REPTON

Safeguarding Children and Child Protection Policy & Guidance

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Safeguarding Children and Child Protection Policy & Guidance

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Child Protection & Safeguarding - Key Points for Staff (2026)

Safeguarding and promoting the welfare of children is **everyone's responsibility all of the time.** The safety and welfare of our pupils is our highest priority.

All staff (including governors, supply staff, trainee teachers, contractors and volunteers) are under a general legal duty of care to safeguard children. Be aware that safeguarding concerns can arise both inside and outside school, including online.

Be alert to signs of abuse, neglect, exploitation, mental health concerns, online harms, child-on-child abuse, radicalisation, the Prevent duty and children missing education. Support Early / Family Help, and timely intervention where pupils may need additional support.

Maintain a child-centred approach and take all concerns seriously. Always act in the best interests of the child. Children includes **everyone** under the age of 18.

Report concerns immediately to Sally Lees who is the Designated Safeguarding Lead (DSL) or a Deputy DSL. Do not assume someone else will report. Professional curiosity and timely reporting are essential for effective safeguarding practice and culture.

In an emergency or where a child is at immediate risk of harm, contact emergency services (999) and inform the DSL (or a Deputy DSL) by phone call as soon as possible.

Never promise confidentiality to a pupil. Explain that concerns must be shared with the safeguarding team to keep them safe and that their privacy will be respected.

Listen, reassure, and record. Do not investigate or ask leading questions. Make accurate written records including dates, times, facts, and actions taken. Use CPOMS as the school's reporting system and follow procedures.

Challenge and report poor or unsafe safeguarding practice. Follow the Low-level concerns policy on Page 83 if you have a concern about any adult working with children or to self-report something that you are worried about.

If an allegation is made about another member of staff (including supply staff, trainee teachers, contractors, volunteers, and visitors) harming or posing a risk of harm to children, speak to the Headmaster.

Follow the behaviour expectations and values as set out in the Staff Code of Conduct. All staff must wear their lanyard at all times on the school site.

Attend all required safeguarding training and keep up to date with reading school policies, guidance and statutory requirements.

Remember: if in doubt, speak to the DSL, Sally Lees, without delay. If the DSL is not available, contact a Deputy DSL or member of the SMT, or an external agency. Repton's named Safeguarding Governor is Sally Wan.

1. Key Contacts

1.1. Internal (Repton and Repton Prep).

Designated Safeguarding Lead (DSL), and Deputy Head Safeguarding, Repton School – Mrs Sally Lees	SLees@repton.org.uk / 01283 559261 Internal extension number: 425
Safeguarding Compliance Officer	safeguarding@repton.org.uk / 01283 559391
Deputy Head Pupil Wellbeing and Pastoral and Deputy DSL, – Mrs Anna Parish	AParish@repton.org.uk / 01283 559219 Internal extension number: 413
Principal Deputy Head and Deputy DSL, Repton School – Dr Gavin Turner	GTurner@repton.org.uk / 01283 559370
Deputy Head Operations and Behaviour and Deputy DSL – Mrs Caoimhe Pettingell	CPettingell@repton.org.uk / 01283 559420
Headmaster, Repton School – Mr Mark Semmence	headmaster@repton.org.uk / 01283 559221
DSL, Repton Prep – Mr Stuart Elks	SElks@repton.org.uk / 01283 707111
Head, Repton Prep – Mrs Vicky Harding	prephead@repton.org.uk / 01283 707100
Chair of the Governors, Mr Mark Shires	*Contact without divulging any details is available via the Clerk to the Governors, calling 01283 559272 or using Clerk@repton.org.uk*
Safeguarding Governor – Ms Sally Wan	*Contact without divulging any details is available via the Clerk to the Governors, calling 01283 559272 or email swan@repton.org.uk*
Independent Person – Rev'd Steve Short	07801 357612

1.2. External

Derbyshire Children's Services	
Starting Point – Contact and Referral Service for Derbyshire	Starting Point contact and referral service - Derbyshire County Council If you're a practitioner seeking advice ahead of making a referral you can contact a social worker, telephone: **01629 535353**.
Call Derbyshire (Child is suffering or at risk of significant harm)	All calls regarding an issue of child protection should be called through to Call Derbyshire on telephone: **01629 533190**.
Derby and Derbyshire Safeguarding Children Partnership (DDSCP)	About the DDSCP ddscp@derby.gov.uk
Local Authority Designated Officer (LADO) – for allegations against staff	01629 531940 Professional.Allegations@derbyshire.gov.uk
The Police	
Police (non emergencies) / Police emergencies	101 / 999 Central Referral Unit: Butterley Hall, Ripley Derbyshire DE5 3RS 0300 122 8719
CEOP (Child Exploitation and Online Protection) to report issues online	https:www.ceop.police.uk/
Extremism and Radicalisation	
PREVENT Derbyshire Constabulary	Prevent | Derbyshire Constabulary 0300 122 8694
National Police Prevent Advice Line	0800 011 3764
Prevent Engagement Officer – Derbyshire County Council	Joie Cain Joie.cain@derbyshire.gov.uk 01629 532255 07866 912867
PREVENT Regional Coordinator East Midlands providing advice for schools and childminders	sam.slack@education.gov.uk
Safer Derbyshire – Prevent Referrals	Prevent referrals
Anti-terrorism helpline	0800 789321
Other	
NSPCC Inform	0808 800 5000 / help@nspcc.org.uk / www.nspcc.org.uk/Inform
NSPCC Whistleblowing Helpline	0800 0280285 / help@nspcc.org.uk

2. Statement of Intent – Aims and Objectives of this Policy

2.1. Aims and Objectives

- This Repton policy relates to Repton 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 favorably than others in being able to access services that meet their particular needs.
- 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.
- The age range of pupils is 12-19. For all practical purposes, a 12 year old pupil would be treated as Yr 9 (B Block). However, were the age to be significant in a particular instance, the response would be adapted accordingly.
- In all matters relating to Safeguarding and Child Protection, Repton will follow the procedures laid down by the Derby & Derbyshire Safeguarding Children Partnership (DDSCP), together with the Statutory Guidance contained in Working Together to Safeguard Children (WTSC, 2026) and Keeping Children Safe in Education (KCSiE, 2026).
- This policy is applicable to the whole school community of Repton School, 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. This is emphasized in our safeguarding training and staff must be sensitive to the needs of boarders in particular.
- At Repton, in line with KCSiE 2026 and WTSC 2026, a child centered approach is fundamental to safeguarding and promoting the welfare of every child.
- 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 familiarize themselves and always comply 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 all of the time. **Everyone** – teaching and non-teaching staff,visitors and volunteers- 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.

- A copy of this policy, together with other relevant policies, is on the Repton School website: Repton School: Policies | Repton School We hope that parents and guardians will always feel able to take up any issues or worries that they may have with 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.

- This policy applies at all times even when pupils or staff are away from Repton School and including out of hours activities. The Policy applies to all staff (teaching and non-teaching), supply teachers, trainee teachers, contractors, volunteers and governors.

Safeguarding is not just about protecting children from deliberate harm, neglect, exploitation, or failure to act, it relates to broader aspects of care and education. This policy therefore complements and supports a range of other school policies, such as:

- Children's health and safety and well-being, including their mental health
- Behaviour policy, including how we engage learners struggling to engage in school, mental health and behaviour, acceptable and non-acceptable behaviours, how we prevent and respond to bullying including cyber bullying, prejudiced based and discriminatory bullying and child-on-child abuse. This policy also outlines the school/college's screening, searching, and confiscating powers and how they will be used safely, proportionately, and appropriately, including police strip searches
- Acceptable use of IT agreements
- Use of restrictive intervention, including use of reasonable force and the increased vulnerability of children with special education needs and/or disabilities (SEND) and equality duties
- School attendance, including unexplainable and/or persistent absences from education, not in receipt of full-time education or go missing from education, home, or care
- Suspension and permanent exclusion
- Meeting the needs of learners with medical conditions
- Support children in school with allergies
- Providing first aid
- Educational visits
- Intimate care

- Emotional well-being
- Online safety, including use of mobile and smart technology, AI, online safety at school and at home and other associated issues, including making or sharing nudes and semi-nudes, appropriate filtering and monitoring, and how children can be kept safe from terrorist and extremist materials
- School mobile phone policy
- Safer recruitment and selection, including single central record
- Staff code of conduct, including low level concerns, managing allegations against staff, including supply staff, contractors and volunteers incorporating 'duty to refer' and whistleblowing, acceptable use of smart technologies/mobile devices, staff/learner relationships and communications, including the use of social media
- School security and visitors
- Policy/agreement for visiting speakers
- SEND annual information report
- Relationships education (RE)/relationships and sex education (RSE) and health education (physical and mental well-being)
- Communications
- Complaints procedure
- Data protection policies and privacy notices, including record keeping and retention
- Information sharing

3. Statutory Guidance to be used in conjunction with this policy

3.1. Keeping Children Safe in Education (2026) Keeping children safe in education 2026 (comes into force from 1 September 2026) 2026 The "Keeping Children Safe in Education" (KCSIE) 2026 guidance outlines essential updates and responsibilities for schools in England to enhance child safety and welfare.

3.2. Working Together to Safeguard Children (2026) https://assets.publishing.service.gov.uk/media/69b92ff0f6acd3f43e961211/Working_together_to_safeguard_children_statutory_framework.pdf Sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm. In addition, it sets out the statutory roles and responsibilities of schools.

3.3. Furthermore, we will follow the advice and procedures set out by the *DDSCP (Derby & Derbyshire Safeguarding Children Partnership):* Policies and Procedures (ddscp.org.uk)

3.4. *The Teacher Standards (2012)* which state that teachers, (including head teachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

3.5. *Working Together to Improve School Attendance (2024)* is statutory guidance issued by the Department for Education which applies to all schools to maintain high levels of school attendance.

3.6. *Education (Independent School Standards) Regulations (2014)* is a set of regulations established by the Department for Education.

3.7. *Boarding Schools; National Minimum Standards (2022)* are guidelines set to ensure the welfare, safety and quality of life for pupils living in boarding schools. National Minimum Standards for boarding schools

3.8 From 1st September 2026, this guidance is statutory related to use of mobile phones in schools. Mobile phones in schools - GOV.UK

In KCSIE, the term 'data protection laws' refers collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

4. Definitions of key terms

4.1. ***Safeguarding*** and promoting the welfare of children is defined in KCSiE 2026 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 or 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.

4.2. Children includes everyone under the age of 18.

4.3. *Child Protection* refers to the situation where there is a risk that a child is suffering or is likely to suffer significant harm, and action is taken to protect the child.

4.4. *Designated Safeguarding Lead (DSL)* is a senior member of staff from the leadership team who has lead responsibility for safeguarding and child protection (including online safety).

4.5. *Child/Children* refers to everyone under the age of 18 years. This policy also covers any pupil over the age of 18 that is on the Repton School roll.

5. Roles and Responsibilities

5.1. All Staff (including governors, supply staff, trainee teachers, contractors and volunteers)

Safeguarding and child protection is **everyone's responsibility, all of the time**. All staff (including governors, supply staff, trainee teachers, 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 (2 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 and neglect and of emergent mental health problems;
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures, 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 children's services and any other agencies following any referral.
- challenge and report any poor or unsafe safeguarding practice to the DSL, senior leadership, or external agencies if necessary.
- Use the school's reporting systems (including online systems) CPOMS, Self reporting
- be aware of risks to children online and support the school's approach to online safety.

5.2. Senior Pupils

Senior pupils need to be aware of the need to report allegations or suspicions of child abuse to the DSL. Children often tell other young people, rather than staff or adults, about abuse. U6th pupils who hold a position of responsibility such as School and House Prefects receive safeguarding training and guidance. Mental health issues are regularly discussed within the School and an open dialogue is encouraged and practised.

5.3. The Designated Safeguarding Lead and Safeguarding Team

The Deputy Head (Safeguarding), Mrs Sally Lees, is the Designated Safeguarding Lead (DSL). She has been fully trained for the demands of this role in Child Protection and Inter-agency working. She is a member of the Senior Management Team (SMT). SLees@repton.org.uk

The Safeguarding Compliance Officer (SCO) is a Deputy DSL and reports directly to the DSL, deputises as necessary, supporting the co-ordination and management of all safeguarding and child protection matters arising. safeguarding@repton.org.uk

The Deputy Head (Pupil Wellbeing and Pastoral) – Mrs Anna Parish - is a Deputy DSL and a member of the SMT. She has received the same Derbyshire-led training as the DSL. AParish@repton.org.uk

5.3.1. **Deputy DSLs and members of SMT to provide DSL cover and support:**

- Anna Parish – AParish@repton.org.uk
- Gavin Turner – GTurner@repton.org.uk
- Sarah Greig – SGreig@repton.org.uk
- Caoimhe Pettingell – CPettingell@repton.org.uk
- Tom Howell – Thowell@repton.org.uk
- Gareth James – GJames@repton.org.uk
- Ben Page – BPage@repton.org.uk

5.3.2. **Safeguarding Support Team, DSL Trained Staff:**

- Nicola Blunt (NBlunt@repton.org.uk) Lead School Nurse
- Lucy Hoines (LHoines@repton.org.uk) Wellbeing and Mental Health Lead
- Rosie Clarke (RoClarke@repton.org.uk) HR Manager
- Christina Allen (CAllen@repton.org.uk) Commercial Manager
- Katie Brightman (KBrightman@repton.org.uk) Sports Centre Manager
- Laura Williams (LWilliams@repton.org.uk) Head of Enterprise Operations
- Pippa Parker – PParker@repton.org.uk SENDCO
- Géraldine Whitfield – GWhitfield@repton.org.uk Teaching staff

The DSL and Deputy DSLs at Repton School regularly attend courses with child support agencies to ensure that they remain conversant with best practice, including DSL Training, Annual Safeguarding Training and DDSCP Training. Their training meets the requirements of KCSiE and is refreshed at least every two years. Whilst the activities of the Designated Safeguarding Lead 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, SCO and Deputy Head (Pupil Wellbeing and Pastoral) are most likely to have a complete safeguarding picture and will be the most appropriate individuals to advise on any safeguarding concerns. The DSL will ensure the availability of the DSL (or a Deputy) during term-time as well as outside of term time for staff to discuss any safeguarding concerns. If the DSL is not available, contact a Deputy DSL or member of the SMT, or an external agency.

5.3.3. The DSL at Repton School maintains close links with the DDSCP (Derby & Derbyshire Safeguarding Children Partnership). National Police Chiefs Council (NPCC) When to call the Police should help the DSL (or a Deputy) to understand when to consider calling the Police and what to expect when they do. Details can be found here: when-to-call-the-police--guidance-for-schools-and-colleges.pdf

A detailed description of the role of the DSL and the required training content is set out in

Appendix 3 and *Keeping Children Safe in Education (2026) – Annex A*

6. The role of Governors

6.1. Ms Sally Wan is the Governor for Safeguarding and Child Protection matters for both Repton School and Repton Prep. The Safeguarding Governor meets with the Deputy Head Safeguarding, The Safeguarding Compliance Officer and the Deputy Head Pupil Wellbeing and Pastoral 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 will be presented and any significant issues highlighted. A termly summary of pastoral and safeguarding incidents, written by the Deputy Head (Pupil Wellbeing and Pastoral) and Deputy Head (Safeguarding), is communicated to the Pastoral and Safeguarding Committee (PASC) and discussed in the termly meeting, chaired by the Safeguarding Governor. Serious incidents relating to behaviour, bullying or safeguarding will be notified to the Safeguarding Governor and, if deemed appropriate, 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. A more detailed description of specific responsibilities is described in Part 2 KCSIE. In summary, the Governing Body will ensure that:

- Repton School has an effective Safeguarding and Child protection Policy, in line with national and local guidance and procedures;
- Repton School operates Safer Recruitment, Selection and Disclosure procedures;
- At least one member of the Senior Management Team is appointed as the DSL;
- The DSL attends appropriate refresher training every two years;
- All staff who work with children undertake regular safeguarding training;
- Temporary staff, contractors and volunteers are made aware of Repton School's arrangements for Safeguarding and Child Protection and their responsibilities;
- Repton School remedies any issues brought to their attention without delay;
- Repton School has procedures for dealing with allegations of abuse against staff/volunteers;
- This policy is reviewed annually;
- An annual safeguarding report is produced by the DSL and that audits are completed regularly and reported to the Local Authority.

7. Induction & Training for staff

7.1. 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 Headmaster.

7.2. On induction, staff are provided with training on the Staff Code of Conduct, the safeguarding response to children who are absent from education, and the identity of the DSL, the SCO and the Deputy DSLs. All new staff sign to confirm that they have read and understood Part 1 and Part 5 of KCSiE including Annex A (Further Information).

7.3. Staff are also trained in Online Safety (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) in conjunction with the Repton Code of Conduct and Acceptable Use of IT policy. Safeguarding training is also given to new volunteers.

7.4. Staff are provided with a copy of:

The Safeguarding Children and Child Protection policy (including Children Absent from Education, whistle-blowing and the role of the DSL and Deputies)

- The Staff Code of Conduct
- KCSiE (Sept 2026) - ***including Part 1, Part 5 and Annex A: Further Information that must be read by all staff***
- Behaviour Management Policy
- Online Safety Policy

7.5. Whole school training in Safeguarding and Child Protection is provided for all staff / volunteers / employees of the School including the Headmaster.

7.6. All staff complete Safeguarding refresher training annually in line with KCSIE and the DDSCP.

7.7. Training covers the content of this Safeguarding and Child Protection Policy; the Staff Code of Conduct; Low-level Concerns, Allegations and Whistleblowing policy KCSiE including Part 1, Part 5 and Annex A: Further Information; Online Safety along with the identity of the DSL, Deputy DSLs and Safeguarding Governor. It further places emphasis on safeguarding being a child centred approach and that it is 'everyone's responsibility, all of the time' to safeguard our pupils from harm or abuse. Training also promotes staff awareness of other important areas, including Mental Health, Cyberbullying, Child Criminal Exploitation, County Lines, Children Missing from Education (CME), Child Sexual Exploitation (CSE), Honour based abuse (incl. Female Genital Mutilation), PREVENT duty/Channel, Child on Child abuse (including, harassment, violence intimate images, sexual violence and sexual harassment),

7.8. 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.

7.9. All staff are required to confirm annually that they have read and understood Part 1 and Part 5 of KCSIE, including Annex A: Further Information and the Safeguarding Children and Child Protection Policy. Staff are updated regularly (e.g. via email, newsletters or staff meetings) 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 1 of KCSiE (2026). This is to help all staff to have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report. This includes knowledge of the process for low-level concerns, allegations against professionals and whistleblowing. 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, following the correct procedures with the safety and wellbeing of the children in mind at all times.

7.10. The Headmaster, Senior Leaders and all Governors receive a copy of KCSiE 2026 and confirm that they have read the whole document.

8. Forms of abuse and other safeguarding concerns:

8.1. All staff

Should be aware of indicators of abuse and neglect (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.

8.2. 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. Children may also cause harm to other family members (child to parent or care giver abuse).

8.2.1. Different categories of child abuse are defined in KCSiE:

Physical Abuse	Emotional Abuse	Sexual Abuse	Neglect

For a detailed explanation of these forms of abuse see Appendix 1

8.2.2. All staff, but especially the Designated Safeguarding Lead (and Deputy DSLs) 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) physical, sexual and emotional abuse (including stalking, harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal or financial exploitation, serious youth violence, county lines and radicalisation.

8.2.3. 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 making or sharing of nudes or semi-nude images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

8.3. Other specific safeguarding issues include:

- Mental Health related (pupil / family / friends)
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Female Genital Mutilation (FGM)
- Faith or Honour' based abuse
- Forced Marriage
- Radicalisation
- Trafficking
- Fabricated or induced illness
- Gambling
- Gangs and youth violence
- Gender based violence / Violence against women & girls (VAWG)
- Online abuse / Other online risks / Making or sharing nudes or semi-nudes
- Teenage relationship abuse
- Child on child abuse (bullying; cyber-bullying; sexual violence and sexual harassment including LGBTQ+ related); physical abuse; making or sharing of nudes or semi-nudes; upskirting; initiation & rituals; verbal abuse including "banter)
- Children Missing in Education (CME)
- Private Fostering
- Domestic Abuse
- County Lines (See Appendix) / Serious violence linked to County Lines
- Harmful sexual behaviour
- Viewing extremist/terrorism content online
- Substance misuse
- Children known to social care or Looked After Children

More information about these issues can be found in Appendix 1 and KCSIE Part 1 and Annex A: Further Information.

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: ddscp-threshold-document-final-december-2025.pdf

9.1. Early Help / Family Help

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

Providing community based 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, including education and health services.
The DSL leads when a referral to Family Help is appropriate (refer to WTSC 2026).

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
- The child is at risk of modern slavery, trafficking or exploitation.
- The child is showing early signs of abuse, neglect or exploitation.
- 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 misusing alcohol and other drugs adult mental health issues and
- The child is misusing alcohol and/or other drugs themselves.
- *Other groups, see WTSC 2026*

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 understands this to mean not just physical but mental and emotional health.

The meaning of 'wellbeing' for the purposes of the Standards, and ISI's values, is defined by section 10(2) of the Children Act 2004 as relating to:

- Pupils' physical and mental health and emotional wellbeing
- Protection of pupils from harm and neglect
- Pupils' education, training and recreation
- Pupils' contribution to society
- Pupils' social and economic wellbeing.

Repton 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 Code of Conduct) and a set of school rules by which all pupils are expected to abide. The Repton Pupil Safeguarding Policy supports pupils’ understanding of how to keep themselves safe, including online, and how they can seek help. 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 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 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 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, as a means to good mental health.

11. Mental Health & Safeguarding

As per KCSiE 2026, all staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. All staff 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 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. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like, and
- Physical signs of self-harm or neglecting themselves.

Not every child who exhibits these symptoms has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify those who may be struggling with their mental health and offer support and vital early interventions, via the staff in the Health and Wellbeing centre. If staff have a concern about a child's mental health that is also a safeguarding concern, they should speak to the DSL or a deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately. If it is not an emergency, staff can get help from NHS 111, and/or seek support from the staff in the Health and Wellbeing centre.

Repton has a Wellbeing Policy setting out the approach to mental health related issues with clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and support systems. Repton recognises that pupils identified as being especially vulnerable in terms of mental health related concerns are potentially at greater risk of harm than others.

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 CPOMS or e-mail/telephone/face-to-face communication). Urgent concerns should be communicated by telephone to ensure a prompt response.

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 houses and about the school site.

There are notices about the school site to highlight to pupils that they can access support from trusted adults including:

- The School Nurse and Mental Health Lead Nurse
- The School Doctor
- Matron
- Houseparents
- Teachers
- The School Counsellor (and other members of the school counselling team)

If required, pupils can also access support from external sources too: e.g. NHS / CAMHS / private support. Derbyshire guidance and procedures: Self Harm (ddscp.org.uk)

12. Looked after children/young carers and children with disabilities/private fostering

12.1. SEND

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

- Assumptions that 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 disproportionally 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 is alert to the extra vulnerabilities of SEND children. At Repton School, the Personalised Learning Department takes the primary lead in supporting children with special educational needs, however **all staff** have a role to play in supporting pupils.

12.2. Looked after children (LAC)

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".

12.3. Private Fostering

Repton School is not involved in making arrangements for private fostering but if 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 for children with a disability) 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.

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.

It is not the School's policy to organise or encourage exchange visits which result in pupils staying with host families e.g. an MFL trip. Special or separate

consideration would be given to a Repton RFS Exchange where the supervision of pupils was undertaken by Repton staff. Reference to safeguarding support is provided in the EV Risk Assessment for all school overnight accommodation at education centres.

12.4. 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 / Repton School to the relevant local authority where the pupil is staying.

13. Pupil attendance and children absent or missing from education

It is the responsibility of the boarding houses (Houseparent's responsibility) to follow up on children who are absent each morning. Regular or persistent absences will be reported to the Deputy Head Pupil Wellbeing and Pastoral. Attendance rates will be monitored and parents contacted with regard to **any** concerns. Children's who's absence becomes of concern will be reported to the Local Authority in line with statutory absence reporting guidance. Further detail can be found in the Attendance Policy and the Working Together to Improve School Attendance statutory guidance Working together to improve school attendance (applies from 19 August 2025) (publishing.service.gov.uk)

Government guidance on attendance being affected because of mental health issues is followed. Mental health issues affecting a pupil's attendance: guidance for schools - GOV.UK (www.gov.uk)

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 mental health, 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.

Children Missing Education - Guidance for Local authorities (publishing.service.gov.uk)

DDSCP guidance can be found here: Children missing from education (CME) policy and guidance

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

14.1. Child on Child Abuse

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

- abuse within intimate partner relationships e.g. emotional
- bullying (including cyberbullying)
- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or
- otherwise causing physical harm; and initiation/hazing type violence and rituals.
- sexual violence and sexual harassment between children in schools and colleges
- consensual or non-consensual making or sharing nudes and semi nudes - the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'. Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK

14.1.1. 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 children who are lesbian, gay, bisexual or gender questioning are potentially at greater risk. Also, pupils with certain medical or physical health conditions can face additional safeguarding challenges, both online and offline.
- Staff at Repton are alert to the potential for inappropriate pupil relationships, and the potential for child on child abuse, in the boarding setting.

14.1.2. 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 or bisexual (LGB) or gender questioning is not in itself an inherent risk factor for harm, however children who are LGB or gender questioning can be targeted by other children. In some cases, a child who is perceived by other children to be LGB or gender questioning – whether they are or not – can be just as vulnerable as children who identify as LGBT. 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 the designated safeguarding lead (or deputy).

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

15. Guidance for staff

15.1. Staff should know

- School 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 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 then everyone who comes into contact with them (not least Repton 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 internal pastoral support processes or Family Help, noting that Family 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 2026 and contact the DSL or SCO or Deputy 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, thenominated safeguarding leads 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 DSL and SCO 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 2012 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.

15.2. 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:

- Safeguarding and Child Protection policy, which should amongst other things also include the policy and procedures to deal with child on child abuse; Online Safety policy
- Behaviour Management policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- Staff behaviour policy (which includes the staff code of conduct) – which includes 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 Repton Attendance Policy has full details and has been developed in line with this guidance: Working together to improve school attendance (applies from 19 August 2024) (publishing.service.gov.uk)
- The role of the Designated Safeguarding Lead (DSL) - including the identity of the Designated Safeguarding Lead and Deputy DSLs.

15.3. Copies of policies and a copy of Part One, Part Five and Annex A: Further Information of KCSiE 2026 should be provided to all staff at induction.

- All staff should receive appropriate safeguarding and child protection training (including online safety) 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), regularly, and at least termly, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff should be aware of the process for community-based Family Help assessments, including targeted early help level and understand their role in it. Working Together to Safeguard Children has a fuller definition of early help and Family Help processes.
- 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 is 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.

15.4. Staff should know that any child may benefit from community-based early help, or the targeted early help level of Family Help. All staff should be particularly alert to the potential need for additional support for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need
- is a young carer
- is 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.
- Children affected by bereavement or loss
- Children who have self-harmed or experienced suicidal ideation.
- Children who are refugees, asylum seekers or from newly arrived families.

15.5. Staff should:

Be alert to signs of abuse.
Be aware of relationships in boarding and the potential dangers of bullying, sexual relationships, misuse of alcohol and other drugs leading to abuse by peers.
Be aware of the different avenues for the pupil to seek or be sign posted to internal pastoral processes for 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-nude 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 best interest 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 statuary 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, 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 (LADO).

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

(see Appendix 1 – Types and Signs of Abuse and Neglect, including Indicators)

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual making and 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 including harassment and violence))
- Serious violence
- Online safety

15.7. Staff working with children should maintain an attitude of "it could happen here" where safeguarding is concerned and staff should always act in the best interests of the child.

- If staff have any concerns about a child's welfare they should act on them immediately (see Appendix 5 – Action where there are concerns about a child) by contacting the Designated Safeguarding Lead and following the Repton School Child Protection Policy, with options then including:
  - Managing any support for the child internally via pastoral support processes
  - Undertaking a Family Help Assessment
  - Making a referral to statutory services (having made reference to the DDSCP Threshold Document).

- The Designated Safeguarding Lead (or SCO or Deputy DSLs) should always be available to discuss safeguarding concerns. If staff are unsure, they should always speak to the DSL or a deputy.

- 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 community-based early help or Family 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. Staff are able to utilise the professionals consultation line where they may consulted on a no-names basis for further advice on thresholds. 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.

- If children do not require the support of statutory children's services, the DSL (or a deputy) will generally lead the liaison with other agencies and setting up an inter-agency assessment as appropriate.

15.8. 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.

15.9. 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 and neglect, 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)
- 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 Working Together to Safeguard Children for details of the Section 17 and Section 47 process: **Working together to safeguard children - GOV.UK (www.gov.uk)**

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/SCO/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).

15.10. 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.

15.11. 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. All initial handwritten and typed notes should be kept when a child has raised a concern or made a disclosure.
- 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)

15.12. 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. Link to updated guidance (February 2025 Alternative provision - GOV.UK)

15.13. 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.

16. Listening to pupils (reporting systems for pupils) and what to do when faced with a disclosure of pupil abuse or neglect

16.1. Repton School provides a range of opportunities for pupils to be listened to, including: daily interactions with key house staff (housemaster, matron, tutors, domestic and support staff); tutor sessions; house meetings and house forums; Wellbeing surveys; availability to talk to the School Nurses, the School Doctor, the School Chaplain, a member of the counselling team; the Head of Personalised Learning (SEND); meetings with the Head of House.

Contact details for key staff – including the School Nurses/School Doctor at the Health & Wellbeing Centre; DSLs; the School Chaplain; the Head of Personalised Learning; counselling staff; the Independent Listener – and NSPCC Helpline and other key helplines are made available to the pupils. Reporting systems are well-promoted, easily understood and accessible to pupils which allows them to confidently report abuse and give feedback. As part of Repton School's Safeguarding and Child Protection measures, pupils are able to report anonymous concerns via the Microsoft Form link found on posters in the boarding houses and around the site, where they can safely report any concerns or issues they may have. The DSL and a DDSL will respond to each report on a case-by-case basis. If possible, the report is investigated and relevant actions taken. If the person reporting the concern is known, and it is deemed appropriate, updates and feedback may be given. Should the report/concern be about a member of staff, volunteer, trainee-teacher, visitor to the school or contractor, the Low-Level Concern procedure will be put in place, ensuring due regard for both the pupil and adult involved.

- 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, trainee-teacher, 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 Headmaster. 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 (including harassment and violence) could happen, 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 intimate images,; 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 school policies and procedures.

- Additional guidance about how to manage a report of harmful sexual behaviour is provided in Part 5 KCSIE. Where the report includes an online element, do not view or forward illegal images of a child. See the UK Council for Internet Safety and Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024) - GOV.UK about what to do when viewing an image is unavoidable.

- 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 Pupil Behaviour Management Policy.

- The School's safeguarding and child protection procedures are not intended to prevent **any person** from making a referral to Children's Social Care (or the Police / LADO). 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, any person should phone 999 to alert the emergency services. If there is a genuine concern that appropriate action has not been taken by senior staff (including the Headmaster), 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 Management 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 reassurance and to 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 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 SCO, or the Headmaster, except where the allegation(s) concern the DSL, the report should go directly to the Headmaster.

- 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.

16.2. Pupil making a disclosure - Step-by-step action:

You **must not** 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.
Reassure the pupil, but do not promise confidentiality. Explain that a formal process will follow, following School policy. Do NOT make any attempt to investigate further.
Ensure the safety of the pupil within the School [Immediately contact the Police if the child is at risk of immediate harm]
At the earliest opportunity contact the **DSL / SCO / Deputy DSL** *If it is an allegation against a member of staff contact the **Headmaster.** Contact the Chairman of the Governing Body if the allegation is about the Headmaster* Send a summary of the disclosure to the DSL via CPOMS (or by e-mail to the Headmaster if the allegation is against a member of staff). A Low-level concern regarding an adult can also be reported as per the policy. Do not share information with anyone else.
The DSL / SCO / Deputy DSL will liaise, seek advice from the Local Authority Children's Services and refer the matter to the appropriate agencies (no issue is expected to be solely dealt with by one individual)
The DSL / SCO / 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 and other external agencies as required.
**Note - Any individual can contact Call Derbyshire, Starting Point / Police at any time to gain support, liaise or refer matters to the appropriate agencies*

- 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 external agencies, who can provide advice and support as to next steps and referral routes.

- Welcome to the Online Procedures for the Derby and Derbyshire Safeguarding Children Partnership (proceduresonline.com)

- If the safeguarding concerns involve a member of staff, trainee-teacher or volunteer the School will consult and share all available information with the Derbyshire LADO and follow their 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 Safeguarding). 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 Headmaster, the Principal Deputy Head, 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, with a referral required to Derbyshire Children's Social Care it is important that the safeguarding concern is reported immediately. The DSL and/or the SCO 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 the relevant local authority 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 (alleged) 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 the concern raised meets the

relevant threshold. Derbyshire Children's Social Care, the DSL, the SCO and the Headmaster will decide in the circumstances what further steps should be taken. This could involve informing parents and calling the police. More information is in Appendix 7.

- The DSL and the Headmaster 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.

17. 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). Additional information for Music and Singing teachers is covered in the WSP 29 – Physical contact policy.

- 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 Housemaster/mistress, Deputy Head Safeguarding, Deputy Head Pupil Wellbeing and Pastoral or Principal Deputy Head, is aware of the journey in advance
    - the pupil sits in the back seat of the vehicle
    - both pupil and member of staff carry a mobile phone
    - **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 housemasters 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). Pupil meetings in the Housemaster's private side are recorded centrally.

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

18. Safeguarding concerns and allegations against staff or another adult in the school (including governors, supply teachers, trainee teachers, volunteers and contractors)

18.1. Concerns or allegations that may meet the harm threshold

Safeguarding allegations or concerns may be made against a member of staff, a volunteer, a governor, a pupil, parent or other person connected to the School. Safeguarding allegations or concerns against staff will be dealt with according to the statutory guidance set out in Part 4 of KCSiE and section two of the DDSCP 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 supply teacher, trainee teacher, volunteer or contractor) 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

The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk. The 'harm test' is explained further here: Making barring referrals to the DBS - GOV.UK (www.gov.uk)

Staff and volunteers who hear a safeguarding allegation or concern (that may meet the harm thresholds) against another member of staff, governor or volunteer should immediately report the matter to the Headmaster. In the Headmaster's absence, the allegation should be reported to the Chairman of Governors or the Liaison Governor for Safeguarding. If the Headmaster is the person against whom the allegation is made, the allegation must be communicated to the Chairman of the Governors without the Headmaster being informed. If you are unsure of whether a concern meets the harm thresholds, please check with the DSL or SCO to get their advice.

In the case of serious harm, the Headmaster (or Chairman of Governors or Liaison Governor for Safeguarding as appropriate) should inform the police immediately.

Where the allegation(s) concerns the DSL, the staff member should report the matter to the Headmaster, or, in his absence, to the Chairman of Governors or the Liaison Governor for Safeguarding. Where there is a conflict of interest in reporting a matter to the Headmaster then the matter should be reported directly to the LADO.

In the event of a safeguarding allegation being made against a member of staff, the Headmaster will immediately, and without further investigation, consult with the DSL and/or the SCO 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. 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 an investigation by the police or local authority 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 – carried out by a senior member of the school – and, as required, deal with the member of staff in accordance the School's disciplinary procedure.

The adult to whom the allegation/concern 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 Headmaster or a member of the Governing Body, the Chairman of Governors or, in his absence, the Safeguarding Governor, 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 Headmaster refer the matter to the LADO. In any case, any safeguarding allegation or concern against the Headmaster or a member of the Governing Body can be referred directly to the LADO. 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 works 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.

If an allegation is received when an individual or organization was using Repton School premises for the purposes of running activities for children, the LADO will be informed.

18.1.1. **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 in accordance with Part 4 of KCSiE 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 and the

School's employment procedures. As a school we will apply the views of the LADO, KCSiE and WTSC 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.

18.1.2. **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 (September 2026): 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. See KCSiE 2026 and WTSC 2026 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.

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. DBS barring referrals flowchart - GOV.UK

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 2018). Further guidance is published on the Teaching Regulation Agency website. Teacher Misconduct - the prohibition of teachers (.gov.uk)

18.1.3. **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 Headmaster 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.

18.2. Concerns or allegations that do not meet the harm threshold

18.2.1. Low Level Concerns

Repton 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,

trainee teacher, volunteers and contractors) are dealt with promptly and appropriately. All concerns about adults, no matter how small, must be reported and shared responsibly and with the right person, recorded and dealt with formally and appropriately. Doing so should encourage an open and transparent culture; enable Repton to identify any inappropriate, problematic or concerning behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Repton 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 and 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 shared about a member of staff as a low-level concern meets the harm threshold then Repton will consult with the LADO.

Examples of behaviour regarded as a low-level concern could include, but are not limited to: humiliating pupils; being over friendly with children; having favourites; taking photographs of children on their mobile phone; 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, the Low-level Concerns Policy (see Appendix 8) will be followed, along with 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. Where a low-level concern (including self-reports) is noted, it should be reported to the DSL or SCO as soon as reasonably possible on the same day as the incident (where the concern relates to a particular incident) or as soon as the concern is identified, either verbally or in writing. Alternatively, if preferred, a concern could be reported directly to the Headmaster, for example if the concern relates to the DSL. Where the concern is about the Headmaster, this should be reported to the Chair of Governors.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, Repton should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

19. Whistleblowing

All staff are required to report any concerns to the Headmaster about poor or unsafe safeguarding practices at Repton 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 Headmaster 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 – is available for staff who do not feel able to raise safeguarding concerns internally. Whistleblowing Advice Line | NSPCC

20. 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 and neglect, and in promoting children's welfare, including educational outcomes. **Data protection laws 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 details on information sharing can be found:

- In Working Together to Safeguard Children, which includes a myth-busting guide to information-sharing. Working together to safeguard children 2026

- Information sharing advice for safeguarding practitioners - GOV.UK – particularly the seven golden rules for sharing information on page 4. DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people,parents and carers

- Sharing information to safeguard children and young people in the education sector in the UK | ICO

- Data protection in schools - Guidance - GOV.UK

21. Self-Reporting/Safer Recruitment and Safe Employment Practices and SCR

21.1. 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. 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
- A confidentiality breach

21.2. Safer recruitment & safe employment practices and the Single Central Register (SCR)

As part of a whole school approach to safeguarding, Repton 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 safer recruitment procedures, as set out in KCSiE, members of the teaching and support staff at the School (including part-time staff, temporary and supply staff, trainee teachers, 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 or issues 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 2026 for further details.

All governors, trainee-teachers volunteers, and contract staff who are akin to employees are also subject to the relevant statutory checks. Volunteers working in schools for more than 3 days in a 30 day period, or overnight, must have an Enhanced DBS and Barred List check. 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 School, Repton Prep or on another site.

22. Visitors, Volunteers, Contractors and Visiting speakers

Repton School has a Visitors, Volunteers, Contractors and Visiting Speakers Policy.

For on-site visits, any visitor 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. All visitors must make themselves familiar with the safeguarding information sheet which is available to access when signing in at the Lodge or Sports Centre Receptions.

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 member of staff responsible for organising the visit will complete the relevant forms and/or undertake a risk assessment before agreeing to a Volunteer, Contractor or 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.

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/SCO; undertake an internet search to research the profile and background of the speaker; complete the Visiting Speaker Form a week in advance of the visit and adhere to our safeguarding requirements. The School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided. More guidance can be found here: Hosting-Speakers-on-School-Premises-May-2026.pdf

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 (by a member of staff) to a company email address (never a personal one) and the housemaster must be copied into all communication.

23. 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.

23.1. 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)
- **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.

23.2. 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 by Safer Derbyshire Prevent referrals and Prevent Pathway - Children for the Safer Derbyshire Prevent Pathway flowchart.

Referrals of vulnerable students / pupils are made into the Channel process, by the DSL or SCO, to provide early intervention to protect and divert people away from the risks they face and reduce vulnerability. In this case the DSL or SCO acts as the SPOC (Single Point of Contact).

24. RSHE (Relationships, Sex and Health Education) and SMSC (Spiritual, Moral, Cultural and Social) education developments

There is a separate policy which covers Repton School's approach to RSHE. . Repton's RSHE curriculum is designed to cover both the content of statutory guidance on RSE 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. This includes healthy and respectful relationships, consent and boundaries, coercive and controlling behaviours, concerns around abusive relationships, misogyny, violence against women and girls, online manipulation and exploitation. sexual harassment and sexual violence, understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers. How to report concerns and seek support from trusted adults are important elements of this education.

In addition to these statutory elements of the course, the Repton RSHE 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 Senior building on the foundations laid through PSHE at Repton Prep.

The content and delivery at Repton School is designed to encourage respect for others with regard to protected characteristics. Throughout the course principles 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 RSHE 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, World Kindness Day, Anti-Bullying Week, Lunar New Year, Pride Month and Black History Month, amongst others.

Importantly the RSHE 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.

25. Teaching pupils how to keep themselves safe, including the delivery of 'Prevent' strategy:

25.1. Teaching pupils how to keep themselves safe:

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.

25.2. Prevent

Like all schools and colleges, 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 PSHE are based around the Values and Aims of the School and alongside this Repton 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 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
- Fundamental 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

26. Online safety - Use of technology and arrangements for safe 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 approach to online safety empowers a school 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 DSL is the nominated person with responsibility for Online Safety. 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, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

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

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

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

26.1. Acceptable Use of IT Agreement and Online Safety Policy

- Repton School has an Acceptable Use of IT Agreement and Online Safety Policy.
- The safe use of technology is a key part of the Repton curriculum. ICT safety measures 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 and School Devices is managed through filtering and monitoring systems (using *Smoothwall*) to ensure that IT is being used in a safe and appropriate manner. A review of their effectiveness is carried out at least once every academic year by the DSL, with the support of the Director of IT. This includes checks that filtering is working appropriately on all internet-connected devices in all relevant locations and a record is kept of these checks.
- Staff are made aware of expectations and their roles and responsibilities for filtering and monitoring to aid their understanding. Meeting digital and

technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK

- The Department for Education has published guidance to support schools to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) and explains how filtering and monitoring requirements apply to the use of generative AI in education. Generative AI: product safety expectations - GOV.UK . 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, make or share nude or semi-nude 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. Plan technology for your school - GOV.UK
  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 pupils

27. Use of mobile phones & cameras/recording devices

As technology continues to evolve, new devices are introduced. Wearable recording devices, including 'Smart Glasses' – eyewear that looks like ordinary spectacles but can include built-in cameras, microphones, and internet connectivity. Smart glasses can discreetly record, live-stream, or share content instantly, and therefore can pose risks to pupils, staff, and visitors. The use of smart glasses will not be permitted on school grounds by pupils, parents, visitors, or staff.

27.1. 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 School are alert to these rules, to ensure that pupils use of mobile phones is appropriate and in line with the statutory guidance on Mobile phones in schools - GOV.UK

27.2. Staff

Staff are briefed on appropriate use of their own IT devices, including a clear message that images of children should not be taken or stored on any personal mobile phone or device. 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/washroom/toilet areas).

27.3. 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). See Appendix 9.

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.

28. Monitoring and evaluation of this policy

The School monitors and evaluates its Child Protection and Safeguarding Pupils 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 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 Housemasters' meetings
- via the Filtering and Monitoring 'alert' system on the IT network
- discussion at regular School Prefects meetings, and House Prefects meetings, led by Housemasters/mistresses;
- scrutiny of attendance data
- the Deputy Head (Operations and Behaviour) regularly reviews House records regarding behaviour, discipline and sanctions, and maintains a bullying log
- regular review of parental complaints and concerns by the Principal Deputy Head/Deputy Head Pupil Wellbeing and Pastoral
- close liaison between the Health and Wellbeing Centre staff, the School Doctors, the Deputy Head (Safeguarding) and the Deputy Head (Pupil Wellbeing and Pastoral)
- discussion at Matrons' meetings.
- 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 1 – Types and signs of abuse and neglect, including indicators

All staff should be aware of indicators of abuse, exploitation and neglect, 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, exploitation and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Abuse, neglect 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 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.

Different categories of child abuse are defined in KCSiE:

Physical Abuse	Emotional Abuse	Sexual Abuse	Neglect

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

Emotional Abuse
The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse such as persistent criticism, belittling or name-calling, 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 (Including harassment and violence)

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 aware that child-on-child on abuse is a safeguarding issue for both the victim and alleged perpetrator. Child-on-child abuse is preventable and it may involve serious physical harm or threats involving weapons.

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 and/or Deputy Head Pastoral (using Add an incident on CPOMS / 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 child on per 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 and could include:.
1. bullying (including cyberbullying, prejudice-based and discriminatory bullying)
2. harmful sexual behaviour, sexual violence (such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);sexual harassment which may include misogyny/misandry
3. abuse in intimate personal relationships between children e.g. emotional (sometimes

known as ‘teenage relationship abuse’).
4. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
5. self-generated intimate images and videos – consensual and non-consensual making and sharing of nudes and semi-nude images and/or videos (including AI-generated images e.g. deepfakes)
6. upskirting
7. 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.

Where possible houseparents’ and staff are asked to provide as much contextual information as possible as part of the referral process.

Further information on Contextual Safeguarding and Assessment frameworks: 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:

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 an organised network or gang and victims may identify as part of this group.. 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 and most sexual abuse is committed by individuals known to the victim.

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.

Both CCE and CSE may include children who have been moved (trafficking) and this may constitute Modern Slavery: Modern slavery: how to identify and support victims - GOV.UK

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.

All staff should have an awareness of safeguarding issues linked to county lines that can put children at risk of harm, as well as serious violence linked to county lines.

Further information on County Lines can be found on the NSPCC website: **NSPCC: Protecting children from County Lines** Protecting children from county lines | NSPCC Learning

Serious Violence
Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, or associated with criminal exploitation. Indicators, which may signal children are at risk from, or are involved with, serious violent crime, may include:

- increased absence from school or being permanently excluded 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 or involved in offending.

A fuller list of risk factors can be found in Annex A of KCSIE 2026

Staff should also be alert to when pupils might be at highest risk in the school day e.g. immediately after school. Staff should report any concerns about a child carrying or using a weapon to the DSL or deputy. The DSL should assess the risk to the individual and others in the school and take appropriate action. Early, evidence-based support for those considered at risk, as well as when concerns emerge, is vital.

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.

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. staff should be aware of sexual violence and sexual harassment with regards to child-on-child abuse

Staff should be aware of how to investigate, report and support victims and perpetrators of sexual violence and/or sexual harassment

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.

Upskirting is an important part of pupil and staff safeguarding education and training.

Education on upskirting is embedded in Repton 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). If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, the teacher must report this to the Police via 101. This cannot be delegated to the DSL. For further information, DDSCP have issued guidance Female Genital Mutilation 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.

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

FGM - (.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://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 '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: fmu@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.

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 making or sharing of nude or semi-nude 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
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 2 – Harmful Sexual Behaviour (HSB), sexual harassment and sexual violence

HSB can occur between two or more children of any age or sex. It can occur through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual development and behaviour in children | NSPCC Learning

All staff must read Part 5 of KCSIE and respond to all signs, reports and concerns of HSB, child on child sexual harassment and sexual violence. This includes incidents occurring inside or outside of school and/or online. All staff should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual harassment and sexual violence; that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys".
- recognising, acknowledging, and understanding the scale of HSB, sexual harassment and sexual violence and 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,
- recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence,
- challenging behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

Children who are victims of HSB, sexual harassment or sexual violence wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Staff should be aware it is more likely girls will be the victims of sexual harassment and sexual violence and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

HSB can, in some cases, progress on a continuum. Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma and must be offered appropriate support.

Sexual violence

When referring to sexual violence, KCSiE 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.
Sexual assault covers a wide range of behaviour so a single act of kissing someone without consent or touching bottom/breasts/genitalia without consent can still constitue sexual assault.

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

Sexual harassment
When referring to sexual harassment this refers to 'unwanted conduct of a sexual nature' that can occur online and offline, that can occur both inside and outside of school, 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 and 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 should assess when any of
  this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim)
- displaying pictures, photos or drawings of a sexual nature
- upskirting is where someone takes a picture under a persons 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.

and online sexual harassment may include:

- consensual and non-consensual making and sharing of nude and semi-nude images and/or videos
- sharing of unwanted explicit content
- 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're 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) provides advice for education settings working with children and young people

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 must inform the DSL (or a deputy) by telephone immediately.

- As is always the case, if staff are in any doubt as to what to do they should speak to the DSL (or a deputy).

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 or a deputy)
- 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
- 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. 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 , as soon as practically possible, if the Designated Safeguarding Lead (or a 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 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 external agencies such as children's social care and the police as needed.
- 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, confident and well known social standing? 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.
- 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 will work with external agencies to best understand the most appropriate steps after a report of sexual violence or harassment. 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 in KCSiE 2026 Part 5. Shore - Lucy Faithfull Foundation is a safe space for teenagers worried about sexual behaviour.

Appendix 3 – The Role of the Designated Safeguarding Lead (DSL)

The name and contact details of the DSL and Deputy DSLs are set out in Section 1, Key Contacts. In accordance with Annex B of KCSIE, the main responsibilities of the DSL are:

Managing referrals
The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to the local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service (DBS) as required. This duty applies equally to paid staff and volunteers where they were engaged in regulated activityand
- refer cases where a crime may have been committed to the police as required.

Work with others
The DSL is expected to:

- liaise with the Headmaster to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; The School will ensure any pupil has access to an appropriate adult in accordance with PACE code C 2019 (usually a parent, guardian or social worker)
- liaise with the Chair of the Pastoral and Safeguarding Committee
- as required, liaise with the Case Manager and the Local Authority Designated Officer for child protection concerns in cases which concern a staff member;
- liaise with staff(especially pastoral support staff, school nurses, IT staff and SENCOs/named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for staff.
- act as a point of contact with the safeguarding partners
- act as the nominated person with responsibility for Online Safety
- liaise with the Mental Health Lead for safeguarding concerning mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the Headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

    - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
    - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

Raise awareness
The DSL should:
- ensure the School's child protection and safeguarding policies and processes are known, understood and used appropriately;
- ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly;
- ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- link with DDSCP to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child Protection File
Where children leave the School the DSL shall ensure their child protection file is transferred to any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.
In addition, the DSL will consider if it is appropriate to share any information with the new school or college in advance of a child leaving.

On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCO/named person with oversight for SEN.

Prevent
In accordance with the *Prevent duty guidance for England and Wales* and *Channel duty guidance: Protecting people susceptible to radicalisation* the DSL has, in addition, the following responsibilities:
- acting as the first point of contact for parents, pupils, teaching and non-teaching staffand external agencies in all matters relating to the Prevent duty;
- coordinating Prevent duty procedures in the School;
- liaising with local Prevent coordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated;
- undergoing appropriate training;
- maintaining ongoing training programme for all School employees including induction training for all new employees and keeping records of staff training; and
- monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

Training
The DSL and the Deputy DSLs have undertaken training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent duty awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
- understand the assessment process for providing community-based early help, effective assessment of the need for Family Help and statutory intervention, including local criteria for action and local authority Children's Social Care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the School's child protection and safeguarding policy and procedures, especially new and part-time staff;

- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the School, and with the DDSCP and other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and Disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- 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; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Appendix 4 - 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.

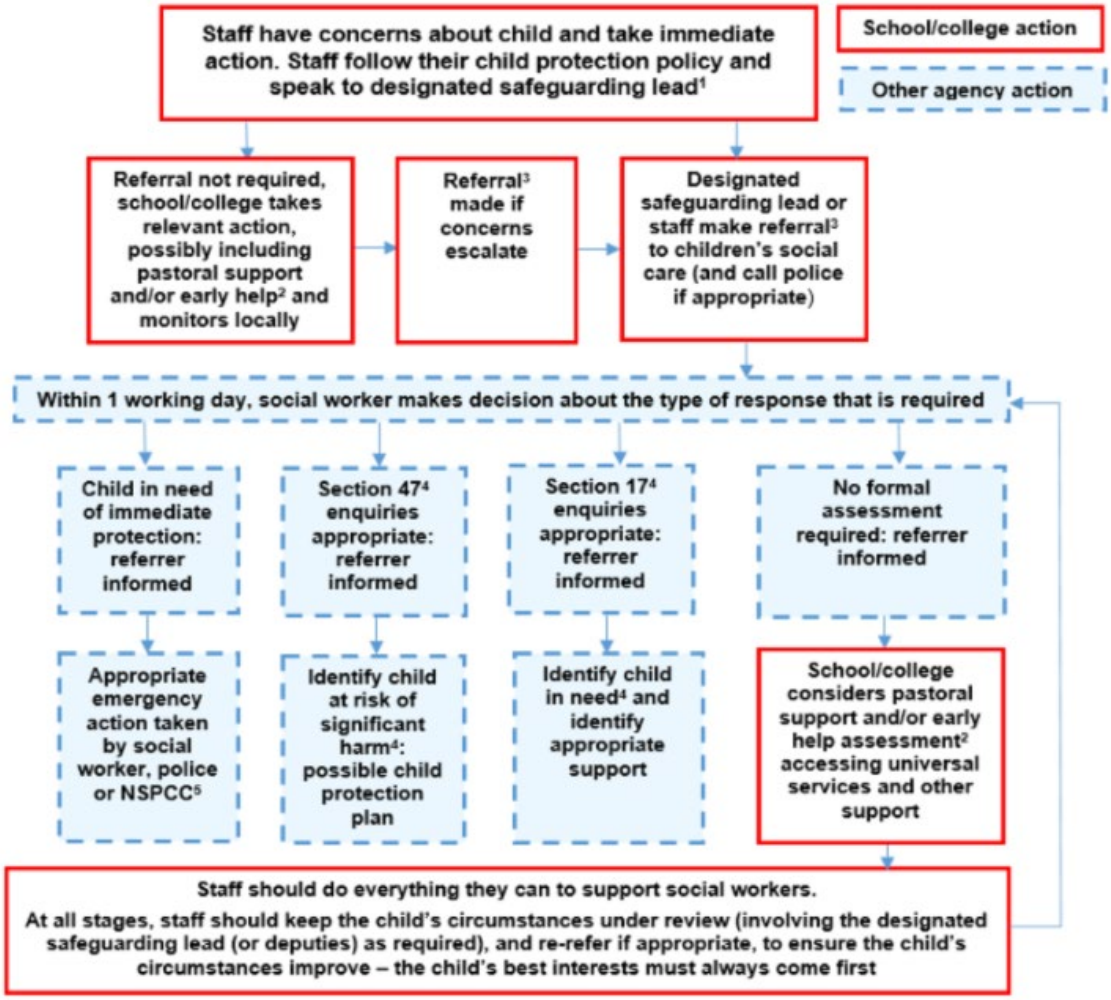
The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be 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.

All staff must ensure they are familiar with the updated guidance: Restrictive interventions, including use of reasonable force, in schools (2026). This document aims to help schools proactively minimise the need to use restrictive interventions through early support, prevention and de-escalation strategies, and when necessary, to help school staff feel more confident in knowing how to use these interventions safely, appropriately and lawfully.

Further information: Use of reasonable force in schools

Appendix 5 – Actions Where There Are Concerns About A Child



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

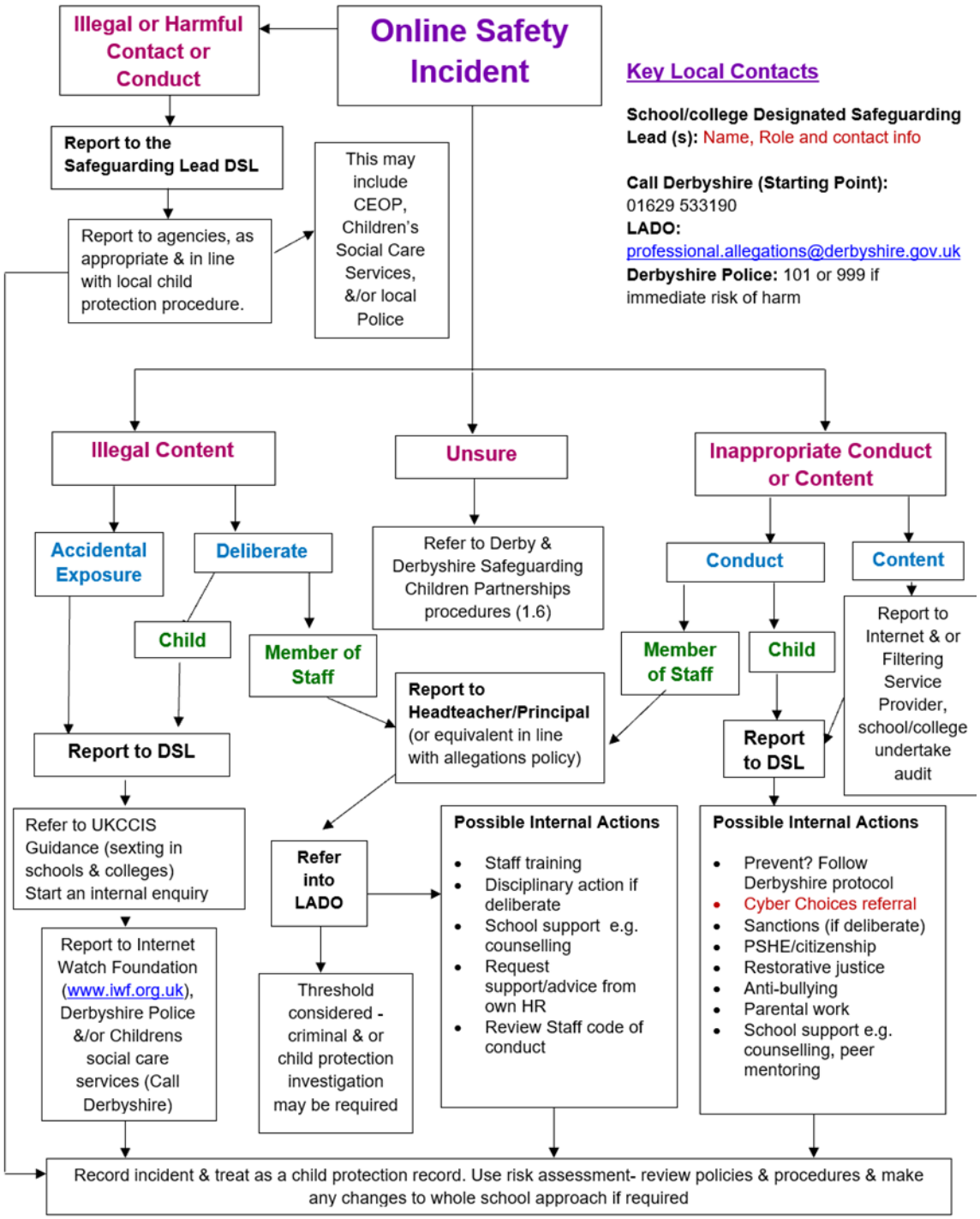
[2] Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.

[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.

[4] 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 Working Together to Safeguard Children.

[5] This could include applying for an Emergency Protection Order (EPO).

Appendix 6 – Responding to an online safety concern



Reformatted with kind permission from theeducation people, Online Safety Education Advisor, www.kesi.org.uk
Version 3 - 2020/21. DP CPM Schools/Education
04/12/2020

Appendix 7 – DSL Response To A Safeguarding Concern About A Pupil's Welfare

When the DSL is notified of any concerns about a pupil's welfare, they will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services.

Factors that the DSL should bear in mind when making their decision include:
- the best interests of the child
- the nature and seriousness of the concern
- the referral threshold set by the Local Safeguarding Board
- the child's wishes or feelings
- the inter-agency procedures of the Local Safeguarding Board
- where relevant, local information sharing protocols relating to Channel referrals.

If the DSL decides not to make a referral, but to support the pupil with community-based early help, the DSL will keep the situation under review and consider a later referral to children's social services will be made if the pupil's situation does not appear to be improving.
Members of the DSL team are responsible for maintaining written safeguarding records once an issue has been logged on CPOMS . These records are confidential and the only personnel within the School who have access to them are the DSL/DDSLs.

Such records will include:
- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any actions taken, decisions reached and the outcome.

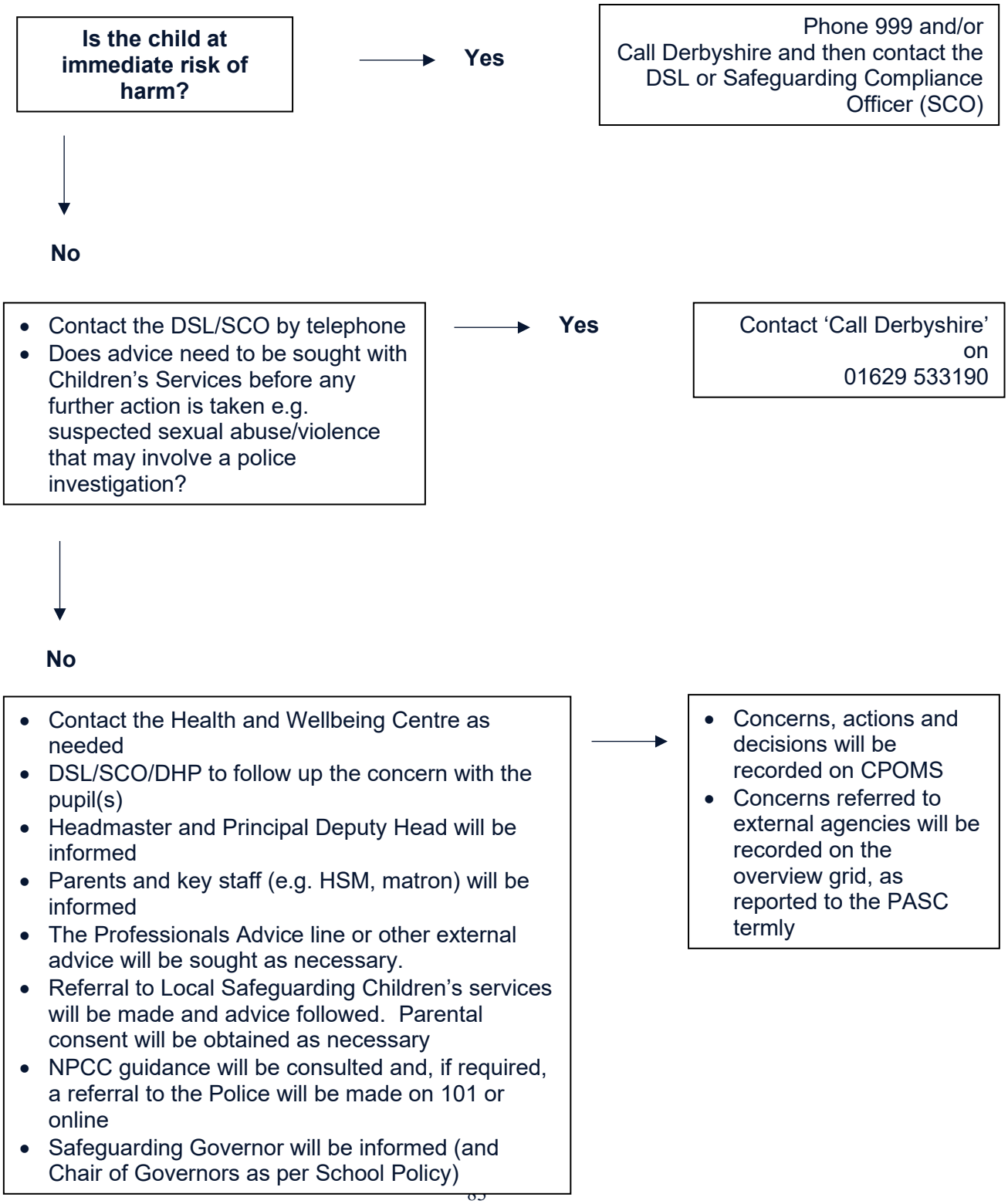
Making a referral to children's social services

When a pupil is not considered at risk of harm, but still has an unmet need, a referral should be made as soon as possible to Children's Social Care Services in the local authority in which the pupil lives. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency early-help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

The categories of significant safeguarding concerns are:
- Self-harm or suicidal thoughts/ideation
- Child on child abuse (physical, online, emotional, harassment)
- Sexual violence, abuse or harassment
- Sexual activity (in or out of school if one or both is under 16)
- Prevent / radicalisation / extremism concerns
- Online safety concerns – bribery, making or sharing of nude images (including AI-generated images), scams, threats/harassment
- Significant substance abuse (alcohol, vaping, drugs)
- Domestic violence / abuse

Other concerns that would involve communications/referrals with external agencies include eating disorders/disordered eating and children missing education because of mental health illnesses or problems.

Flowchart of Actions



Appendix 8 – Low Level Concerns Policy

Low-level Concerns Policy (including self-reporting)

The overarching aim of the School's Low-level Concern Policy is to facilitate a safeguarding culture in which the values and expected behaviours which are set out in our Staff Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff feel able to raise any low-level concern, whether about their own or a colleague's behaviour
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining confidence that concerns will be handled promptly and supportively whilst, protecting staff from false allegations or misunderstandings.

What is a low-level concern, including those that are self-reports?

Our Safeguarding and Child Protection Policy and Procedure aspires to the highest standards of conduct and behaviour. A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult working in or on behalf of the School, may have acted in a manner inconsistent with the school's Staff Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children. It may include a self-report or a report about someone else. Staff do not have to decide whether the behaviour in question constitutes a low-level concern; it is sufficient that they believe it to be a low-level concern. That determination will be made by the DSL (Designated Safeguarding Lead - Sally Lees) and the SCO (Safeguarding Compliance Officer), as appropriate.

Where a staff member wishes to work outside of the normal classroom situation/school day with a specific pupil, (extra 1:1 lessons either in person or online for example) they should first seek agreement with the Housemaster/mistress, provide details and log a written request and confirmation. Specific arrangements for Music, Sport (e.g. winter 1:1 nets) will be accounted for in individual risk assessments.

Where a staff member wishes to work outside their contract with a specific pupil, (tutoring for example) they should first seek agreement with the Headmaster and a written confirmation placed in their employee file.

Self-reporting low-level concerns

From time to time an individual may find themselves in a situation which might give rise to a concern. Equally, an individual may for whatever reason have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived by the child or others. As such, the School sees self-reporting as an important means of maintaining a safeguarding culture where everyone learns.

What should I do if I have a low-level concern?

Where a low-level concern (including self-reports) is noted, it should be reported to the DSL as soon as reasonably possible on the same day as the incident (where the concern relates to a particular incident) or as soon as the concern is identified, either verbally or in writing. Alternatively, if preferred, a concern could be reported directly to the Headmaster, for example if the concern relates to the DSL. Where the concern is about the Headmaster, this should be reported to the Chair of Governors.

The DSL can be contacted on SLees@repton.org.uk or 01283 559391 (Safeguarding Office). The MS form to report low-level concerns can be found as a link on the IT homepage and the AllStaff Team. Please contact theClerk to the Governors) on clerk@repton.org.uk or send a letter if you would like to get in touch with the Chair of Governors.

How will my low-level concern be handled (including self-report)?

The DSL will discuss all low-level concerns they receive with the Principal Deputy Head (PDH) on the same day as the concern was raised. A decision will be made, in the first instance, that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure. Where the DSL is in any doubt whatsoever, advice will be sought from the LADO, if necessary on a no-names basis.
The circumstances in which a low-level concern might be reclassified as an allegation are where:

- the threshold is met for an allegation; (see Repton Safeguarding and Child Protection Policy)
- there is a pattern of low-level concerns which collectively amount to an allegation;
- there is other information which, when taken into account, leads to an allegation.

Having established that the concern is low-level, the DSL and the PDH will usually discuss it with the individual who has raised it and would then take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc. The person about whom the concern has been raised will normally be informed of any concern raised about them once all risk has been identified and assessed. They will usually be invited to discuss the concern and the DSL will evaluate the information and decide on next steps, if any. The DSL will be the ultimate decision maker in respect of all low-level concerns, in consultation with the Headmaster, as appropriate. The person who has raised the low-level concern about their colleague will remain anonymous unless circumstances are exceptional. They will be given an assurance that their concern will be responded to and will be logged but will not be given

any detail about subsequent action.

If a concern is raised to the Chair of Governors, they will usually discuss the concern with the Safeguarding Governor before taking further steps to investigate as necessary. Where it is felt necessary further expert advice may be sought to determine the appropriate steps and actions necessary. The person who has raised the low-level concern about their colleague will remain anonymous unless circumstances are exceptional. They will be given an assurance that their concern will be responded to and will be logged but will not be given any detail about subsequent action.

What records will be kept?

Where a low-level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept in a central low-level concern file, separate to HR records, which logs all low-level concerns and will be retained until the staff member leaves the School's employment. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- the concern (or group of concerns) has been reclassified as an allegation; or
- the concern (or group of concerns) is sufficiently serious to result in formal action under the School's grievance, capability or disciplinary procedure.

Appendix 9 – 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 and, videos

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/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 department 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 and the form which gives consent to the School to obtain and use photographs and/or images of pupils for promotional, press and educational purposes.
- It will always be possible for parents to contact the School to request removal of images or videos from our marketing materials and/or social media.

Version History/Amendments			
Date	**Author**	**Comment/Amendment**	**Version No**
05.08.24	DLC	Reformatting of policy	1.0
30.08.24	SJL	Review of policy with updates	2.0
01.09.24	DLC	Formatting of policy	2.1
04.09.24	DLC	Formatting	2.2
04.09.24	DLC	Formatting/Table Amendment	2.3
26.11.24	SJL	Minor updates to App 13 and Parental Photography	2.4
05.02.25	SJL	Inclusion of new anonymous reporting system	2.5
01.09.25	SJL	Review of policy with updates	2.6
27.01.26	SJL	Changes of staff and Independent Person role	2.7
16.04.26	SJL	Minor changes to update the references to the updated statutory guidance of WTSC 2026 and the revised guidance around Restrictive Interventions, including reasonable force.	2.8
27.07.26	SJL	Annual review. Updates following KCSIE 2026	3.0

Links to Other School Policies
Acceptable IT Use Policy
Allergy Management Policy
Anti-Bullying Policy
Attendance Policy
Drug & Substance Misuse Policy
Health & Safety Policy Statement
Online Safety Policy
Parental Photography of Pupils Policy
RSHE Policy
Pupil Behaviour Management Policy
Statement of Boarding Principles
Pupil Supervision and Safety Policy
Visitor, Volunteer, Contractor and Visiting Speakers Policy
Wellbeing Policy
Equal Opportunities and EDIB Policy (includes guidance on LGB and gender-questioning)
Admissions Policy
Boarding Statement
Guardianship Policy and Emergency Guardianship Policy
Missing Pupils Protocol
The School Rules
Staff Employment Handbook & Staff Code of Conduct
Relationships in Boarding Policy

Links to External Policies, Legislation or Guidance

- Keeping Children Safe in Education 2026: Keeping children safe in education 2026 (comes into force from 1 September 2026)

- Working Together To Safeguard Children 2026: Working together to safeguard children 2026: a guide to multi-agency working to help, protect and promote the welfare of children
-
- 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

- Mental Health issues affecting a child's attendance Mental health issues affecting a pupil's attendance: guidance for schools - GOV.UK (www.gov.uk)

- Working together to improve school attendance (applies from 19 August 2025) (publishing.service.gov.uk)

- Children Missing Education - Guidance for Local authorities (publishing.service.gov.uk) August, 2025

Behaviour in Schools - Advice for headteachers and school staff Feb 2025 (publishing.service.gov.uk)

Restrictive interventions, including use of reasonable force, in schools- fhttps://assets.publishing.service.gov.uk/media/6943dad6501cdd438f4cf5aa/Restrictive_interventions_including_use_of_reasonable_force_in_schools.pdf
Information sharing: DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people,parents and carers (publishing.service.gov.uk) May 2024

Disqualification under the Childcare Act 2006: Disqualification under the Childcare Act 2006 - GOV.UK (www.gov.uk)

Extremism and Radicalisation:
- The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)
- https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation
- Prevent duty guidance: Guidance for specified authorities in England and Wales (publishing.service.gov.uk)

Online Safety
- Further information from Child Exploitation Online Protection Centre (CEOP)

provides updated guidance and Searching screening and confiscation advice for schools. https://www.ceop.police.uk/Safety-Centre/

- Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk)
- The UK Council for Child Internet Safety (UKCCIS) Education Group has published advice for schools and colleges on responding to 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/
- Safer working practices 2022 Professional and Personnel Relationships (saferrecruitmentconsortium.org)