advice.

- If there is abuse by one or more pupils against another pupil, then reference should be made to the Anti-Bullying Policy. Allegations should be reported to the DSL (who is also the Deputy Head Pastoral and Boarding). Where there are allegations of serious abuse by one pupil against another, it must be referred to an external agency, such as Derbyshire Children's Social Care or the police. All children involved, whether perpetrator or victim, should be treated as being 'at risk'. Support will be offered, and a risk management plan put in place to ensure the safety of the pupils concerned.
- The DSL will report safeguarding concerns to the Headteacher and the Safeguarding Governor, including the Chair of Governors where appropriate. Where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm, a referral to Derbyshire Children's Social Care it is important that the safeguarding concern is reported immediately. The DSL and/or the Headteacher should liaise closely with and act on the advice of Derbyshire Children's Social Care and must ensure that all information pertinent to the case is communicated as the failure to pass on a critical piece of information could materially affect the advice given. In response, the LA should decide, within one working day of a referral being made, about the course of action it is taking and should let the referrer know the outcome.
- The School will, with informed advice from an external safeguarding agency (such as Derbyshire Children's Social Care or the police), follow relevant statutory guidance concerning working with and sharing information from parents regarding their child's alleged involvement in serious incidents of pupil-on-pupil abuse. Unless an external agency advises to the contrary, parents will be told about safeguarding incidents/issues at the earliest opportunity and the relevant information will be shared with them. However, the School may make a referral to DDSCP without parental consent. For the avoidance of doubt, referrals do not require parental consent. When sharing information and providing support, the school will treat victims and perpetrators equally.
- Borderline cases will be discussed with Derbyshire Children's Social Care without identifying the individuals concerned in the first instance. Derbyshire Children's Social Care will advise whether an allegation or concern meets the relevant threshold. Derbyshire Children's Social Care, the DSL and the Headteacher will decide in the circumstances what further steps should be taken. This could involve informing parents and calling the police.
- The DSL and the Headteacher will ensure that staff do not discourage pupils from making complaints. The police and Children's Social Care are well versed in providing appropriate support and their work must not be hindered.
- Each child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children. Systems are in place for the child to express their views and give feedback. Ultimately, this system operates with the **best interests** of any children involved.



## 19 Pupil Voice

As part of Repton Prep's Safeguarding and Child Protection measures, pupils have access to the anonymous reporting tool, Whisper, where they can safely report any concerns or issues they may have. Whisper allows for two-way communication, ensuring that pupils receive appropriate help, advice and feedback in response to their reports, fostering a secure environment where their voices are heard and acted upon. The DSL and DDSL respond to each report, acknowledging the report and providing initial reassurance. If necessary, the report is investigated and relevant actions taken. Updates and a conclusion are given to the person who made the report, ensuring this is done age-appropriately (if the report is anonymous, the feedback is still pupil age orientated.) If the person is known, and it is deemed appropriate, updates and feedback may be given in person. Should the report/concern be about a member of staff, volunteer, visitor to the school or contractor, the Low-Level concern procedure will be initiated, ensuring due regard for both the pupil and the adult involved.

## 20 Good working practices – Staff Guidelines

In line with safer working practices; the Staff Employment Handbook and the Code of Conduct, staff should be guided by safer working practices and the following advice in an attempt to avoid false allegations and situations which may give rise to misinterpretation:

- Avoid whenever possible unobserved situations of one-to one contact with a child. If they are unavoidable, always keep a door open and try to ensure that you are within the hearing of another member of staff. Additionally, beyond core school day hours (8am to 6pm) it is good practice to inform a pupils' houseparent (or the DSL) about a one to one meeting and relevant details (time, location, purpose for the meeting).
- Unless there is no sensible alternative do not transport children alone in your car. However, if it is unavoidable, it is essential that:
  - an appropriate senior member of staff, such as the relevant House Parent, Deputy Head Pastoral or other Deputy Head, is aware of the journey in advance
  - the pupil sits in the back seat of the vehicle with their seatbelt fastened
  - member of staff carries a mobile phone
  - another adult with a completed DBS check will accompany the trip
  - any concerns are reported immediately to the DSL and followed up with a written statement.
- Staff should be mindful that the boarding environment presents greater opportunities for contact between pupils and staff, both formal and informal, and staff in all their dealings with pupils, both boarding and day, should be guided by the following advice:
- Do not engage in, or allow, any sexually provocative games whether based on talking or touching or engage in "horseplay" involving pupils.
- Never make suggestive or discriminatory comments to a pupil.
- Never enter a pupil's room where a pupil may be changing his/her clothes without getting his/her consent to enter. Members of staff visiting boarding houses, particularly those housing members of the opposite sex, must exercise discretion and common sense.



- Avoid “favouritism” and singling out “troublemakers”.
- Never trivialise child abuse or safeguarding matters.
- Members of staff should not meet pupils in their homes – with the exception of houseparents/house tutors who still need to ensure that all safeguarding measures are in place and there is no risk to the member of staff or pupil(s).

For further guidance, staff should refer to the School’s Code of Conduct.

## **21 Safeguarding concerns and allegations against staff or another adult in the school (including supply teachers, volunteers and contractors):**

Safeguarding allegations or concerns (no matter how small) may be made against a member of staff, a volunteer, a Governor, a pupil, parent or other person connected to the School. Abuse allegations against staff will be dealt with according to the statutory guidance set out in Part 4 of KCSiE 2024 and section two of the DDSCP (formerly DSCB) procedures Allegations Against Professionals. It will be followed in respect of all cases in which it is alleged that a teacher or member of staff (including a 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; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm if they work regularly or closely with children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Further information: [Guidance on making a referral to the DBS \(.gov.uk\)](https://www.gov.uk/guidance/what-to-do-if-you-are-concerned-about-a-child-in-your-school)

Staff and volunteers who hear a safeguarding allegation or concern against another member of staff or volunteer should immediately report the matter to the Headteacher, unless the Headteacher is the person against whom the allegation is made, in which case the allegation must be made to the Chair of Governors. In the Chair of Governors absence, the allegation should be reported to the Liaison Governor for Safeguarding.

In the case of serious harm, the Headteacher (or Chairman of Governors or liaison Governors for Child Protection as appropriate) should inform the police immediately.

Where the allegation(s) concern the DSL the staff member should report the matter to the Headteacher, or, in their absence, to the Chairman of Governors or the liaison Governor for Child Protection.

In the event of an allegation being made against a member of staff, the Headteacher will immediately, and without further investigation, consult with the DSL as appropriate and refer the matter to the

LADO. It is essential that all information pertinent to the case be communicated to the LADO as the failure to pass on a critical piece of information could materially affect the advice given. Only if the allegation were trivial or demonstrably false would a referral not be warranted. The LADO's advice will be sought in borderline cases via the advice request/referral form. The LADO's role is not to investigate the allegation but to ensure an appropriate investigation is carried out. Where it is clear that an investigation by the police or Children's Social Care services is unnecessary, the LADO's advice should be taken as to how the allegation should be dealt with; it is possible that the school will be allowed to investigate the allegation and deal with the member of staff in accordance the School's disciplinary procedure. Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.

The adult to whom the allegation relates should not be informed without the explicit consent of the LADO.

If there is a conflict of interest in reporting a safeguarding concern to the Head, or in the event of an allegation being against the Headteacher or a member of the Governing Body, the Chairman of Governors or, in their absence, the liaison Governor for Child Protection, should be contacted immediately to determine whether the details of the allegation are sufficient to warrant an investigation. If there is reason to suppose abuse could have occurred, s/he will immediately, without further investigation and without informing the Headteacher refer the matter to the LADO. In any case, any safeguarding allegation or concern against the Headteacher or a member of the Governing Body can be referred directly to the LADO. Only if the allegation were trivial or demonstrably false would a referral not be warranted. The LADO's advice will be sought in borderline cases. The LADO can also be contacted directly.

If the allegation concerns a member of staff or a volunteer, he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The individual should be advised to contact their trade union representative, if they have one. The School will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

If the allegation or concern relates to a member of supply staff, the agency will be notified and fully involved. Allegations or concerns against a member of staff who no longer work at the school (and non-recent allegations) will be referred to the police.

The parents of the pupil will be involved of the allegation as soon as possible, if they do not already know of it – although where external agencies are involved the communication with the accused and parents will not occur until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process.

### **Suspension:**

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. If the case manager is

concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the designated officer(s), children's social care or the police as required. But suspension is highly unlikely to be justified based on such concerns alone.

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school or college is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the designated officer(s). In cases where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the school or sixth form college, immediate action should be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work.

The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases, an investigation can be resolved quickly and without the need for suspension. If the designated officer(s), police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

- Redeployment within the school or college so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children
- Redeploying to alternative work in the school or college so the individual does not have unsupervised access to children;
- Moving the child or children to classes where they will not meet the member of staff, making it clear that this is not a punishment and parents have been consulted;
- Or temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or work for the local authority or academy trust.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the designated officer(s). This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the governors of the school. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the designated officer(s) should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school or college consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.

Any further action will be taken with in accordance with Part 4 of KCSiE 2024 and the School's employment procedures.

The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it) or malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive) or 'unfounded' (to reflect cases where there is no evidence or proper basis which supports the allegation being made). If it is established that the allegation is false, unsubstantiated or malicious, no details of the allegation will be retained on the individual's personnel records, and it will not be referred to in employer references. In all other circumstances, a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice.

If the allegation is made against a member of the boarding staff who is resident in a boarding house, it may be appropriate for the School to place the individual concerned in alternative accommodation away from children, particularly if that person is suspended.

During the course of the investigation the School in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils. Parents or carers should be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

Any pupils who are involved will receive appropriate care.

Any further action will be taken with in accordance with Part 4 of KCSiE 2024 and the School's employment procedures.

As a school we will apply the views of the LADO, KCSiE 2024 and WTSC 2023 when making a decision about suspension. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

**Timescales** - It is in **everyone's** interest to resolve cases as quickly as possible and is consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are provided from KCSiE 2024: the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets should be achieved in all but truly exceptional cases. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months. See KCSiE 2024 and WTSC 2023 for further details.

If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff, the School will consider making a referral to the Teaching Regulation Agency (TRA) and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found at [Teacher Misconduct - the prohibition of teachers \(.gov.uk\)](https://www.gov.uk/teacher-misconduct)

The School will report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child.

We will consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be an appropriate action. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in Teacher misconduct: the prohibition of teachers (October 2020). Further guidance is published on the Teaching Regulation Agency website. [Teaching Regulation Agency \(.gov.uk\)](https://www.gov.uk/teaching-regulation-agency)

**Confidentiality:** It is extremely important that when an allegation is made, the school make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting

restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.” This means that any individual who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates’ court to request that reporting restrictions be lifted.) The case manager should take advice from the designated officer(s), police and children’s social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip

The School follows Disclosure and Barring Services (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. The School will report to the DBS, within one month of leaving the School any person (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. The requirement to make referrals of this nature is a legal duty and failure to refer when the criteria are met is a criminal offence.

If the Headteacher is wholly satisfied that the pupil or pupils is/are not at risk of significant harm and that a reportable offence has not been committed, he will consider the separate need for disciplinary action. In that case, an investigation at School level will be appropriate.

**Allegations against a teacher who is no longer teaching or is deceased should be referred to the police. Non-recent allegations of abuse should be referred to the police.**

## 22 Low level Concerns

Repton Prep School looks to promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This includes sharing **any** concerns about adults, no matter how small, responsibly and with the right person, recorded and dealt with appropriately. Doing so should encourage an open and transparent culture; enable Repton Prep School to identify any



concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Repton Prep School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

If in any doubt regarding information sharing about a member of staff (including supply teachers, volunteers and contractors) as a low-level concern meets the harm threshold, then Repton Prep will consult with the LADO.

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

- humiliating pupils
- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone not in line with school policies
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- or, using inappropriate sexualised, intimidating or offensive language.

When dealing with low level concerns Repton Prep School will follow the Staff Code of Conduct, behaviour policies and safeguarding policies; ensuring that procedures are implemented effectively, and appropriate action is taken in a timely manner to safeguard pupils.

**Low Level Concerns should be reported to the DSL (SAE) or the DDSL (KCa) as soon as possible who will inform the Headteacher and Deputy Heads of such concerns. Alternatively, if preferred, a concern might be reported directly to the Headteacher. If the low level concern relates to the DSL then such concerns should be reported directly to the Headteacher. Reports of low-level concerns will be recorded in writing by the DSL, noting who raised the concern (unless wishing to remain anonymous, which should be respected as much as is reasonable), details of the concern, the context in which the concern arose and the action taken.**

Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

## Procedure

Staff should refer to the Low-Level Concern flowchart (Appendix 18) when reporting a concern about a member of staff.

Reports of low-level concerns should be recorded in writing, with details of the concern, the context in which it arose and action taken. When a low-level concern has been raised by a third party, the Headteacher should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible.

Records of low-level concerns will be reviewed by the SMT on a regular basis in order that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. This is a standing item on the SMT agenda. Where a pattern of behaviour is identified, the SMT will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harm threshold is met. The school will 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.

## Self-reporting and social media

All staff are made aware that they should not be in contact with children (please note a child refers to pupils up to the age of 18) via social media/messaging services and should self-report if they have been contacted by a child on social media, or if they have had any contact with a child via social media or messaging services. Staff members are also encouraged to report anything concerning such as online harassment or bullying, so we can support them.

## Whistleblowing

**All staff** are required to report **any** concerns to the Headteacher about poor or unsafe safeguarding practices at Repton Prep School; potential failures to properly safeguard the welfare of pupils or any action by staff or pupils that represent a safeguarding risk. If a member of staff feels unable to share a concern with the Headteacher then they should contact the Chairman of the Governors.

Staff should be aware that the NSPCC whistleblowing advice line – 0800 0280285 / 0800 800 5000 / [help@nspcc.org.uk](mailto:help@nspcc.org.uk) – is available for staff who do not feel able to raise safeguarding concerns internally. [Whistleblowing Advice Line | NSPCC](#)

## 23 Confidentiality and information sharing

The DSL will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations. Where a pupil who is subject to a child protection plan is moving to another school, the DSL will ensure their child protection file is securely transferred to the new school as soon as possible. This file will be transferred separately from the main pupil file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of



abuse and have support in place for when the child arrives. Where allegations have been made against staff, the DSL will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom. Information sharing is essential in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including educational outcomes. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance Information Sharing was published by the Government in July 2018 [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/682211/information-sharing-advice-for-practitioners.pdf) and in the 'Myth Busting Guide' (Working Together, 2018 (amended Dec 2020)).

### Self-reporting

If you have been involved in an accident, incident, conversation or situation which has made you feel uncomfortable, that might have been misinterpreted, or you feel might be used against you, **REPORT this to the Designated Safeguarding Lead (Stuart Elks)**. This might include....

- A suggestive comment from a pupil
- Accidental or embarrassing physical contact
- A misunderstanding
- A confrontation
- An instance where physical restraint or reasonable force was necessary.

## 24 Safer recruitment & safe employment practices and the Single Central Register (SCR)

As part of a whole school approach to safeguarding, Repton Prep School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations.

In addition to carrying out safe recruitment procedures, as set out in KCSiE 2024, members of the teaching and support staff at the School (including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches) are subject to the necessary statutory DfE/DBS checks. In addition, any other relevant checks deemed necessary before starting work, including an additional check to ensure that they are not prohibited from teaching. Also, all shortlisted candidates will be subject to an online search to help identify any incidents that have happened and are publicly available online that might be explored with the applicant at interview. Please refer to the School's Staff Recruitment Policy and Part Three of KCSiE 2024 for further details.

All governors, volunteers, and contract staff who are akin to employees are also subject to the relevant statutory checks. Confirmation is obtained that appropriate Child Protection checks and procedures apply to **any** staff employed by another organisation and working with the School's pupils at Repton Prep School, Repton Site or on another site.

For information on Disclosure and Barring Service Criminal Record Checks and Barred List Checks see Flowchart in Appendix 11.

## 25 Visitors and visiting speakers:

Repton Prep School has a *Visitors and Visiting Speakers Policy*, which includes references to volunteers and contractors.

The school's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values, and that the visitor does not present any safeguarding risks.

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

Volunteers and visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these.

**Any** member of staff wishing to arrange for a visiting speaker to address pupils (on site or online) must inform the DSL; undertake an internet search to research the profile and background of the speaker; complete the Visiting Speaker Form and adhere to our safeguarding requirements. In some cases, the school may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Any communication between pupils and visitors must be supervised and monitored by a member of staff. Email addresses or social media information should not be communicated to pupils either verbally or via a presentation. Any individual communication should be via the member of staff organising the visiting speaker. In the rare circumstance that an email communication might be made, it must be via school email (preferably by a member of staff) to a company email address (never a personal one) and the houseparents **must** be copied into **all** communication.

For on-site visits the speaker will need to formally sign-in; be given a Visitors Lanyard and be accompanied by a member of staff throughout their visit to be confident that there is no unsupervised access to pupils.

## 26 Preventing Extremism and Radicalisation

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism; this is known as the Prevent duty.

- Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many ways and settings. Specific background factors may contribute to vulnerability, which are often, combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alerted to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the **Channel** programme.

### **'Channel'**

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to establish an effective multi-agency referral and intervention process to identify vulnerable individuals.

The Channel process aims to provide support to individuals at risk of being drawn into violent extremism. It draws on existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

It has three objectives:

- to identify individuals at risk of being drawn into violent extremism.
- to assess the nature and extent of that risk.
- to develop the most appropriate support for the individuals concerned.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- **Risk assessment:** The risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Staff should be able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.
- **Working in Partnership:** Safeguarding arrangements take into account the policies and procedures of DDSCP (formerly DSCB) [Derby and Derbyshire Safeguarding Children Partnership](#)
- **Prevent awareness training:** All staff receive appropriate training on their responsibilities and how to identify children at risk of being drawn into terrorism and to

challenge extremist ideas. The DSL regularly undertakes Prevent awareness training to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

- **IT Policies:** Suitable filtering and monitoring is in place to help ensure that pupils are safe from terrorist and extremist material when accessing the internet in schools. All pupils' sign up to the Acceptable Use Policy and are provided with education to teach them about staying safe, including online

### **Procedure / Guidance / Reporting**

- Any worry or concern/concern that a child or young person may be exposed to possible extremism, extremist ideology and or radicalisation needs to be treated as a safeguarding concern and follow the guidance provided in the above policy.
- Referrals of vulnerable students / pupils are made into the Channel process, by the DSL, to provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- In this case the DSL also acts as the SPOC (Single Point of Contact)

## **27 PSHE (Personal, Social, Health & Economic) Education and SMSC (Spiritual, Moral, Social & Cultural) education developments:**

There is a separate policy which covers Repton Prep School's approach to PSHE (Personal, Social, Health and Economic) education. It also incorporates the school's Relationships Education, Relationships and Sex Education (RSE) and Health Education Policy.

Repton Prep School's PSHE curriculum is designed to cover both the content of statutory guidance on the RHSE and other pertinent topics which are an important aspect of the personal development of our pupil body.

Relationships, Sex and Health Education became mandatory in all Schools from September 2020 and includes a number of key topic areas on both relationships education and physical and mental wellbeing.

In addition to these statutory elements of the course, the Repton Prep School's PSHE programme is designed to ensure that there is necessary preparation for citizenship in the years to come and covers areas such as ethical and responsible consumerism, financial decision making and other elements of citizenship such as voting. There is an emphasis on a spiral curriculum with the lessons in Repton Prep School building towards the curriculum at Repton School.

The content and delivery of the course at both Repton Prep and Repton Senior is designed to encourage respect for others with regard to protected characteristics. Throughout the course principals are actively promoted which encourage respect for other people, paying particular regard to characteristics set out in the Equality Act 2010 (age, disability, gender, reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, or belief, sex and sexual orientation).

The statutory elements of the PSHE course are delivered through timetabled PSHE lessons at both the Prep and Senior site.

Other elements of the PSHE programme are delivered through the tutor programmes and additional pastoral initiatives such as World Mental Health Day, Anti-Bullying Week, Lunar New Year and Black History Month, amongst others.

Importantly the PSHE programme across both Schools recognises that young people today are growing up in an increasingly complex world and living their lives in parallel on and off-line. This presents both positive and exciting opportunities, but also potential risks.

The School aims to ensure that in this environment our pupils are educated to know how to stay safe and healthy, and how to manage their academic, personal, and social lives in a positive way. In doing so the School works to ensure that all content in the PSHE programme is age-appropriate and taught in a sensitive and inclusive way.

**Key Topic areas covered in Statutory Guidance:**  
[RSE and Health Education](#)

Repton Prep	Repton Senior
<p><i>Relationships Education (RE):</i></p> <ul style="list-style-type: none"> <li>*Families and people who care for me</li> <li>*Caring friendships</li> <li>*Respectful relationships</li> <li>*Online relationships</li> <li>*Being safe</li> </ul>	<p><i>Relationships and Sex Education (RSE):</i></p> <ul style="list-style-type: none"> <li>*Families</li> <li>*Respectful relationships, including friendships</li> <li>*Online and media</li> <li>*Being safe</li> <li>*Intimate sexual relationships, including sexual health</li> </ul>
<p><i>Physical and Mental wellbeing:</i></p> <ul style="list-style-type: none"> <li>*Mental wellbeing</li> <li>*Internet safety and harms</li> <li>*Physical health and fitness</li> <li>*Health eating</li> <li>*Drugs, alcohol and tobacco</li> <li>*Health and prevention</li> <li>*Basic first aid</li> <li>*Changing adolescent body</li> </ul>	<p><i>Physical and Mental wellbeing:</i></p> <ul style="list-style-type: none"> <li>*Mental wellbeing</li> <li>*Internet safety and harms</li> <li>*Physical health and fitness</li> <li>*Health eating</li> <li>*Drugs, alcohol and tobacco</li> <li>*Health and prevention</li> <li>*Basic first aid</li> <li>*Changing adolescent body</li> </ul>

It is recognised that Repton Prep plays a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

Repton Prep has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the School's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities).

## **28 Teaching pupils how to keep themselves safe, including the delivery of 'Prevent' strategy:**

### **Teaching pupils how to keep themselves safe:**

Importantly the PHSE programme across both Schools recognises that young people today are growing up in an increasingly complex world and living their lives in parallel on and off-line. This presents both positive and exciting opportunities, but also potential risks. The School aims to ensure that in this environment our pupils are educated to know how to stay safe and healthy, and how to manage their academic, personal and social lives in a positive way. In doing so the School works to ensure that all content in the PSHE programme is age-appropriate and taught in a sensitive and inclusive way.

### **Prevent:**

Like all schools and colleges, Repton Prep and Repton School is subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty and forms part of our wider safeguarding obligations.

As part of teaching pupils how to keep themselves safe, one element of this relates to Prevent.

Many of the core aspects of PHSE are based around the Values and Aims of the School and alongside this Repton Prep School seeks to actively promote the fundamental British values (FBV) of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. The School works to actively promote these specified fundamental British values and continues to make reference to these values in tutor periods and through pastoral initiatives.

The School also aims to provide a safe place in which pupils can learn, understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

The School also makes reference to the Prevent Duty Guidance, where we have "due regard to the need to prevent people from being drawn into terrorism". We aim to create a culture in which pupils and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

Specific reference is made to radicalization and extremism in Year 10 when a series of dedicated lessons cover the importance of community cohesion and challenging extremism. Included in these lessons are content on:

- Living in Britain
- Communities, inclusion, respect and belonging
- British values
- The Equality Act and Hate Crimes
- How social media may distort, mis-represent or target information in order to influence beliefs and opinions

## **29 Online safety – Use of technology and arrangements for use/access, including filtering and monitoring:**

It is essential that children and staff are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

**content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

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

**conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying

**commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils or staff are at risk, this should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

### **Repton Prep School**

- Repton Prep School has an Acceptable Use Policy and Online Safety Policy.
- The safe use of technology is a key part of the Repton Prep School curriculum. ICT safety measures are part of the curriculum and are regularly reinforced in lessons/assemblies/talks/the boarding houses/about the school site/ on school trips.



- Pupil and staff access to the School Network is managed through filtering and monitoring systems (using *Smoothwall*) to ensure that IT is being used in a safe and appropriate manner and that their effectiveness is regularly reviewed.
- It is acknowledged though that pupils can obtain unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst at school or college, can potentially sexually harass, bully and control others via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. **All staff should be alert to this safeguarding threat and report concerns to the DSL immediately.**
- The School will communicate with parents/carers and guardians about online filtering and monitoring systems, as well as online safety information and education given to Repton Prep pupils.

### 30 Use of mobile phones and cameras / photography

#### Pupils:

Depending on the age of the pupil, the time of the school day and the context (in the classroom, in the houses, about the school site, on trips/visits, etc.) there are specific rules on access to and use of mobile phones. Staff at Repton Prep School are alert to these rules, to ensure that pupils use of mobile phones is appropriate and does not present a safeguarding risk.

#### Staff:

Staff are briefed on appropriate use of their own IT devices, including a clear message that images of children must not be stored on any personal mobile phone. Once they have been taken, they should be immediately uploaded to the school system and then erased on personal devices. The DSL will ensure that staff are aware of any pupil where permission has not been granted by the parent / guardian for the pupil to be photographed (or where there is limited consent).

When taking images or recording videos of pupils in a professional setting, staff should:

- ensure that all pupils are appropriately dressed
- be mindful of not causing distress, upset or embarrassment to the pupil(s)
- make every effort to ensure that the images demonstrate the context of the educational setting
- avoid taking images or video recordings in inappropriate settings (e.g. changing areas / washrooms / the swimming pool).

Full details of use of cameras and recording equipment can be found in Repton Prep's Taking, Storing and Using Images of Children policy.

#### Parents & Guardians / Visitors:

Parents & Guardians, and visitors to the school, are made aware of the need for sensitivity and respect when taking images / filming of their own children (mindful of other children who are nearby).



In particular, all parents/ guardians of new pupils are provided with the Parental Photography of Pupils Statement and asked to complete a Photography Consent form (see Appendix 12).

## **31 Parents**

We inform parents/guardians in the introductory guide that staff are required by law to follow the correct procedures if they suspect a child is a victim of abuse.

In general, we believe that parents should be informed about any concerns regarding their children. It is important that we are honest and open in our dealings with parents.

Unless an external agency advises to the contrary, parents will be told about safeguarding incidents/issues at the earliest opportunity and the relevant information will be shared with them.

In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation or place the child at further risk. In such cases, advice will be sought from the LADO and/or Derbyshire Children's Social Care.

# APPENDICES

## **Appendix 1**

### **Other related policies – Repton Prep School**

These policies can be found on the Repton Prep School website:

<https://www.reptonprep.org.uk/key-information/policies>

Acceptable IT Use Policy
Anti-Bullying Policy
Drug & Substance Misuse Policy
Health & Safety Policy Statement
Online Safety Policy
Parental Photography of Pupil Policy
Physical Contact Policy
PSHE Policy
Pupil Behaviour Management Policy
Statement of Boarding Principles
Staff Recruitment, Selection and Appointment Policy
Supervision Policy
Visitors and Visiting Speakers Policy

### **Other important documents/information/policies:**

Admissions Policy
Boarding House Risk Assessments
Exclusion, Removal and Review Policy
Guardianship Policy
Missing Pupils Protocol
Repton Prep Code
Serious Incidents Protocol
Staff Employment Handbook & Staff Code of Conduct

Single Central Register
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## Other related policies – Repton Prep:

These policies can be found on the Repton Prep School website:

<https://www.reptonprep.org.uk/key-information/policies>

Admissions Policy
Anti-Bullying Policy
Behaviour Management Policy
Online Policy
Early Years Foundation Stage (EYFS) Policy
Exclusions Policy
Guardianship Policy
Health & Safety Policy
Missing Child Policy
Supervision of Pupils Policy

## Other important documents/information/policies:

Communication with Parents Policy
Data Protection Policy
ICT Network Acceptable Use Policy
Medical Confidentiality and Consent Policy
EDIB and Equal Opportunities Policy
Physical Restraint and Intervention Policy
Safer Recruitment, Selection and Appointment Policy
SEND
Parent and Staff Handbooks
Staff Employment Handbook (includes Whistleblowing use of mobile phones)
Staff Code of Conduct
Taking, storing and Using Images of Children



## **Appendix 2**

### **References to key statutory guidance, external documents, research and publications:**

- Keeping Children Safe in Education 2024  
[Keeping Children Safe in Education 2024](#)
- Working Together To Safeguard Children 2023:  
[Working Together to Safeguard Children 2023](#)
- Sexual Violence and Sexual Harassment Between Children In Schools and Colleges:  
[Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](#)
- What To Do If You Are Worried A Child Is Being Abused:  
[Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](#)
- National Minimum Standards of Boarding:  
[National Minimum Standards for Boarding Schools](#)
- 'Sharing nudes and semi nudes: how to respond to an incident':  
[Sharing nudes and semi nudes - how to respond to an incident](#)

Information sharing: [Information Sharing - Advice for practitioners](#)

Disqualification under the Childcare Act 2006:

[Disqualification under the Childcare Act 2006 - GOV.UK \(www.gov.uk\)](#)

Extremism and Radicalisation:

- [The Prevent duty - Advice for Schools and Childcare Providers](#)
- <https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>
- [Prevent Duty Guidance for England and Wales](#)
- [Safeguarding and Radicalisation](#)

Mental Health related:

- Student Mental Health & Wellbeing: Insights from higher education providers and sector experts (June 2021)  
[Student Mental Health and Wellbeing Survey](#)

#### Online Safety:

- Further information from Child Exploitation Online Protection Centre (CEOP) provides updated sexting guidance and Searching screening and confiscation advice for schools.  
<https://www.ceop.police.uk/Safety-Centre/>
- The UK Council for Child Internet Safety (UKCCIS) Education Group has published advice for schools and colleges on responding to sexting incidents and initiation/hazing type violence and rituals.  
<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

#### Safer Recruitment:

- Safer Recruitment Consortium: <https://saferrecruitmentconsortium.org/>

## **Appendix 3**

### **Types and signs of abuse, neglect and exploitation including indicators:**

**All** staff should be aware of indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

Abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**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 seeing, hearing or experiencing the effects of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

Different categories of child abuse are defined in KCSiE 2024:

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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, or experiencing the effects of 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 the child is aware of what is happening or not. 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. The sexual abuse of children by other children is a specific safeguarding issue in education.

### **Neglect:**

Neglect refers to 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.

### **Child-on-child abuse:**

**All staff** should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online.

**All staff** should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported.

**All staff** should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. Any concern about possible child-on-child abuse should be reported to the Designated Safeguarding Lead or Deputy DSLs (using *Create a Concern* in Wellbeing Manager / telephone /e-mail / face-to-face communication).

All child-on-child abuse is unacceptable and will be taken seriously although there is recognition of the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be the victims and boys the perpetrators).

Different forms of child-on-child abuse can take place.

1. Bullying (including cyberbullying)
2. 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) and sexual harassment.
3. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
4. youth produced sexual imagery (sometimes referred to as "sexting") – consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
5. Upskirting
6. initiation/hazing type violence and rituals



It is essential that **all staff** understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

### **Contextual Safeguarding:**

Assessments of children should consider the wider environmental factors affecting the child’s life that may pose a threat to their safety and/or welfare.

1. Where possible Houseparents and staff are asked to provide as much contextual information as possible as part of the referral process.
2. Further information on Contextual Safeguarding and Assessment frameworks:

<https://www.contextualsafeguarding.org.uk/>  
[The legal and policy framework for Contextual Safeguarding approaches: A 2020 update on the 2018 legal briefing | Contextual Safeguarding](#)

It is essential that **all staff** are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to/from conflict zones, FGM and forced marriage.

Staff must also be aware of the following forms of abuse, as outlined in Part 1, KCSiE 2024:

**Child Sexual Exploitation:** Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

**Child Criminal Exploitation:** Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- in exchange for something the victim needs or wants, and/or
- for the financial or other advantage of the perpetrator or facilitator and/or

- through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:: 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; and children who regularly miss school or education or do not take part in education.

### **Sexual violence, sexual harassment and sexual abuse:**

Child-on-child abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control, between children. Child-on-child abuse is one of the most significant risks facing our children today. Sexual violence and sexual harassment are two specific forms.

1. staff should be aware of sexual violence and sexual harassment with regards to child-on-child abuse
2. Staff should be aware of how to investigate, report and support victims and perpetrators of sexual violence and/or sexual harassment

*Further information provided:*

[Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

### **Upskirting:**

Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. (KCSIE 2024, Pt 1):

Upskirting is an important part of pupil and staff safeguarding education and training. Education on Upskirting is embedded in Repton Prep School's PSHE programme, referred to as part of all new staff safeguarding induction training.

### **Female Genital Mutilation:**

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

**All staff** with teaching responsibilities have a specific legal duty to act with regards to concerns about female genital mutilation (FGM), but **all staff** should speak to the DSL where there are concerns.

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a

risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines.

Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

If a member of staff discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

[FGM - \(.gov.uk\)](https://www.gov.uk)

[Services for women and girls with FGM](https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilation-fgm/)

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilation-fgm/>

<https://learning.nspcc.org.uk/child-abuse-and-neglect/fgm>

<https://learning.nspcc.org.uk/child-abuse-and-neglect/fgm#references-and-resources>

### **Further information on so-called 'honour based' abuse**

So-called 'honour-based' abuse (HBA) encompasses crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

There is a range of potential indicators that a child may be at risk of HBA.

If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk). Guidance on the warning signs that FGM or forced marriage may be about to take place, or

may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61) and pages 13-14 of the Multiagency guidelines: Handling case of forced marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

## Preventing Radicalisation

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism; this is known as the Prevent duty.

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many ways and settings. Specific background factors may contribute to vulnerability, which are often, combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alerted to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the **Channel** programme. Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to establish an effective multi-agency referral and intervention process to identify vulnerable individuals. The Channel process aims to provide support to individuals at risk of being drawn into violent extremism. It draws on existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community. It has three objectives: to identify individuals at risk of being drawn into violent extremism; to assess the nature and extent of that risk; to develop the most appropriate support for the individuals concerned.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- **Risk assessment:** The risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. Staff should be able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

- **Working in Partnership:** Safeguarding arrangements take into account the policies and procedures of DDSCP (formerly DSCB) <https://www.ddscp.org.uk/>
- **Prevent awareness training:** All staff receive appropriate training on their responsibilities and how to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The DSL regularly undertakes Prevent awareness training to provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- **IT Policies:** Suitable filtering is in place to help ensure that pupils are safe from terrorist and extremist material when accessing the internet in schools. All pupils' sign up to the Acceptable Use Policy and are provided with education to teach them about staying safe, including online.

The Regional Coordinator (East Midlands) for Prevent is Sam Slack:  
[sam.slack@education.gov.uk](mailto:sam.slack@education.gov.uk).

### Procedure/Guidance/Reporting:

- Any worry or concern/concern that a child or young person may be exposed to possible extremism, extremist ideology and or radicalisation needs to be treated as a safeguarding concern
- Referrals of vulnerable students / pupils are made into the Channel process, by the DSL, to provide early intervention to protect and divert people away from the risks they face and reduce vulnerability
- In this case the DSL also acts as the SPOC (Single point of Contact)

**Online Abuse and other online risks:** All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues.

Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline.

Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

**Symptoms of Stress and Distress:** An abused child will usually show signs of stress and distress, among which are those listed below. It must be remembered that many of these may have nothing to do with abuse but are worth consideration in trying to understand the pupil's behaviour. (more information can be accessed from <http://www.nspcc.org.uk/> )

A fall-off in school performance	Excessively affectionate or sexual behaviour towards adults or other children	Disturbed sleep
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Aggressive or hostile behaviour	Regression to more immature forms of behaviour	A change in eating patterns
Difficulties in relationship with peers	Self-harming or suicidal behaviour	Going missing from education or home

## **Appendix 4**

### **Sexual violence, sexual harassment and sexual abuse:**

#### **Sexual violence:**

Staff at Repton Prep School should be aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. This can happen both inside and outside of school.

When referring to sexual violence KCSiE 2024 makes reference to the Sexual offences Act with sexual violence being described as:

**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:**

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

#### **Sexual harassment:**

When referring to sexual harassment this refers to 'unwanted conduct of a sexual nature' that can occur online, offline, which is within 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. If not challenged, sexual harassment can normalise inappropriate behaviours and provide an environment that can lead to sexual violence.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making

sexual remarks about clothes and appearance and calling someone sexualised names

- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature
- upskirting

and online sexual harassment may include:

- consensual and non-consensual sharing of sexual images and/or videos
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats
- coercing others into sharing images of themselves or performing acts they are not comfortable with online.

*Taking and sharing nude photographs of U18s is a criminal offence. UKCIS Sharing nudes and semi-nudes: [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people) provides advice for education settings working with children and young people*

### **Upskirting:**

- The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.
- ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- It is a criminal offence.
- Anyone of any gender, can be a victim.

### **The response to a report of sexual violence or sexual harassment**

- The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- If staff have a concern about a child or a child makes a report to them, they should follow the referral process
- As is always the case, if staff are in any doubt as to what to do they should speak to the DSL (or Deputy DSL).



## Ofsted's review of sexual abuse in schools and colleges (published 10<sup>th</sup> June 2021)

In light of Ofsted's review of sexual abuse in schools and colleges (published 10<sup>th</sup> June 2021), Repton Prep School is even more committed to promoting a culture where sexual harassment and online sexual abuse are not tolerated, and where pupils feel they are able to speak up, issues identified and early intervention helps to better protect pupils.

To achieve this, Repton Prep School is committed to:

- a carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'.
- high-quality training for teachers delivering RSHE.
- routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse.
- a behavioural approach, including sanctions when appropriate, to reinforce a culture where sexual harassment and online sexual abuse are not tolerated.
- working closely with Local Safeguarding Partners (LSPs) to ensure Repton Prep School is aware of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour
- support for designated safeguarding leads (DSLs), such as protected time in timetables to engage with LSPs
- training to ensure that **all staff** (and governors, where relevant) are able to:
  - better understand the definitions of sexual harassment and sexual violence, including online sexual abuse
  - identify early signs of child-on-child sexual abuse
  - consistently uphold standards in their responses to sexual harassment and online sexual abuse

### [Review of sexual abuse in schools and colleges](#)

<b>How Repton Prep School staff should respond to a concern or disclosure about sexual violence, sexual abuse or sexual harassment:</b>
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Failure to recognise, acknowledge and understand the scale of harassment and abuse in schools can lead to a culture of unacceptable behaviour, an unsafe environment and, potentially, a culture that normalises abuse leading to children accepting it as normal and so not come forward to report it.

Staff at Repton Prep School should always be alert to sexual harassment, sexual abuse and sexual violence and act immediately on any concerns following safeguarding procedures.

### **How to respond:**

#### *Remember:*

- All victims should be reassured that they are being taken seriously
- All victims should be informed that the law is in place to protect children (rather than criminalise them)
- **Any** form of abuse (including out of school / online) should not be downplayed.
- A victim should never be made to feel ashamed for making a report or their experience minimised.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment.

#### *In practical terms:*

- Two members of staff present (including the DSL / Deputy DSL)
- If there is an online element staff must remember not to view or forward illegal images of a child
- Do not promise confidentiality
- Only share information with key staff (DSL)
- Staff should remember that a child making a disclosure has placed them in a position of trust and so should be supportive and respectful of the child.
- Children may not be able to recall all details or a timeline of events.
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to

devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

- Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.
- Informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

### **Next Steps:**

- When there has been a report of sexual violence **the DSL** should make an immediate risk and needs assessment
- When there has been a report of sexual harassment **the DSL** should consider, on a case by case basis, if there is a requirement for a risk assessment
- A risk and needs assessment should consider:
  - the victim, especially their protection and support
  - whether there may have been other victims
  - the alleged perpetrator(s);
  - the time and location of the incident and any action taken to make the location safer;
  - all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
- The risk assessment should be kept under review and amended as required.
- The DSL should ensure that they engage with children's social care and specialist services as required.
- Important considerations will include:
  - the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
  - the ages of the children involved
  - the developmental stages of the children involved
  - any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?

- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- are there ongoing risks to the victim, other children, adult students or school or college staff
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- Potential contact between victim and perpetrator in school (same classroom, etc.)
- Any intra familial harms and any necessary support for siblings following incidents
- As always when concerned about the welfare of a child, **all staff** should act in the **best interests** of the child. In all cases, schools and colleges should follow general safeguarding principles as per KCSiE 2024.
- Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted)

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. Staff should remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

It is important to consider every report on a case-by-case basis.

Repton Prep School will work with external agencies to best understand the most appropriate steps after a report of sexual violence or harassment. There are though, typically, four likely scenarios:

- Manage internally
- Early Help
- Referral to children's social care
- Report to the Police

For more details, including guidance on how best to support the victim, how best to support the alleged perpetrator and managing the situation within the school setting can be found on page 126 to 131 of KCSiE 2024.(pages 122-139)

## **Appendix 5**

### **The use of ‘reasonable force’**

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people.

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.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, staff should, where possible, consider the risks carefully recognise the additional vulnerability of these groups. Staff should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. Where appropriate, the School plans positive and proactive behaviour support, drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents/guardians. This attempts to reduce the occurrence of challenging behaviour and the need to use reasonable force.

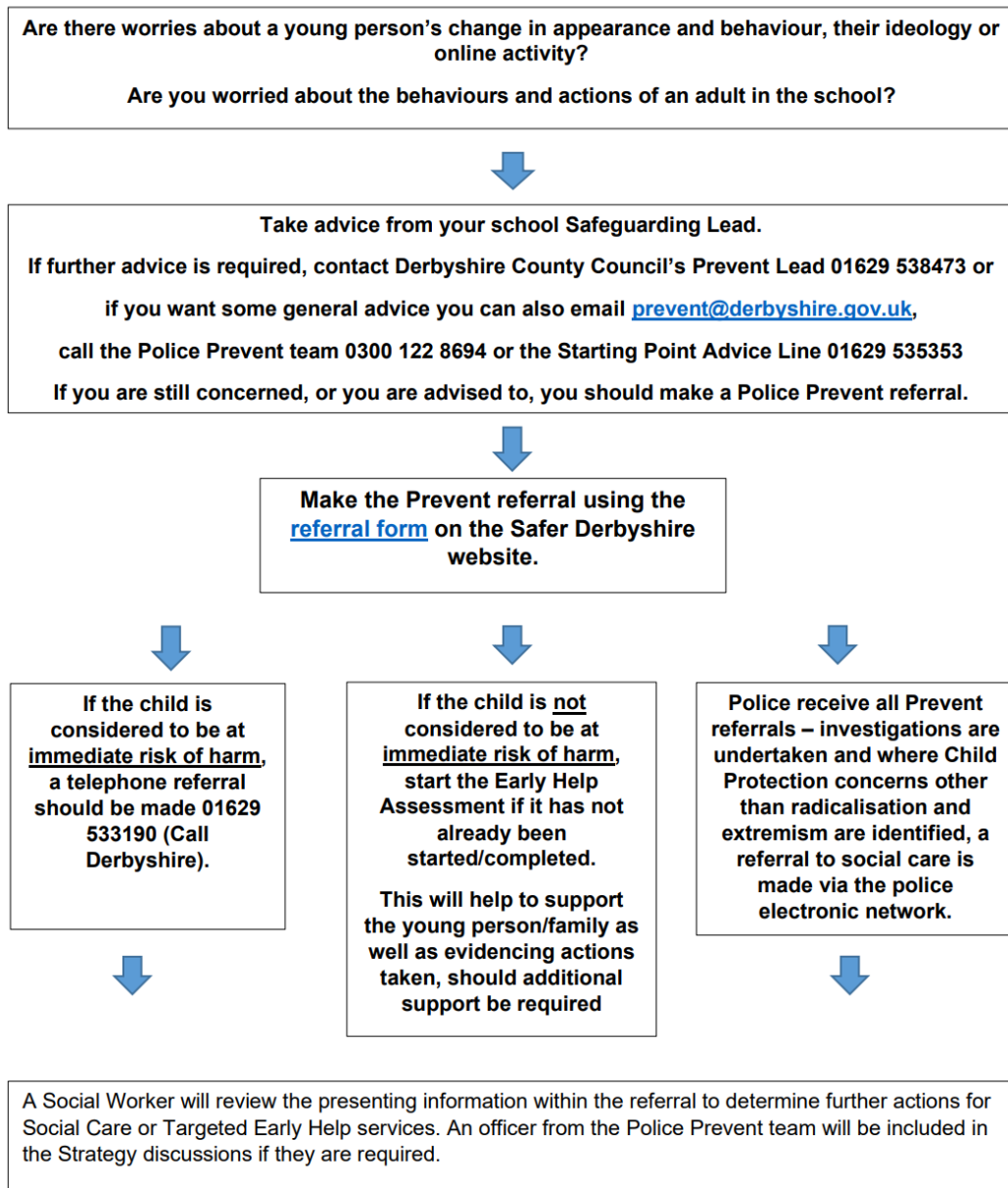
Further information: [Use of reasonable force in schools](#)

## **Appendix 6**

### **PREVENT referrals Pathway:**

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#### **Prevent Referrals – Pathway**



*NB – Whilst the Police Prevent Team can recognise vulnerabilities and support the safeguarding process, they are primarily focused on Counter Terrorism and Domestic Extremism risk. Please make sure other safeguarding measures (including Early help Assessments) are progressed in a timely manner.*

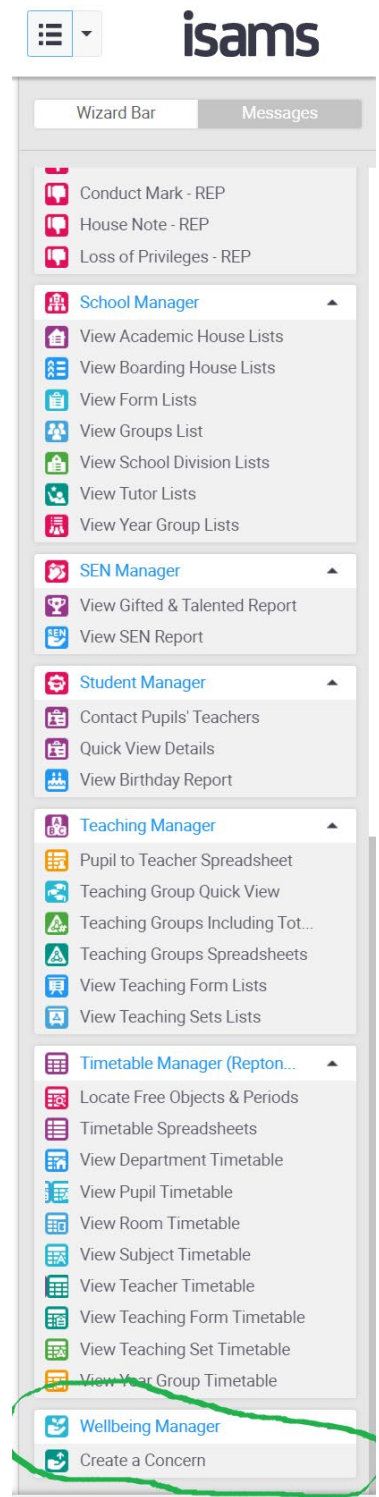
Schools Prevent Pathway v3.1

## Appendix 7

### Wellbeing Manager (iSAMS) – Creating a Concern: Staff Guide

#### Raising a concern:

A concern can be created by any member of staff who has an iSAMS Account, using the “Create a Concern” link on the wizard bar (see right).



You will see the following when you select

## Creating a concern:

Wellbeing Manager - Mozilla Firefox

https://repton.isams.cloud/main/areas/pastoral/wizards/create-concern.html

### New Concern Wizard

This wizard allows for creating a new concern.

Use the form below to record the concern details.

**Concern Occurrence:**

Student:

Date/Time:

Staff Member:

Location:

**Concern Details:**

Category:

Nature:

Details:

**Options:**

Set Visibility: ☒

Add Additional Students: ☒

Step 1 of 4

Next Close



*Enter the relevant details...*

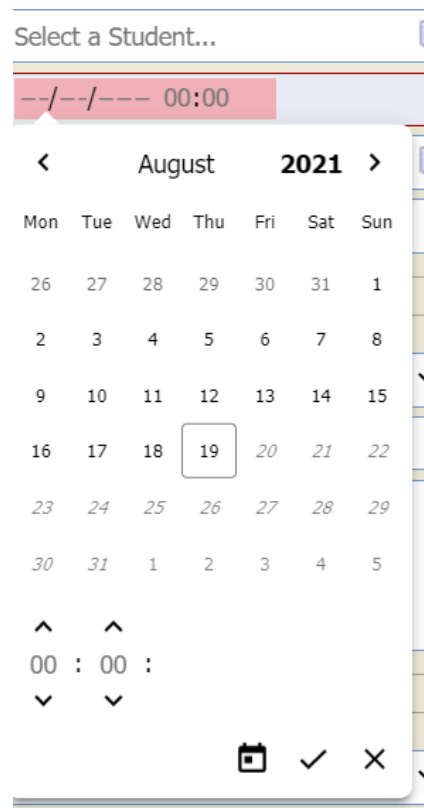
**Student:** Type the first few letters of the use surname and then the full name should appear and you can then select the pupil name you want.

**Date/Time:** To select the date you need to click on date that you want and then click on the tick symbol to confirm the date you want.

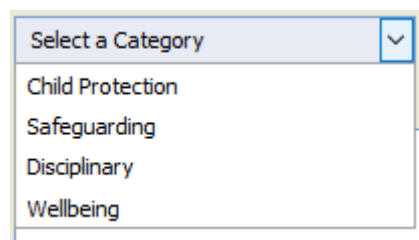
**Staff Member:** Enter your name (start entering the first few letters of the surname and then select the name from the drop-down options that appear).

**Location:** Enter the relevant location

**Category:** Choose one of the following options (Child Protection, Safeguarding, Disciplinary, Wellbeing, Filtering & Monitoring Academic (for academic linked wellbeing issues))



Provide additional information about the Concern using *Nature* and *Details*



De-select the tick box for *Set Visibility*

If there are no other pupils linked to the concern that you are raising, then de-select the tick in the box next to *Add Students*.

Once all the information has been entered, select *Next*.

ice:

Student: Amélie Naylor

Date/Time: 18/09/2019 17:46 ×

Staff Member: Select a Staff Member

Location:

Category: Safeguarding

Nature:

Details:

Set Visibility: ☐

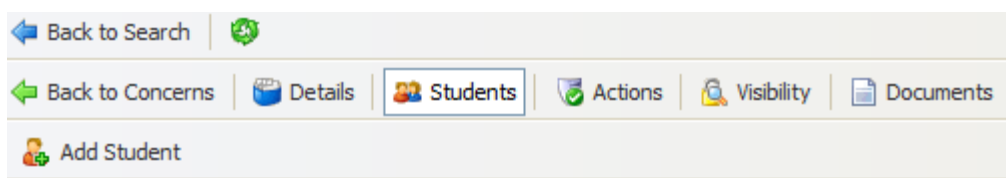
Add Students: ☐

Once you have done this you have raised a concern – using **Create a Concern** – and the DSL / Deputy DSL will receive a notification so that they are aware and they will respond to the concern as necessary.

Once the DSL / Deputy DSL has received notification of a concern, they will then decide on the best course of action.

The DSL / Deputy DSL might then use other functions within Wellbeing Manager, including:


- Using *Visibility*, Adding additional members of staff in on a specific concern: essentially Form Tutors, Heads of Year, House Parents, and members of the Pastoral Support Team (Head of Learning Enhancement / School Nurse/ counselling staff).
- Using *Students*, adding any other students who are relevant to the concern (as Bully, Victim, Bystander, Subject, Perpetrator)
- Setting *Actions* for individual members of staff - again Form Tutors, Heads of Year, specific teachers, House Parents, and members of the Pastoral Support Team (Head of Learning Enhancement / School Nurse/ counselling staff). These will be specific tasks in follow up to the raised concern.
- Uploading relevant documents – uploading saved Word (need to be saved as *doc.exe* files), pdf or e-mail files



## Responding to an Action/Creating a new Action:

### 1. Entering the Outcome to an action that has been created

Enter the outcome to an existing action    Add a new action to a concern

1 Click  in the concern that you want to work with.  
A popup window is displayed:

Save & Close    Close window

Use the form below to record the action outcome.

Action Details:

Due Date: 2018-03-29T00:00:00+01:00

Outcome: Clara's mother said that she might be upset as she could not find her favourite toy this morning

2 Use the free text box to enter the **Outcome** of the action.

3 Click **Save & Close**.  
The action is listed as 'Complete' and removed from the user's **dashboard**.

## 2. Creating a new Action to a raised concern

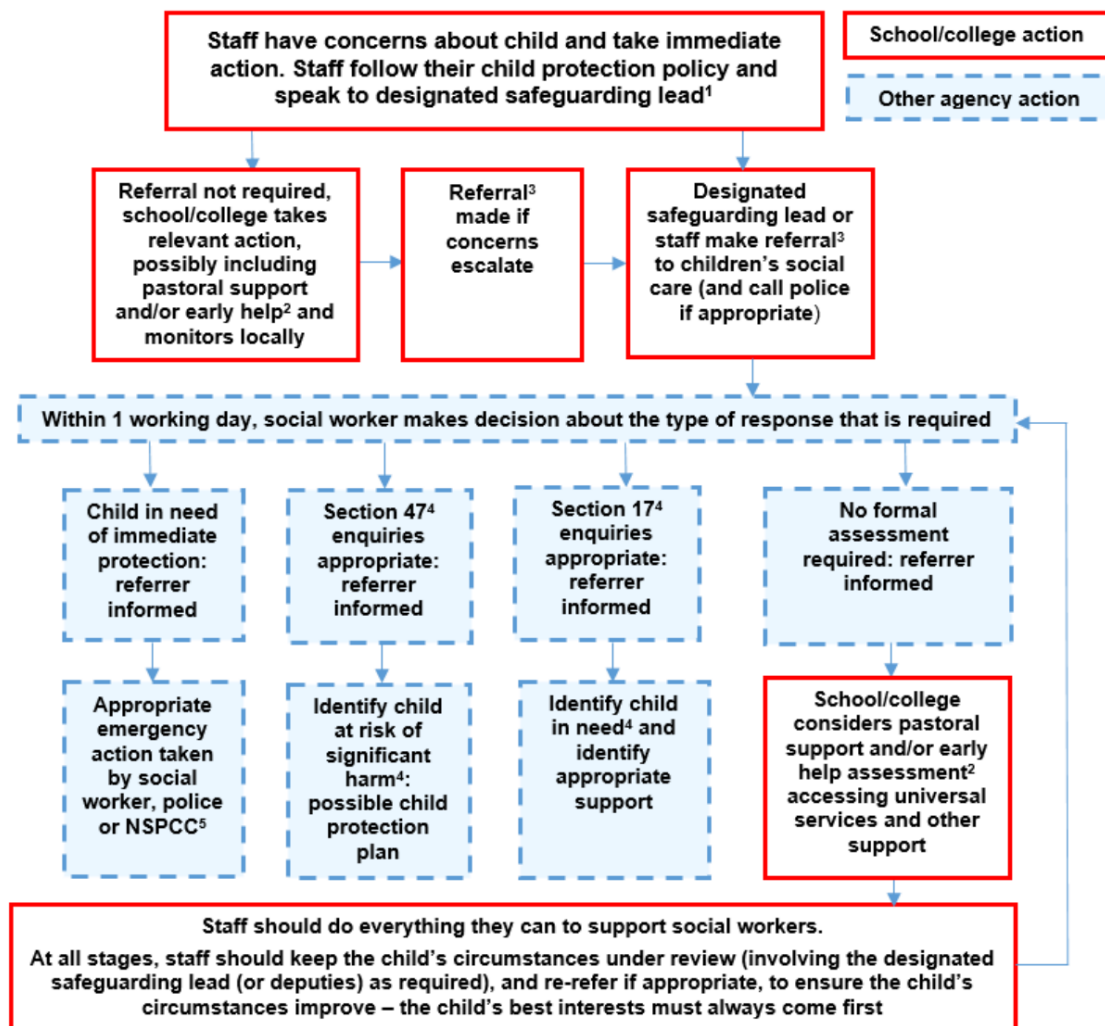
Enter the outcome to an existing action

Add a new action to a concern

- 1 In the **Action Details** section, use the drop down lists to select the **Type** of action to be taken and **Assign** the action to a user.
- 2 In **Due Date**, select a date that the action must be completed by.
- 3 Enter more details of the action to be taken in the **Description** box.
- 4 Click **Create Action** in the top left.  
The action is listed at the bottom of the tab and on the selected user's dashboard.

## Appendix 8

### Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

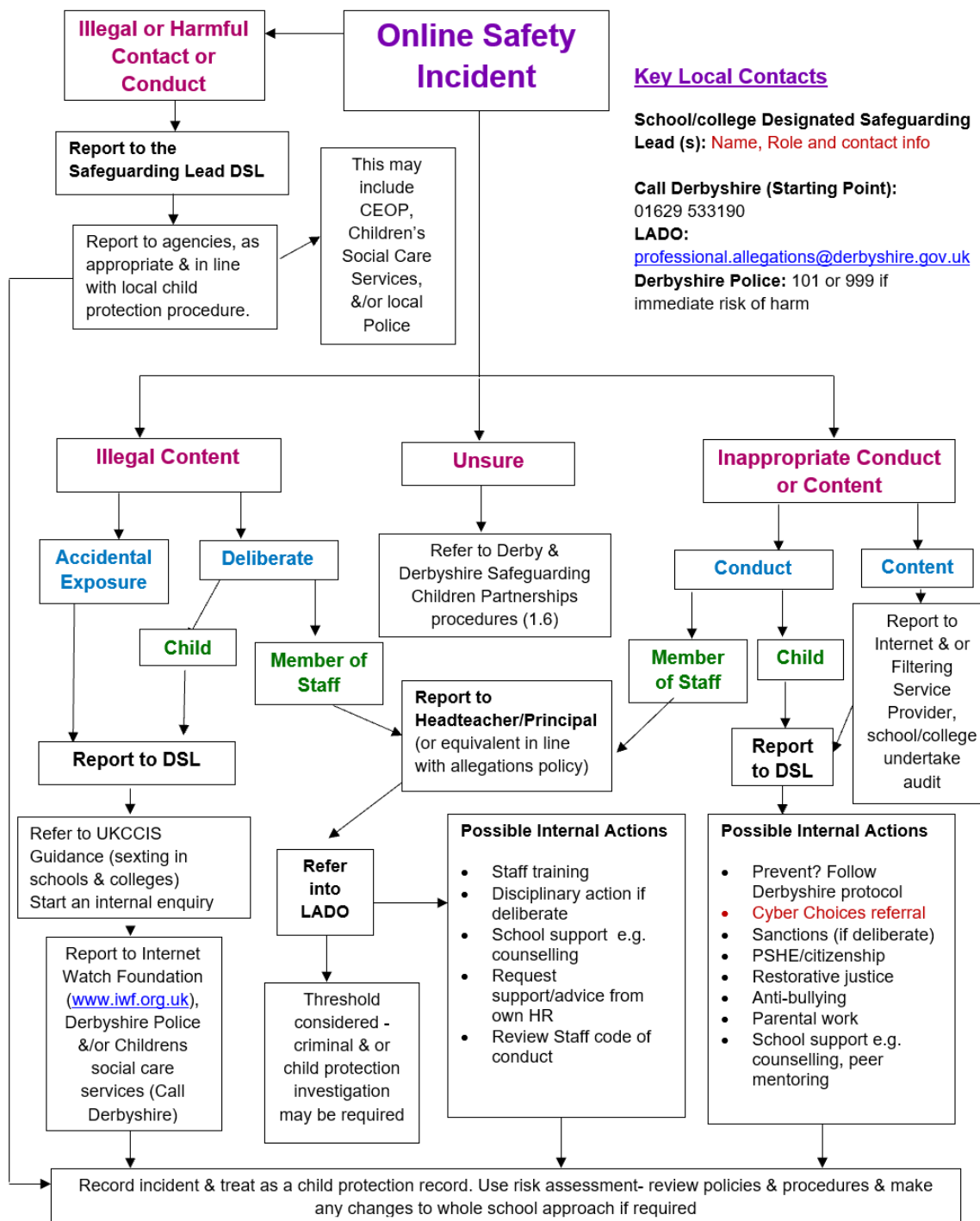
<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Appendix 9

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# Responding to an Online Safety Concern

Insert School/college/Education Setting Logo



Reformatted with kind permission from theeducation people, Online Safety Education Advisor, [www.kesi.org.uk](http://www.kesi.org.uk)

Version 3 - 2020/21. DP CPM Schools/Education

04/12/2020

## **Appendix 10**

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

*Further information on County Lines can be found on the NSPCC website:*

### **NSPCC: Protecting children from County Lines**

#### **[Advice on County Lines](#)**

## **Appendix 11**

### **Serious violence**

There are a number of indicators, which may signal 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 and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

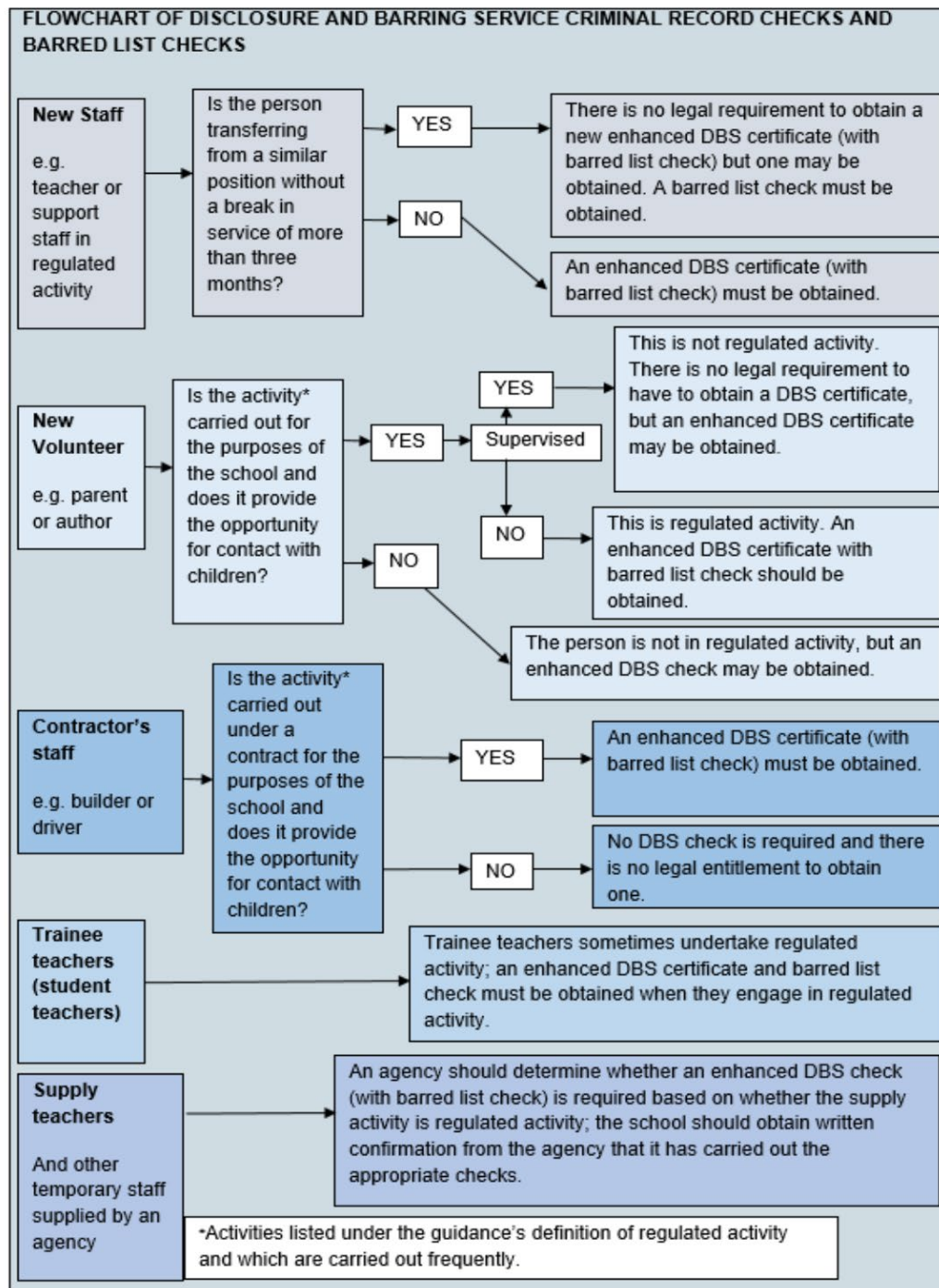
A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.



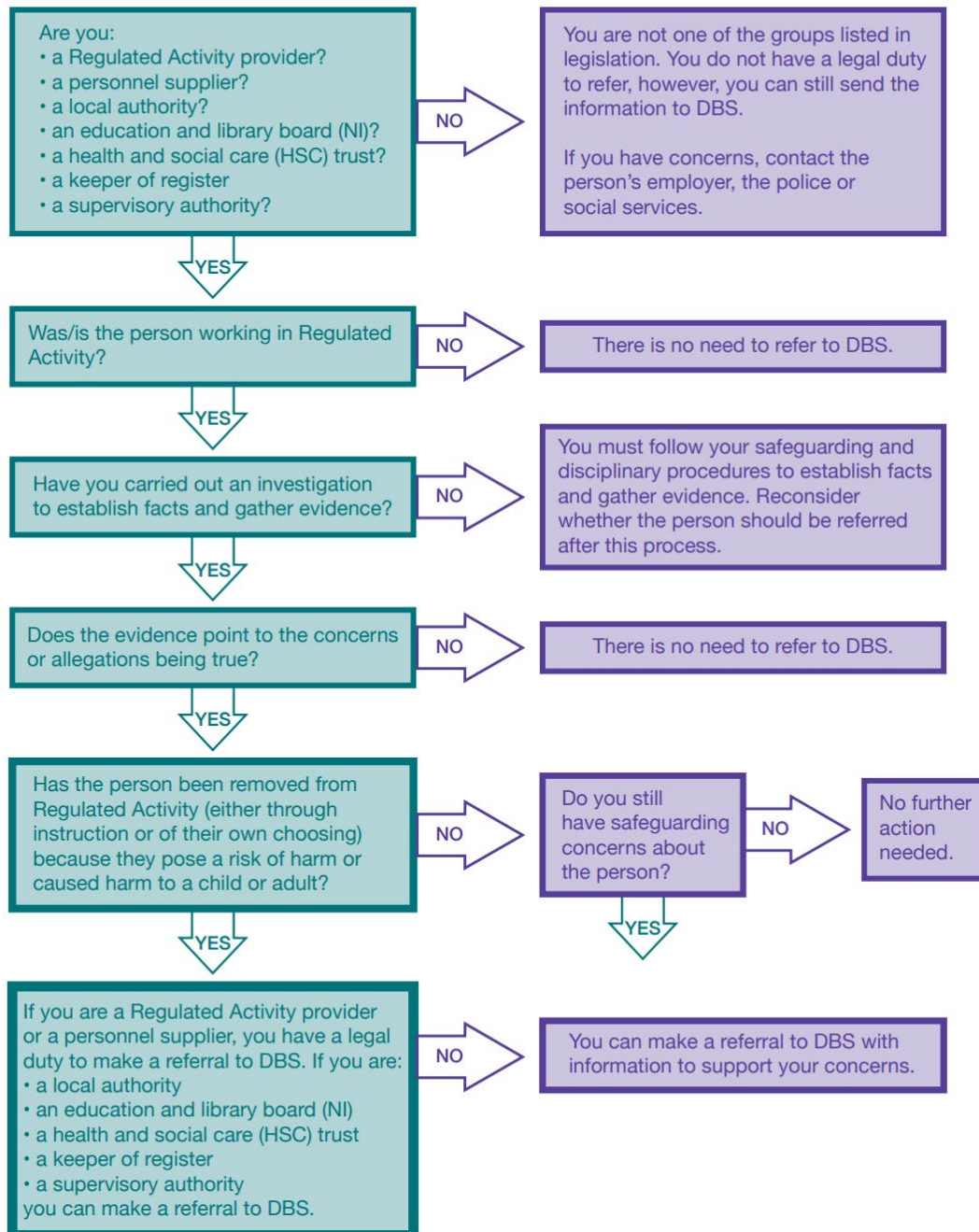
## Appendix 12

### Flowchart of Disclosure and Barring Service Criminal Record Checks and Barred List Checks:



# Barring referral flow chart

We have put together the following flow chart to help you decide if it is appropriate to refer someone to us.



## **Appendix 13**

### **Parents and Photography:**

#### **PARENTAL PHOTOGRAPHY OF PUPILS STATEMENT**

It is recognised that parents may wish to make a personal family record of their child's activities at school such as sporting events and official functions. This may include digital images, DVDs, videos, and photographic prints.

Parents are welcome to make such a record, subject to the following conditions:

- Parents are permitted to take photographs of their own children. Inclusion of other children should be incidental or restricted to team photographs; otherwise, photographs of other pupils should not be taken without the prior agreement of the child's/children's parents.
- All images are strictly for personal and family use only and must not be placed in the public domain. This includes publication on the internet: for example, on sites such as YouTube and on social networking sites such as Facebook unless in access restricted areas. Any parent or pupil who is concerned about images that have been uploaded into a public domain should seek the cooperation of the person who uploaded the item, or make use of the website's facility to flag inappropriate content; if this fails to resolve the matter, the School should be informed.
- Photographs and recordings during services in Chapel are not permitted. However, the Marketing Team may record certain services for archival and promotional purposes.
- Recording of concerts by parents is not allowed. However, the Music and Drama departments will record certain performances for archive purposes and a copy of these will be available to parents on request.
- The rights of individuals must be respected and child protection ensured at all times.
- Parents must be mindful of the need to use their cameras and recording devices with consideration and courtesy for others.
- Flash photography can disturb others in the audience or cause distress for those with medical conditions, and should therefore not be used.
- Commercial copyright issues may prevent the School from permitting the filming or recording of certain events such as plays and concerts. If that is the case, the audience will be informed that there must be no infringement of copyright.
- The School reserves the right to upload recordings and photographs into the public domain for promotional purposes.
- Parents are asked to refer to the School's Terms and Conditions which gives consent to the School to obtain and use photographs and/or images of pupils for promotional, press and educational purposes

#### ***Parental Photography Recording Consent:***

*Repton Prep School takes a proactive approach to its marketing activity. We would like to take this opportunity to inform you that photographs and video recordings of our pupils are taken regularly. They can be used on our social media (Instagram, Facebook, Twitter and YouTube), our website and in school magazines. We find this an important part of showing school life at Repton Prep School.*

*I (parent/guardian) authorise Repton Prep School to take photographic images or recordings of my child at school or on school outings and to hold such images or recordings on hard drives or other media for the use of editing and printing purposes.*

## **Appendix 14**

### **Use of MS Teams for groups of pupils and individual pupils**

It is acknowledged that teachers will use live video/audio conferencing through MS Teams to groups of pupils, and sometimes to individual pupils, within the school day.

In all cases appropriate safeguarding measures must be taken by staff, mindful of the *Repton Prep School Child Protection and Safeguarding Children Policy* and the *Staff Code of Conduct*.

#### **Platforms to be used by Staff and Pupils:**

1. Beyond using Repton Prep School e-mail accounts, staff must only use MS Teams – which includes the video and audio conferencing functions and the chat function – **and NOT alternatives such as Skype, Facetime, Zoom, etc.**
2. There may be occasional exceptions where an alternative to MS Teams might need to be used by an external individual/organisation. In all such cases a request should be made to the Designated Safeguarding Lead (SAE) and Head of ICT (SRO), and permission granted before going ahead with the use of an alternative to MS Teams, such as Zoom.

#### **General expectations:**

1. In line with the Staff Code of Conduct and Child Protection and safeguarding Policy, normal professional standards apply.
2. All involved in video conferencing (staff and pupils) must be wearing suitable clothing.
3. The language and actions used by all concerned must be professional and appropriate at all times.
4. All video conferencing must take place in an appropriate location – certainly not in bedrooms – and, as much as is possible, against a neutral background. Staff and pupils should consider the use of the ‘blur background’ feature in MS Teams.
5. Staff and pupils must ensure that family members (and most especially children) are not visible.
6. From a safeguarding perspective staff are not expected to record group / individual meetings on MS Teams, but in some circumstances it might be appropriate to do so as an additional safeguarding measure or for academic purposes (e.g. for subsequent pupil reference to check understanding/consolidate learning, or if a pupil has missed a lesson). If a member of staff is recording an MS Teams meeting then the member of staff should make this clear to the pupil(s) concerned.
7. In line with Repton Prep School’s safeguarding culture of self-reporting, any safeguarding concerns within any form of video conferencing should be raised immediately with the DSL (SAE) and technical concerns to SRO.

### **MS Teams - One-to-one meetings with pupils:**

- Staff should recognise that there are additional safeguarding implications when arranging a meeting with a pupil on a one-to-one basis.
- One-to-one meetings should be pre-arranged in MS Teams using the “schedule a meeting” function, whereby ensuring that the meeting is added to the Teams Calendar.
- When creating a one-to-one meeting, an additional member of staff (preferably HoD/House Parents/DSL or Deputy DSL) should be added to the meeting. This member of staff does not need to be present for the entire meeting but having the ability to drop-in – just as they might a classroom – is an important additional safeguarding measure.
- It is good practice for staff organising a regular one-to-one meeting via MS Teams to inform the Head of Year/House parent and parent.
- If a member of staff is not happy with any aspect of a pupil’s approach to the meeting then the member of staff can turn off the video function OR bring the meeting to an end and report concerns through to the DSL / HoD/ House Parent.

## **Appendix 15**

### **Telephone calls to parents:**

1. Staff must not use their own home and/or personal mobile phone numbers.
2. Staff whose numbers are already published to parents (e.g. boarding houses) can use these numbers to speak to parents.
3. In all other cases e-mail / a Teams based audio conversation should be the chosen mode of communication with parents.
4. If a parent really does need to speak to a member of staff over the telephone, then this can be arranged by e-mail and the relevant member of staff can use a school telephone number, in an office on the school site, for a call at a mutually convenient time.
5. Alternatively, having checked with the network provider, a member of staff could look to 'block' their personal home or mobile number to maintain privacy.
6. It is worth noting that parents can make initial contact by telephone through 01283 707100

### **Telephone calls to pupils:**

1. In general terms, staff must not make telephone calls to students.
2. Communication with pupils should be through School e-mail, MS Teams or in person.
3. It is recognised that there will be circumstances – such as on a school trip or following the *Missing Pupil Protocol* - where telephone communication might be necessary using a Repton Prep School landline phone or a Repton Prep School mobile phone.



## **Appendix 16**

### **Monitoring and evaluation of this policy**

The School monitors and evaluates its Child Protection Policy and procedures through the following activities:

- Governors visiting the School and talking to children and staff
- reporting of incidents and issues at Governing Body meetings
- Governing Body consideration of a formal report annually, including approval of this Child Protection Policy
- Termly meetings with the Pastoral Team and Safeguarding Governor where past incidents will be reviewed, not only to ensure that procedures were correctly followed but that lessons are learned to enhance future practice
- members of the SMT having discussions with children and staff
- regular discussion of issues at SMT meetings; discussion of the full range of pastoral issues at weekly Houseparents' meetings
- via the 'alert' system on the IT network (Securely)
- the Deputy Head Pastoral & Boarding regularly reviews records (both day and boarding) regarding behaviour, discipline and sanctions, and maintains a bullying log
- regular review of parental complaints and concerns by the Headteacher / Deputy Heads
- close liaison between the Health and Wellbeing Centre staff, the School Doctors, and the Deputy Head Pastoral & Boarding
- discussion at Head of Year meetings, led by the Deputy DSL
- close liaison with Derby & Derbyshire Safeguarding Children Partnership and Derbyshire Children's Social Care

The DSL will ensure that the procedures set out in this Policy and the implementation of the procedures are updated and reviewed regularly, working with staff and the Governors as necessary.

## **Appendix 17**

### **EYFS Safeguarding children & child protection policy.**

EYFS: 3.4-3.18, 3.19, 3.21,3.22
------------------------------------

In our EYFS we work with children, parents, external agencies and the community to ensure the welfare and safety of children and to give them the very best start in life. Children have the right to be treated with respect, be helped to thrive and to be safe from any abuse in whatever form.

We support the children within our care, protect them from maltreatment and have robust procedures in place to prevent the impairment of children's health and development. Safeguarding is a much wider subject than the elements covered within this single policy, therefore this document should be used in conjunction with the EYFS other policies and procedures.

## **Legal framework and definition of safeguarding**

Safeguarding Vulnerable Groups Act 2006

The Statutory Framework for the Early Years Foundation Stage (EYFS) 2024

Working together to safeguard children 2023

Childcare Act 2006

Children Act 2004

Safeguarding and promoting the welfare of children, in relation to this policy is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, wherever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.



(Definition taken from the HM Government document 'Working together to safeguard children 2023').

## Key Staff

### The Designated Safeguarding Leads (DSL's) for the EYFS are

Stuart Elks (Deputy Head Pastoral & Boarding), Kellee Cavill (Deputy Head Pre-Prep) and Alice Chapman (DDSL – EYFS)

[selks@repton.org.uk](mailto:selks@repton.org.uk)

[kcavill@repton.org.uk](mailto:kcavill@repton.org.uk)

[achapman@repton.org.uk](mailto:achapman@repton.org.uk)

**The Head of Early Years is:** Helen Ewins

[hewins@repton.org.uk](mailto:hewins@repton.org.uk)

## Policy Intention

To safeguard children and promote their welfare we will:

- Create an environment to encourage children to develop a positive self-image
- Provide positive role models
- Encourage children to develop a sense of independence and autonomy in a way that is appropriate to their age and stage of development
- Provide a safe and secure environment for all children
- Always listen to children
- Provide an environment where practitioners are confident to identify where children and families may need intervention and seek the help they need
- Share information with other agencies as appropriate.

The EYFS is aware that abuse does occur in our society and we are vigilant in identifying signs of abuse and reporting concerns. Our practitioners have a duty to protect and promote the welfare of children. Due to the many hours of care we are providing, staff may often be the first people to identify that there may be a problem. They may well be the first people in whom children confide information that may suggest abuse or to spot changes in a child's behaviour which may indicate abuse.

Our prime responsibility is the welfare and well-being of each child in our care. As such we believe we have a duty to the children, parents and staff to act quickly and responsibly in any instance that may come to our attention. This includes sharing information with any relevant agencies such as local authority services for children's social care, health professionals or the police. All staff will work

with other agencies including as part of a multi-agency team, where needed, in the best interests of the child.

The EYFS aims to:

- Keep the child at the centre of all we do
- Ensure staff are trained to understand the safeguarding policy and procedures, are alert to identify possible signs of abuse, understand what is meant by child protection and are aware of the different ways in which children can be harmed, including by other children through bullying or discriminatory behaviour
- Ensure that all staff feel confident and supported to act in the best interest of the child share information and seek the help that the child may need
- Ensure that all staff are familiar and updated regularly with child protection training and procedures and kept informed of changes to local/national procedures
- Make any referrals in a timely way, sharing relevant information as necessary in line with procedures set out by the South Derbyshire Safeguarding Children Board
- Ensure that information is shared only with those people who need to know in order to protect the child and act in their best interest
- Ensure that children are never placed at risk while in the charge of EYFS staff
- Take any appropriate action relating to allegations of serious harm or abuse against any person working with children, or living or working on the EYFS premises including reporting such allegations to Ofsted and other relevant authorities
- Regularly review and update this policy with staff and parents where appropriate and make sure it complies with any legal requirements and any guidance or procedures issued by South Derbyshire Safeguarding Children Board.

We will support children by offering reassurance, comfort and sensitive interactions. We will devise activities according to individual circumstances to enable children to develop confidence and self-esteem within their peer group.

## **Indicators of child abuse**

- Failure to thrive and meet developmental milestones
- Fearful or withdrawn tendencies
- Aggressive behaviour
- Unexplained injuries to a child or conflicting reports from parents or staff
- Repeated injuries
- Unaddressed illnesses or injuries.

## **Recording suspicions of abuse and disclosures**

Staff should make an objective record of any observation or disclosure, supported by the Head of Early Years or Designated Safeguarding Leads (DSL's). This record should include:

- Child's name

- Child's address
- Age of the child and date of birth
- Date and time of the observation or the disclosure
- Exact words spoken by the child
- Exact position and type of any injuries or marks seen
- Exact observation of any incident including any other witnesses
- Name of the person to whom any concern was reported, with date and time; and the names of any other person present at the time
- Any discussion held with the parent(s) (where deemed appropriate).
- The above will be recorded on the Wellbeing section of iSAMS.

These records should be signed by the person reporting this and the manager, dated and kept in a separate confidential file in the Safeguarding filing cabinet, which is kept locked and in a locked room.

If a child starts to talk to an adult about potential abuse it is important not to promise the child complete confidentiality. This promise cannot be kept. It is vital that the child is allowed to talk openly and disclosure is not forced or words put into the child's mouth. As soon as possible after the disclosure details must be logged accurately.

It may be thought necessary that through discussion with all concerned the matter needs to be raised with the local authority children's social care team and Ofsted, and/or a Common Assessment Framework (CAF) needs to be initiated. Staff involved may be asked to supply details of any information/concerns they have with regard to a child. The EYFS expects all members of staff to co-operate with the local authority children's social care, police, and Ofsted in any way necessary to ensure the safety of the children.

Staff must not make any comments either publicly or in private about a parent's or staff's supposed or actual behaviour.

## Physical abuse

Action needs to be taken if staff have reason to believe that there has been a physical injury to a child, including deliberate poisoning, where there is definite knowledge, or reasonable suspicion that the injury was inflicted or knowingly not prevented. These symptoms may include bruising or injuries in an area that is not usual for a child, e.g. fleshy parts of the arms and legs, back, wrists, ankles and face.

Many children will have cuts, bumps and grazes from normal childhood injuries. These should also be logged and discussed with the Head of Early Years. Parents/guardians are asked to report any pre-existing bumps and bruises. These are logged, dated and a signature required by the parents/guardians. If any bumps and bruises are identified by Early Years staff these are also logged, dated and signed by the appropriate staff member.

Children and babies may be abused physically through shaking or throwing. Other injuries may include burns or scalds. These are not usual childhood injuries and should always be logged and discussed with the Head of Early Years.

## **Female genital mutilation**

This type of physical abuse is practised as a cultural ritual by certain ethnic groups and there is now more awareness of its prevalence in some communities in England including its effect on the child and any other siblings involved. For those nurseries caring for older children in their out of school facility this may be an area of abuse you could come across. Symptoms may include bleeding, painful areas, and acute urinary retention, urinary infection, wound infection, septicaemia, and incontinence, vaginal and pelvic infections with depression and posttraumatic stress disorder as physiological concerns. If you have concerns about a child in this area, you should contact children's social care team in the same way as other types of physical abuse.

## **Fabricated illness**

This is also a type of physical abuse. This is where a child is presented with an illness that is fabricated by the adult carer. The carer may seek out unnecessary medical treatment or investigation. The signs may include a carer exaggerating a real illness or symptoms, complete fabrication of symptoms or inducing physical illness, e.g. through poisoning, starvation, inappropriate diet. This may also be presented through false allegations of abuse or encouraging the child to appear disabled or ill to obtain unnecessary treatment or specialist support.

### **Procedure:**

- All signs of marks/injuries to a child, when they come into EYFS or occur during time at the EYFS, will be recorded as soon as noticed by a staff member
- The incident will be discussed with the parent at the earliest opportunity, where felt appropriate
- Such discussions will be recorded and the parent will have access to such records
- If there appear to be any queries regarding the injury, the local authority children's social care team will be notified in line with procedures set out by the Local Safeguarding Children Board (LSCB).

## **Sexual abuse**

Action needs to be taken under this heading if the staff member has witnessed occasion(s) where a child indicated sexual activity through words, play, drawing, had an excessive pre-occupation with sexual matters, or had an inappropriate knowledge of adult sexual behaviour or language. This may include acting out sexual activity on dolls/toys or in the role play area with their peers, drawing

pictures that are inappropriate for a child, talking about sexual activities or using sexual language or words. The child may become worried when their clothes are removed, e.g. for nappy changes.

The physical symptoms may include genital trauma, discharge, and bruises between the legs or signs of a sexually transmitted disease (STD). Emotional symptoms could include a distinct change in a child's behaviour. They may be withdrawn or overly extroverted and outgoing. They may withdraw away from a particular adult and become distressed if they reach out for them, but they may also be particularly clingy to a potential abuser so all symptoms and signs should be looked at together and assessed as a whole.

If a child starts to talk openly to an adult about abuse they may be experiencing; the procedure stated later in this document under 'recording abuse suspicions' will be followed.

### **Procedure:**

- The adult should reassure the child and listen without interrupting if the child wishes to talk
- The observed instances will be detailed in a confidential report
- The observed instances will be reported to the Head of Early Years and the DSL/Deputy DSL
- The matter will be referred to the local authority children's social care team
- A sensitive and confidential discussion will be held with the parents/carers of any other children party to inappropriate play.

## **Emotional abuse**

Action should be taken under this heading if the staff member has reason to believe that there is a severe, adverse effect on the behaviour and emotional development of a child, caused by persistent or severe ill treatment or rejection.

This may include extremes of discipline where a child is shouted at or put down on a consistent basis, lack of emotional attachment by a parent, or it may include parents or carers placing inappropriate age or developmental expectations upon them. Emotional abuse may also be imposed through the child witnessing domestic abuse and alcohol and drug misuse by adults caring for them.

The child is likely to show extremes of emotion with this type of abuse. This may include shying away from an adult who is abusing them, becoming withdrawn, aggressive or clingy in order to receive their love and attention. This type of abuse is harder to identify as the child is not likely to show any physical signs.

### **Procedure:**

- The concern should be discussed with the Head of Early Years
- The concern will be discussed with the parent
- Such discussions will be recorded and the parent will have access to such records
- A Common Assessment Framework (CAF) form may need to be completed

- If there appear to be any queries regarding the circumstances, the matter will be referred to the local authority children's social care team.

## Neglect

Action should be taken under this heading if the staff member has reason to believe that there has been persistent or severe neglect of a child (for example, by exposure to any kind of danger, including cold, starvation or failure to seek medical treatment when required on behalf of the child), which results in serious impairment of the child's health or development, including failure to thrive.

Signs may include a child persistently arriving at EYFS unwashed or unkempt, wearing clothes that are too small (especially shoes that may restrict the child's growth or hurt them), arriving at EYFS in the same nappy they went home in or a child having an illness that is not being addressed by the parent. A child may also be persistently hungry if a parent is withholding food or not providing enough for a child's needs.

Neglect may also be shown through emotional signs, e.g. a child may not be receiving the attention they need at home and may crave love and support at EYFS. They may be clingy and emotional. In addition, neglect may occur through pregnancy as a result of maternal substance abuse.

### Procedure:

- The concern will be discussed with the parent
- Such discussions will be recorded and the parent will have access to such records
- A CAF form may need to be completed
- If there appear to be any queries regarding the circumstances the local authority children's social care team will be notified.

## Staffing and volunteering

Our policy is to provide a secure and safe environment for all children. We only allow an adult who is employed by Repton Prep School or approved external providers to care for children and who has an enhanced clearance from the Disclosure and Barring Service (DBS) to be left alone with children. We do not allow volunteers to be alone with children or any other adult who may be present in the EYFS regardless of whether or not they have a DBS clearance.

All permanent staff will attend child protection training and receive initial basic child protection training during their induction period. This will include the procedures for spotting signs and behaviours of abuse and abusers/potential abusers, recording and reporting concerns and creating a safe and secure environment for the children in the EYFS. During induction staff will be given contact details for the LADO (local authority designated officer), the local authority children's services

team, the Local Safeguarding Children Board (LSCB) and Ofsted to enable them to report any safeguarding concerns, independently, if they feel it necessary to do so.

We have a named person within the EYFS who takes lead responsibility for safeguarding and co-ordinates child protection and welfare issues, known as the Designated Safeguarding Coordinator (DSCO), (K Cavill – Deputy DSL). The School DSL's Liaise with the Local Safeguarding Children Board (LSCB) and the local authority children's social care team, undertakes specific training, including a child protection training course, and receives regular updates to developments within this field.

- We provide adequate and appropriate staffing resources to meet the needs of all children
- Applicants for posts within the EYFS are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974. Candidates are informed of the need to carry out checks before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information
- We give staff members/volunteers and students regular opportunities to declare changes that may affect their suitability to care for the children. This includes information about their health, medication or about changes in their home life such as whether anyone they live with in a household has committed an offence or been involved in an incident that means they are disqualified from working with children.
- This information is also stated within every member of staff's contract
- We abide by the requirements of the EYFS and any Ofsted guidance in respect to obtaining references and suitability checks for staff, students and volunteers, to ensure that all staff, students and volunteers working in the setting are suitable to do so
- We ensure we receive at least two written references BEFORE a new member of staff commences employment with us
- All shortlisted candidates will be informed that the school might conduct an online search as part of due diligence checks in the recruitment process.
- All students will have enhanced DBS checks conducted on them before their placement starts
- Volunteers, including students, do not work unsupervised
- We abide by the requirements of the Safeguarding Vulnerable Groups Act (2006) and the Childcare Act 2006 in respect of any person who is disqualified from providing childcare, is dismissed from our employment, or resigns in circumstances that would otherwise have led to dismissal for reasons of child protection concern
- We have procedures for recording the details of visitors to the EYFS and take security steps to ensure that we have control over who comes into the EYFS, so that no unauthorised person has unsupervised access to the children
- All visitors/contractors will be supervised whilst on the premises, especially when in the areas the children use
- All staff have access to and comply with the whistleblowing policy which will enable them to share any concerns that may arise about their colleagues in an appropriate manner
- All staff will receive regular supervision meetings where opportunities will be made available to discuss any issues relating to individual children, child protection training and any needs for further support
- The deployment of staff within the EYFS allows for constant supervision and support. Where children need to spend time away from the rest of the group, the door will be left ajar or other safeguards will be put into action to ensure the safety of the child and the adult.



- As part of their safeguarding and online safety training all staff need to understand their expectations, roles and responsibilities around filtering and monitoring.
- All staff must understand that some children are of greater risk of harm than others, both online and offline.

## **Informing parents**

Parents are normally the first point of contact. If a suspicion of abuse is recorded, parents are informed at the same time as the report is made, except where the guidance of the LSCB/ local authority children's social care team/Police does not allow this. This will usually be the case where the parent or family member is the likely abuser, or where a child may be endangered by this disclosure. In these cases, the investigating officers will inform parents.

## **Confidentiality**

All suspicions, enquiries and external investigations are kept confidential and shared only with those who need to know. Any information is shared in line with guidance from the LSCB.

## **Support to families**

The EYFS takes every step in its power to build up trusting and supportive relations among families, staff, students and volunteers within the EYFS.

The EYFS continues to welcome the child and the family whilst enquiries are being made in relation to abuse in the home situation. Parents and families will be treated with respect in a non-judgmental manner whilst any external investigations are carried out in the best interests of the child.

Confidential records kept on a child are shared with the child's parents or those who have parental responsibility for the child, only if appropriate in line with guidance of the LSCB with the proviso that the care and safety of the child is paramount. We will do all in our power to support and work with the child's family.

## **Employees, students or volunteers of the EYFS or any other person living or working on the EYFS premises**

If an allegation is made against a member of staff, student or volunteer or any other person who lives or works on the EYFS premises regardless of whether the allegation relates to the EYFS premises or elsewhere, we will follow the procedure below.



The allegation should be reported to the senior manager on duty. If this person is the subject of the allegation then this should be reported to the Headteacher or Safeguarding Governor instead.

The Local Authority Designated Officer (LADO), Ofsted and the LSCB will then be informed immediately in order for this to be investigated by the appropriate bodies promptly:

- The LADO will be informed immediately for advice and guidance
- A full investigation will be carried out by the appropriate professionals (LADO, Ofsted, LSCB) to determine how this will be handled
- The EYFS will follow all instructions from the LADO, Ofsted, LSCB and ask all staff members to do the same and co-operate where required
- Support will be provided to all those involved in an allegation throughout the external investigation in line with LADO support and advice
- The EYFS reserves the right to suspend any member of staff during an investigation
- All enquiries/external investigations/interviews will be documented and kept in a locked file for access by the relevant authorities
- Unfounded allegations will result in all rights being re-instated
- Founded allegations will be passed on to the relevant organisations including the local authority children's social care team and where an offence is believed to have been committed, the police, and will result in the termination of employment. Ofsted will be notified immediately of this decision. The EYFS will also notify the Disclosure and Barring Service (DBS) to ensure their records are updated
- All records will be kept until the person reaches normal retirement age or for 10 years if that is longer. This will ensure accurate information is available for references and future DBS checks and avoids any unnecessary re-investigation
- The EYFS retains the right to dismiss any member of staff in connection with founded allegations following an inquiry
- Counselling will be available for any member of the EYFS who is affected by an allegation, their colleagues in the EYFS and the parents.

## **Restrictions for the use of mobile phones and cameras**

- All Staff are permitted to take and store images of children on school devices. No member of staff should take or store images of pupils on their own devices. School issued devices (phones and iPads) are available for this purpose, alongside school cameras.
- Staff must not at any time take images of children that may be considered indecent (eg; in the swimming pool).
- Images should not be made during one-to-one situations.
- Photos must be taken for the sole purpose of marketing the school, on the School's social media accounts (unless the child is non-publicity), sending directly to parents, or for use within school, such as displays or to evidence learning.
- Full names will not be used when images are used by the school.
- Staff must not post images of children on their own social media accounts.
- Children should be told of the reason a photo is being taken.
- Images must not be taken secretly.

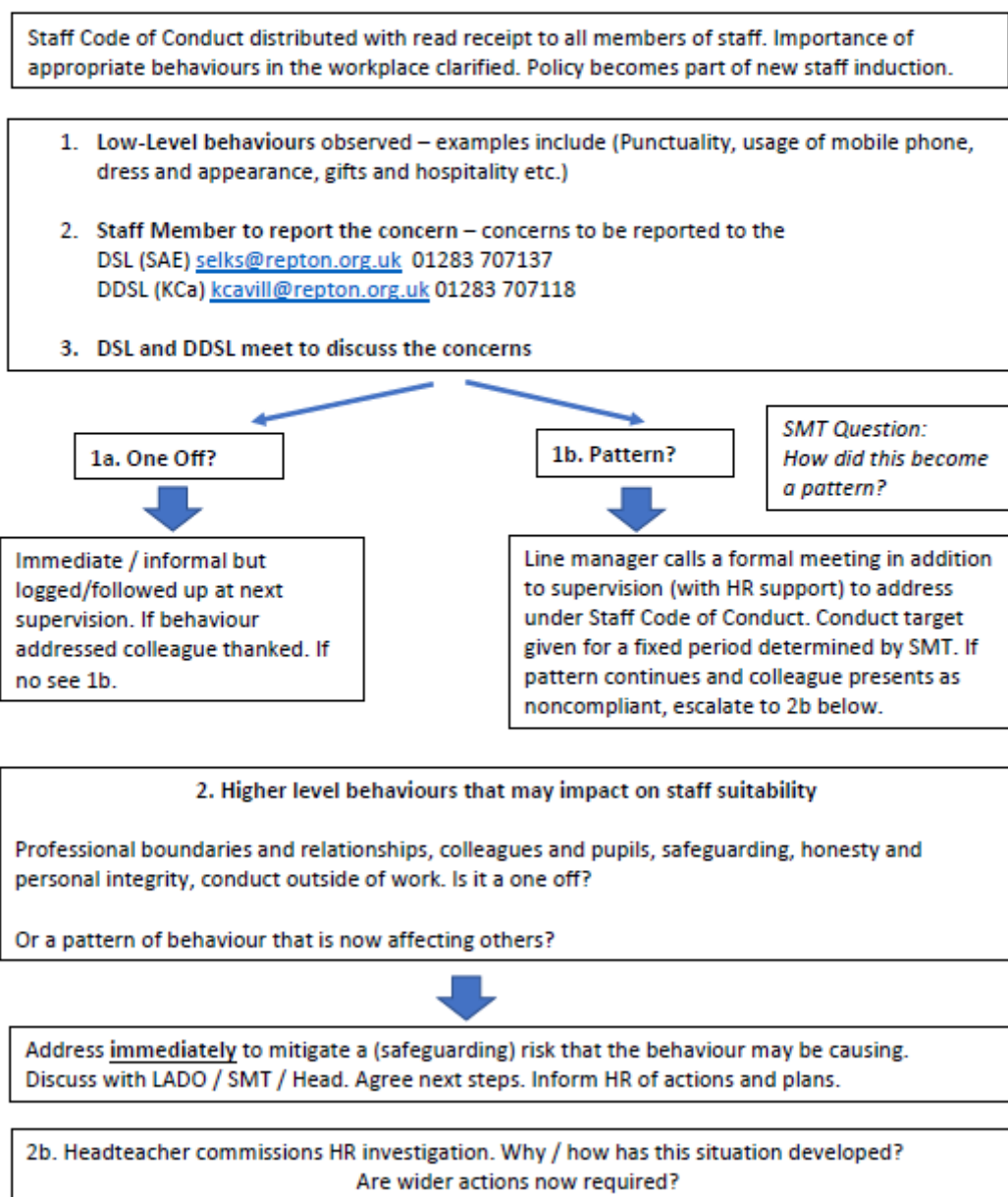
Our EYFS has a clear commitment to protecting children and promoting welfare. Should anyone believe that this policy is not being upheld, it is their duty to report the matter to the attention of the Head of Early Years at the earliest opportunity.

## Appendix 18

### Low Level Concerns Flowchart



#### Low-Level Concerns Flowchart



## Appendix 19

### Safeguarding Flowchart

