



**ST JOHN'S SCHOOL**  
SIDMOUTH, UNITED KINGDOM

# Child Protection and Safeguarding Policy

Policy reviewed	22 July 2025
Next review date	August 2026

## Key Personnel - School

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*\*Out of hours contact details will be made available to staff*

### DEVON COUNTY COUNCIL CONTACTS

**Early Help, Consultation and Enquiries (Multi-Agency Safeguarding Hub - MASH) please contact:**

Telephone: **0345 155 1071**

Email: [Local Authority Safeguarding Hubsecure@devon.gov.uk](mailto:Local Authority Safeguarding Hubsecure@devon.gov.uk)

Request for Support available at:

[DCC - Request for support \(dcsenterprises.com\)](https://dcsenterprises.com)

**Emergency Duty Team** out of hours **0345 6000 388**

**Police** non-emergency 101

Professional Safeguarding Consultation line: (01392) 388428

**For all LADO enquiries** Exeter (01392) 384964

[ladosecure-mailbox@devon.gcsx.gov.uk](mailto:ladosecure-mailbox@devon.gcsx.gov.uk)

Further info: <https://new.devon.gov.uk>

[Managing allegations - Devon Children and Families Partnership \(dcfp.org.uk\)](https://dcfp.org.uk)

### Early Help Team

Senior Manager: Sarah Hunt

Early Help Locality Contact information:

[Early Help Locality Contact Information - Devon Children and Families Partnership \(dcfp.org.uk\)](https://dcfp.org.uk)

Locality Early Help Mailbox

North: [earlyhelpnorthsecure-mailbox@devon.gov.uk](mailto:earlyhelpnorthsecure-mailbox@devon.gov.uk)

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For emergencies outside of office hours please call: 0345 600 0388

<b>CHILD PROTECTION AND SAFEGUARDING POLICY</b>	
Subject	Page
1. Safeguarding Statement	4
2. Terminology	4
3. Safeguarding Legislation and Guidance	5
4. Policy Principles, Aims and Values	6
5. Roles and Responsibilities	8
6. Recognising and Responding to Safeguarding Concerns	13
7. Children Who Are Particularly Vulnerable	19
8. Whistleblowing	20
9. Allegations Against Staff	21
10. Physical Intervention	23
11. Confidentiality, Information Sharing and GDPR	24
12. Policy Links	26
<b>APPENDICES</b>	
App 1. Categories of Abuse	27
App 2. Anti-Bullying / Cyberbullying	30
App 3. Racist Incidents	30
App 4. Radicalisation and Extremism	31
App 5. Domestic Abuse (including Operation Encompass)	33
App 6. Exploitation (including CSE, CCE and County Lines)	34
App 7. Female Genital Mutilation	36
App 8. Forced Marriage	38
App 9. Honour Based Abuse	39
App 10. One Chance Rule	40
App 11. Mental Health	40
App 12. Private Fostering Arrangements	42
App 13. Looked After Children & Previously Looked After Children	43
App 14. Children Missing Education	44
App 15. Child on Child Abuse (incl Sexual Violence, Sexual Harassment and HSB)	44
App 16. Online Safety	47
App 17. Youth Produced Sexual Imagery (Sexting)	47
App 18. Additional Considerations for Residential and Boarding Pupils (NMS)	49
App 19. Additional Resources	50

# Child protection and Safeguarding policy

## 1. Safeguarding Statement

St John's School recognises our moral and statutory responsibility to safeguard and promote the welfare of all pupils, including those who board and those in the EYFS. We expect all staff, governors and volunteers to share this commitment.

We recognise that all children, regardless of age, disability, SEND, gender reassignment, race, religion or belief, sex or sexual orientation, have an equal right to protection from all types of harm or abuse, including harm that may occur online or through technology.

We aim to provide a safe, supportive and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow clear procedures to ensure children receive timely, effective support, protection and justice.

We listen to our pupils and take seriously what they tell us. Pupils are made aware of the adults they can talk to if they have a concern. Where there are concerns about a child's welfare, we may need to share information and work in partnership with other agencies.

We will ensure concerns are discussed with parents or carers, unless we believe that doing so would put the child at risk.

This Child Protection and Safeguarding Policy underpins and guides all safeguarding procedures and protocols at St John's. It applies to all pupils, including those in the EYFS, and applies whenever staff or volunteers are working with or interacting with children, including when offsite (e.g. during school visits).

We recognise that children with a social worker may face additional challenges and barriers, and we are committed to providing additional support as needed.

We pay due regard to Part 5 of *Keeping Children Safe in Education 2025* when dealing with child-on-child abuse, including sexual violence and sexual harassment.

This policy also reflects our commitment to meeting the requirements of the *National Minimum Standards for Boarding Schools (2022)* and the *Statutory Framework for the EYFS (2025)*.

## 2. Terminology

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge, identifying concerns early, and ensuring timely and appropriate responses
- protecting children from maltreatment, including harm that may occur within the home or in extra-familial settings, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. When the term “staff” is used within this policy, it applies to all adults within the school community, including governors, supply and self-employed staff, contractors, volunteers, students and those on work experience.

A child refers to anyone under the age of 18. The school also recognises that care leavers may require continued support up to the age of 25.

Parents refers to birth parents and other adults in a parenting role, including step-parents, foster carers, adoptive parents and local authority corporate parents.

The school acknowledges that some children may be particularly vulnerable to harm due to additional needs, disability, past trauma, mental health difficulties or complex family circumstances.

### **3. Safeguarding Legislation and Guidance**

The following legislation and statutory/non-statutory guidance has been considered in the development of this policy:

- Education (Independent School Standards) (England) Regulations (2014)
- Working Together to Safeguard Children (DfE, 2023; updated February 2024)
- Keeping Children Safe in Education (DfE, September 2025)
- EYFS Statutory Framework (DfE, 14 July 2025; effective 1 September 2025)
- Working Together to Improve School Attendance (DfE, May 2022; updated August 2024)
- Prevent Duty Guidance: for England and Wales (HM Government, 2023)
- Teachers’ Standards (DfE, 2011; reviewed 2021)
- Information Sharing: Advice for Practitioners Providing Safeguarding Services (DfE, 2024)
- What to do if you’re worried a child is being abused: Advice for Practitioners (HM Government, March 2015)
- Filtering and Monitoring Standards for Schools and Colleges (DfE, October 2024 and March 2024 updates)
- Searching, Screening and Confiscation: Advice for Schools (DfE, July 2024)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education: Statutory Guidance (DfE, 2019; updated July 2025)
- Promoting and Supporting Mental Health and Wellbeing in Schools and Colleges (DfE, updated July 2025)
- Disqualification under the Childcare Act 2006: Statutory Guidance (DfE, September 2018)
- Teaching Online Safety in Schools (DfE, 2023)
- Mental Health and Behaviour in Schools: Departmental Advice (DfE, November 2018)
- Equality Act 2010: Advice for Schools (DfE, updated 2018)
- Police and Criminal Evidence Act (PACE) Code C (Home Office, 2019)
- National Minimum Standards for Boarding Schools (DfE, 2022)
- Children Missing Education: Statutory Guidance for Local Authorities (DfE, 2016)
- Serious Violence Strategy (Home Office, 2018)
- Cyber Security Standards for Schools and Colleges (DfE, 2024)
- Local policies and procedures issued by the Devon Safeguarding Children Partnership (2025)

## 4. Policy Principles, Aims and Values

### The welfare of the child is paramount:

- All children, regardless of age, disability, special educational needs, gender reassignment, race, religion or belief, sex, sexual orientation or background, have equal rights to protection, safeguarding and access to opportunity.
- All staff have a duty to protect children from harm and share an equal responsibility to act on any suspicion, disclosure or concern that may suggest a child is at risk of harm, including harm that may occur online or outside the home.
- All staff aim to provide a caring, positive, safe and stimulating environment that promotes each child's social, emotional, physical, and mental wellbeing, as well as their moral development.
- Pupils and staff involved in safeguarding concerns will receive appropriate support, supervision and guidance to ensure their wellbeing and effective safeguarding practice.

### This policy aims to:

- Ensure that all staff are aware of their responsibilities to safeguard and promote the welfare of children
- Ensure that staff follow the procedures in this policy if they suspect a child may be experiencing, or at risk of experiencing, harm
- Ensure that all staff are aware of the need to report concerns about the conduct of any member of staff, volunteer or visitor, including low-level concerns
- Ensure that the Designated Safeguarding Lead (DSL) and Deputy DSLs use appropriate assessments, resources and agency support to respond to concerns effectively
- Provide an environment where children feel safe, secure, valued and respected, and where they are confident they will be listened to
- Raise awareness that abuse may occur in the home or in extra-familial contexts, and may be perpetrated by adults or by other children
- Demonstrate the school's safeguarding commitment to pupils, families and external partners
- Monitor the welfare of children known or thought to be at risk of harm in a consistent and systematic way
- Promote high levels of communication between staff, the DSL/DDSL and external safeguarding partners, including contributions to assessments, referrals and multi-agency plans
- Develop strong working relationships with partner agencies, particularly Children's Social Care, the police and health services
- Support children's development in ways that foster security, confidence and independence
- Be alert to risks online, including emerging risks such as generative AI, and ensure that filtering and monitoring systems are in place to keep children safe
- Ensure all staff are recruited safely in accordance with Part 3 of KCSIE 2025, and that a compliant single central record is maintained
- Set clear expectations for staff conduct and professional boundaries, including lone working and reporting of concerns about colleagues

### **Supporting and Protecting Children:**

- We recognise that children who are being abused, exploited or neglected may not feel ready or know how to disclose what is happening to them. They may feel helpless or humiliated, or may not recognise their experiences as harmful.
- We understand that children's behaviour may vary widely in response to trauma or abuse. It may appear as anxiety, withdrawal, aggression or signs of poor mental health. Staff are trained to consider whether behavioural changes may indicate a safeguarding concern.
- We also recognise the impact that harm, particularly extra-familial harm, can have on a child's mental health, behaviour and ability to engage in education.
- School provides a safe, stable and supportive environment for all children, especially those at risk of harm. Trusted relationships between pupils and staff play a crucial role in helping to prevent harm and in supporting disclosure.

### **Our school will support all children by:**

- encouraging self-esteem and self-assertiveness through both the curriculum and relationships, while not condoning aggression or bullying (including cyberbullying)
- promoting a caring, safe and positive environment, and providing children with clear lines of communication with trusted adults, supportive friends and an ethos of protection
- responding sympathetically to any requests for time out or emotional regulation in response to anxiety or distress
- offering access to helplines, counselling services and other forms of external support where appropriate
- liaising and working collaboratively with other settings, professionals and external agencies involved in the safeguarding and wellbeing of children
- supporting pupils who may need Early Help, including through referral to services beyond Children's Social Care, such as Child and Adolescent Mental Health Services (CAMHS)
- notifying Children's Social Care without delay where a concern meets the local threshold for statutory intervention
- ensuring that child protection records are transferred securely and confidentially to a child's next school or setting, including relevant medical and pastoral records
- teaching children to understand and manage risk through our Personal, Social, Health and Economic (PSHCE) education and Relationships and Sex Education (RSE), and through all areas of school life, including online safety
- identifying and supporting children with emerging mental health needs, using recognised guidance, resources and tools, and making timely referrals to specialist services where needed
- reassuring victims that they will be listened to, taken seriously and kept safe and that they will be supported throughout the process

### **The school community will protect children by:**

- establishing and maintaining an ethos where children feel safe, are encouraged to speak openly, and are confident they will be listened to
- having clear systems in place that make it easy for children to report concerns, and ensuring every pupil knows which trusted adults they can approach if they feel worried or unsafe

- regularly consulting with pupils, parents and staff and actively gathering and responding to their voices
- embedding safeguarding across the curriculum to equip children with the skills they need to stay safe and seek help when needed. This includes age-appropriate teaching on anti-bullying, child-on-child abuse (including sexual violence, sexual harassment and consent), relationships and sex education (RSE), online safety, road safety, pedestrian and cycle safety
- providing targeted safety activities and pastoral input for key transitions, such as preparing pupils for greater independence and personal safety as they move into new settings or key stages
- adopting a whole-school approach to preventing harmful sexual behaviour through PSHCE and RSE, staff training, a clear behaviour policy and a safeguarding culture where pupils feel safe to speak up without fear
- ensuring all staff, pupils and parents understand the school's expectations around the safe use of technology, including mobile devices and social media, and the potential safeguarding risks associated with online behaviour
- identifying and supporting children with emerging mental health needs, including through Early Help and referrals to external services where appropriate, in line with *KCSIE 2025* guidance
- considering ways to enable children to raise concerns in a range of ways, including anonymously if needed, to ensure every child feels heard

## 5. Roles and Responsibilities

### Responsibility of the Proprietor:

The proprietor ensures that safeguarding and child protection are central to the school's culture and practice, and that all arrangements reflect statutory responsibilities under Keeping Children Safe in Education 2025, the EYFS Framework (2025) and the National Minimum Standards for Boarding Schools (2022).

### Policy & Strategic Oversight

- Safeguarding underpins all relevant aspects of school policy and procedure, always acting in the best interests of pupils, including boarders and EYFS children
- There is an effective Safeguarding and Child Protection Policy in place, consistent with statutory guidance and available publicly on the school website
- The policy is reviewed at least annually (or sooner following significant changes or incidents), and includes an evaluation of effectiveness
- There is a named governor with lead responsibility for safeguarding who has the skills and knowledge to carry out the role effectively
- Other key policies are in place and up to date, including: Behaviour, Anti-Bullying, RSE, Digital Usage, and Safer Recruitment
- An effective Staff Code of Conduct is in place and consistently applied, including expectations for online conduct and behaviour outside of school
- Governors receive annual reports on the effectiveness of safeguarding, including oversight of online filtering and monitoring systems, in line with the DfE's 2024 standards



- Any weaknesses in safeguarding practice or compliance are identified and addressed without delay

### **People & Training**

- A senior leader is appointed as the Designated Safeguarding Lead (DSL), with at least one trained Deputy DSL in place
- The DSL and DDSLs complete advanced safeguarding training (Level 3 or equivalent) every two years, as per local requirements
- All staff complete safeguarding training at induction and receive updates at least annually
- At least one member of each recruitment panel has up-to-date safer recruitment training
- Safer recruitment procedures are in place in line with Part 3 of KCSIE 2025, including pre-employment checks and maintenance of a Single Central Record (SCR)
- A referral is made to the DBS where required, and to the Teaching Regulation Agency (TRA) if appropriate
- The school has procedures for managing low-level concerns and all allegations against staff, including those relating to supply staff, volunteers and contractors

### **Procedures & Systems**

- Child protection records are maintained accurately, including clear chronologies and rationales for decisions taken
- The school holds at least two emergency contact numbers for each pupil wherever reasonably possible
- Procedures are in place for pupils who go missing from education, including liaison with the local authority as required
- The school meets or exceeds the safeguarding-related requirements of the National Minimum Standards for Boarding Schools (2022)
- There are clear policies and procedures regarding the use of mobile phones, cameras and digital devices in EYFS settings

### **Curriculum, Online Safety & Pupil Voice**

- Children are taught about safeguarding (including online safety) through a broad and balanced curriculum, adapted to their needs and vulnerabilities
- The school ensures all staff, pupils and parents understand expectations regarding safe use of technology, including social media
- Appropriate filtering and monitoring systems are in place to block harmful content without unnecessarily limiting access to educational materials
- These systems are understood by leadership and staff, reviewed regularly for effectiveness, and concerns are escalated when required

### **The Head of School:**

The Head of School has a central role in ensuring safeguarding is embedded across the school's culture, processes and day-to-day operations. Responsibilities include:

- Promoting a whole-school culture of safeguarding where the best interests of the child are at the centre of all decision-making

- Ensuring that the school's Safeguarding and Child Protection Policy is implemented effectively and followed by all staff
- Ensuring that the DSL and deputy DSLs have sufficient time, training, support and resources to carry out their roles effectively, including appropriate cover arrangements where needed
- Ensuring that systems are in place which are accessible and easy for children to use, enabling them to report concerns (including abuse) confidently
- Ensuring pupils are given regular opportunities to share their views and feedback through mechanisms such as surveys, school council or drop-in sessions
- Taking account of children's wishes and feelings when determining what action to take and what services to provide
- Ensuring that all staff feel able to raise concerns, including concerns about poor or unsafe practice, and that such concerns are handled sensitively and in accordance with the school's Whistleblowing Policy
- Following procedures and liaising with the Local Authority Designated Officer (LADO) without delay in relation to concerns or allegations involving staff or other adults, including behaviour outside of school which may indicate unsuitability to work with children
- Referring individuals who pose a risk of harm to children to the Disclosure and Barring Service (DBS), and the Teaching Regulation Agency (TRA) where appropriate
- Ensuring safeguarding, including online safety, is taught throughout the curriculum in an age-appropriate and relevant way
- Monitoring the effectiveness of safeguarding arrangements in liaison with the Senior Leadership Team and Proprietor, and addressing any identified weaknesses without delay
- Ensuring that the safeguarding and welfare of boarding pupils is consistent with the National Minimum Standards for Boarding Schools (2022), and that policies are reviewed and updated in line with these standards

#### **The Designated Safeguarding Lead (DSL):**

- Promote a whole-school culture of safeguarding, ensuring that the welfare and best interests of children are embedded in all systems and processes
- Be available during school hours to respond to concerns, offer guidance and lead safeguarding activity
- Ensure the Head of School and Safeguarding Governor are kept informed about significant safeguarding concerns and any referrals made
- Act as the named point of contact with safeguarding partners, lead on liaison with external agencies and provide support, advice and challenge to school staff
- Understand and act on statutory child protection processes, including Section 17 (Child in Need), Section 47 (Child Protection) and Early Help, making prompt decisions and referrals as appropriate
- Manage safeguarding records, ensuring accurate, timely and detailed chronologies are kept for all concerns, including those not escalated to other services
- Make referrals to external agencies as needed, including Children's Social Care, the Channel programme and the police
- Liaise with the local Channel Panel when there are concerns a pupil may be vulnerable to radicalisation

- Lead on online safety with the support of the IT Manager, including understanding the school's filtering and monitoring systems and conducting an annual audit to evaluate their effectiveness
- Inform parents and carers about the platforms, software and digital tools children are asked to access, in line with *DfE guidance (2023)*
- Promote early identification of mental health concerns and ensure pupils are considered for Early Help and support in line with *KCSIE 2025*
- Monitor safeguarding arrangements within the boarding/residential provision and ensure full compliance with relevant *National Minimum Standards (2022)*
- Ensure safeguarding training is delivered as follows:
  - Maintain up-to-date knowledge and skills through regular training (minimum every two years)
  - Ensure all staff, including temporary staff and volunteers, receive appropriate safeguarding induction and refresher training
  - Maintain a training programme for all staff and volunteers, in line with Devon SCP guidance
  - Ensure staff have read KCSIE Part 1 (or Annex A) and Annex B, and provide mechanisms to support understanding and application of these responsibilities
- Ensure safeguarding and child protection information is shared appropriately during transitions:
  - Transfer CP files to new settings within five school days, separately and securely from academic records
  - Ensure safeguarding records are obtained from previous schools or nurseries within five school days of a pupil's arrival
  - Share relevant safeguarding and contextual information (e.g. attendance patterns, interventions, or concerns) with the new setting
- Take lead responsibility for the welfare, support and educational achievement of pupils who are Looked-After or previously Looked-After
- Ensure there are clear and accessible systems for pupils to report concerns and give feedback about their wellbeing or safety
- Report annually to governors on the effectiveness of online filtering and monitoring, in line with the *DfE's Filtering and Monitoring Standards (2024)*
- Conduct and document an annual review of filtering and monitoring arrangements, reporting outcomes to the Governing Board

#### **The Deputy Designated Safeguarding Leads (DDSLs):**

Deputy Designated Safeguarding Leads are trained to the same level as the Designated Safeguarding Lead and are able to carry out all delegated safeguarding duties.

In the absence of the DSL, a DDSL will take responsibility for safeguarding arrangements to ensure the safety and protection of pupils continues without disruption. In the case of a long-term absence, one deputy will assume overall safeguarding leadership, supported by others as required.

While the DSL may delegate specific safeguarding responsibilities to deputies, the lead responsibility for child protection remains with the Designated Safeguarding Lead at all times, and cannot be delegated.

**Staff:**

All staff have a duty to safeguard and promote the welfare of children. They are expected to be proactive, professionally curious and confident in identifying, recording and reporting concerns. Staff must uphold the principles of Keeping Children Safe in Education (2025) and other relevant guidance.

Staff will:

- Maintain an attitude of *“it could happen here”* when considering potential safeguarding concerns
- Exercise professional curiosity, recognising the signs and indicators of abuse, neglect, exploitation or poor mental health
- Identify concerns early, provide help and support, and take action to prevent issues from escalating
- Provide a safe, supportive learning environment where children feel valued and listened to
- Educate pupils on how to manage risk, stay safe and seek help, including online safety
- Know how to respond if a child discloses abuse, and be able to reassure them that they will be taken seriously and supported
- Recognise the barriers children may face in making a disclosure, including communication difficulties, fear of consequences, or not recognising their experiences as abuse
- Understand that a lack of reported child-on-child abuse (or any other abuse) does not mean it is not occurring
- Identify pupils who may benefit from Early Help and understand how to take part in support plans and multi-agency working
- Follow the school’s safeguarding policy and procedures when raising a concern
- Be familiar with local referral processes and be prepared to support social workers and other professionals involved in a case
- Uphold the School’s Code of Conduct and adhere to the *Teachers’ Standards (2012)*, which require all staff to safeguard children’s wellbeing and maintain public trust in the profession
- Be aware of the school’s safeguarding systems and policies, including those for child protection, anti-bullying, behaviour, children missing education (CME), filtering and monitoring, and the use of CPOMS or equivalent recording tools
- Attend regular safeguarding and child protection training, and read Part 1 (or Annex A) and Annex B of *KCSIE 2025* as required
- Recognise that children missing from or absent from education may be experiencing harm, including neglect, exploitation or abuse
- Report any concerns about the conduct of adults (including low-level concerns) to the Head of School, including behaviour outside school that may suggest a risk to children
- Understand and uphold safeguarding responsibilities in accordance with the *National Minimum Standards for Boarding Schools (2022)*, where applicable

- Be aware of factors that may increase a child's vulnerability to harm, including bereavement, exclusion, homelessness, domestic abuse or previous trauma
- Challenge decisions or delays where they feel a child is not being adequately protected, escalating concerns where necessary

## 6. Recognising and Responding to Safeguarding Concerns

### Recognising:

Any child, in any family, in any school, could become a victim of abuse. Staff should always maintain an attitude of *"It could happen here."*

Abuse, neglect and safeguarding concerns are rarely isolated incidents. They are complex, often overlapping, and may present in subtle or confusing ways. Staff understand that multiple forms of harm may co-exist and that safeguarding issues are not always easy to categorise.

**Abuse and neglect** are forms of maltreatment. A child may be harmed by someone inflicting abuse or by someone failing to act to prevent harm. Harm can include emotional or psychological ill treatment, not just physical injury. Witnessing the abuse of others, for example, domestic abuse also causes harm.

Children may be abused by adults or by other children, and abuse may take place within the family, in schools, online, in the community or by people the child knows. Abuse may take place wholly online, or online activity may be used to facilitate abuse in person.

Staff are also alert to behaviours linked to **substance misuse**, **truancy**, and **youth produced sexual imagery (sexting)**, which may place children at increased risk.

Abuse can happen both offline and online, and children can also abuse others through technology. This may include:

- Abusive, harassing, or misogynistic/misandrist messages
- Non-consensual sharing of indecent images, particularly in group chats
- Sending or showing pornography to others without their consent

Further information about the four categories of abuse — *physical, emotional, sexual and neglect*, including both familial and contextual forms — can be found in **Appendices 1–17** and *Keeping Children Safe in Education 2025* (Part 1, Annex A and Annex B).

The school also recognises a number of specific safeguarding risks that may affect our pupils:

<ul style="list-style-type: none"> <li>• child missing or absent from education</li> <li>• child missing from home or care</li> <li>• child sexual exploitation (CSE), child criminal exploitation (CCE)</li> <li>• bullying including cyberbullying</li> <li>• domestic abuse</li> <li>• drugs</li> </ul>	<ul style="list-style-type: none"> <li>• gender-based violence/violence against women and girls (VAWG)</li> <li>• mental health difficulties</li> <li>• private fostering</li> <li>• radicalisation</li> <li>• youth produced sexual imagery (sexting)</li> <li>• teenage relationship abuse</li> </ul>
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<ul style="list-style-type: none"> <li>● fabricated or induced illness</li> <li>● faith abuse</li> <li>● female genital mutilation (FGM)</li> <li>● forced marriage</li> <li>● gangs and youth violence</li> </ul>	<ul style="list-style-type: none"> <li>● trafficking</li> <li>● child on child abuse</li> <li>● upskirting</li> <li>● serious violence</li> <li>● sexual harassment</li> </ul>
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Staff understand that disclosure is not always verbal. There will be occasions when a child's behaviour, mood, creative work or communication gives cause for concern. This might include unsettling stories, drawings, poetry, or changes in relationships or appearance. These concerns must not be ignored.

While such signs may reflect other life events, such as bereavement, illness, parental separation or accidents, they may also indicate abuse. In all cases, staff are encouraged to check in with the pupil by asking gentle, open questions such as "Are you OK?" or "Is there anything I can do to help?"

Concerns should be recorded on CPOMS (or the school's agreed safeguarding system), where they will be reviewed during weekly safeguarding meetings.

For further detail on types of abuse and how the school responds, please refer to the Appendices section of this policy.

App 1. Categories of Abuse
App 2. Anti-Bullying / Cyberbullying
App 3. Racist Incidents
App 4. Radicalisation and Extremism
App 5. Domestic Abuse (including Operation Encompass)
App 6. Exploitation (including CSE, CCE and County Lines)
App 7. Female Genital Mutilation
App 8. Forced Marriage
App 9. Honour based Abuse
App 10. One Chance Rule
App 11. Mental Health Difficulties
App 12. Private Fostering Arrangements
App 13. Looked After Children & Previously Looked After Children
App 14. Children Missing Education
App 15. Child on Child Abuse (incl Sexual Violence, Sexual Harassment and HSB)
App 16. Online Safety
App 17. Youth Produced Sexual Imagery (Sexting)
App 18. Additional Resources

## Responding to Safeguarding Concerns

In all cases, even if staff are unsure whether a concern is significant, they must speak to the DSL or a DDSL without delay.

After an initial conversation with the pupil, or if a concern arises in any other way, staff should immediately discuss the concern with the DSL or deputy and follow this up in writing (see Flowchart A).

All concerns, no matter how minor they may appear, must be recorded on CPOMS. This information may later provide the missing piece in understanding the wider context of a child's experience.

Staff CPOMS entries 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

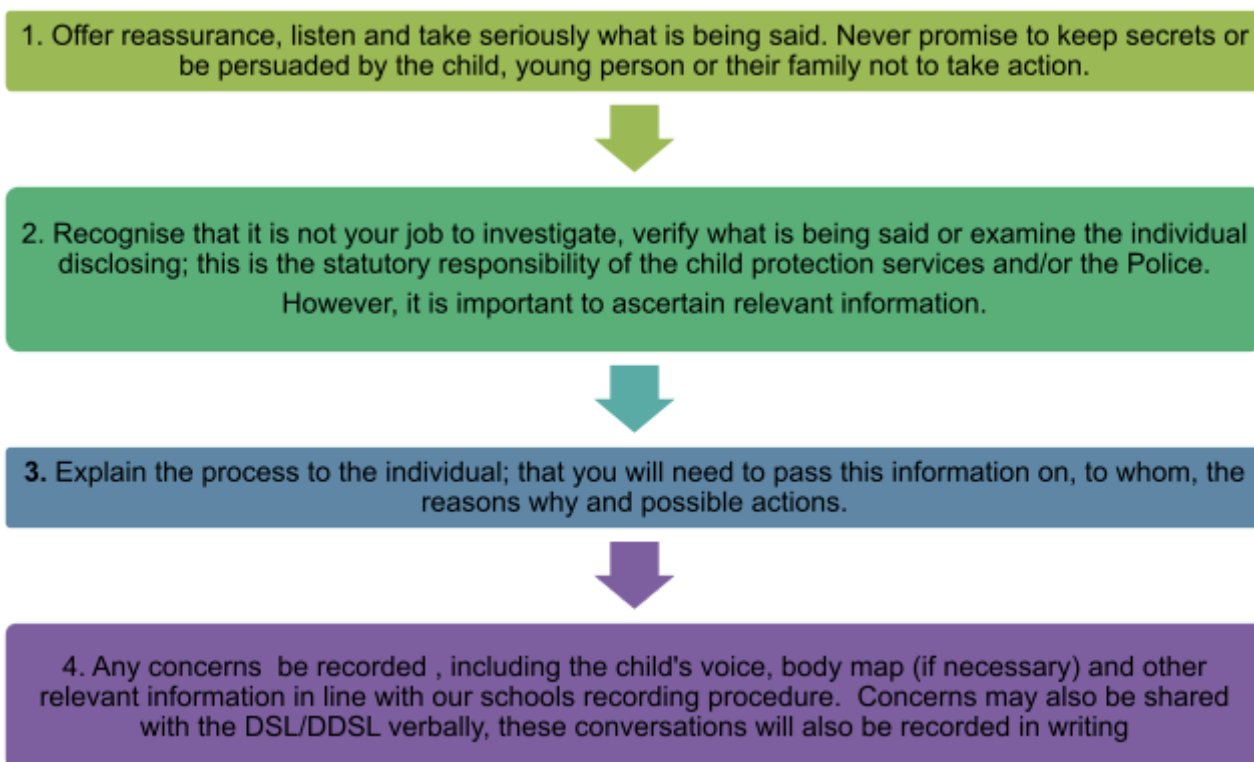
If a child begins to disclose abuse or harm, staff must follow the guidance in Flowchart A and the advice in the table below titled "Pupil making a disclosure".

All reports of child-on-child abuse, including sexual violence and sexual harassment, will be:

- taken seriously
- never dismissed as "banter", "just having a laugh" or "part of growing up"
- responded to in line with KCSIE 2025 and the school's safeguarding policy

Where a child is at immediate risk of harm, or if a crime may have been committed, staff will take urgent action in line with school procedures and, where necessary, the DSL will make an immediate referral to Children's Services or the police.

#### FLOW CHART A



#### **If a pupil discloses to a member of staff**

We recognise that disclosing abuse is incredibly difficult for a child. It often takes immense courage. They may feel:

- ashamed, guilty or frightened
- confused about what has happened



- fearful that something bad will happen if they tell
- responsible for the abuse
- unable to trust adults

In some cases, the child may not even realise that what they have experienced is abuse.

A pupil who chooses to disclose may later need to tell their story to multiple professionals, including police officers and social workers. For that reason, it is vital that their first experience of telling someone is a positive one.

Staff play a crucial role in this moment. Their reaction can shape how supported, safe and believed the child feels and whether they continue to engage with support services.

#### **During their conversation with the pupil staff will:**

When a pupil begins to disclose a safeguarding concern, staff must:

- Listen carefully and allow the child to speak freely, in their own time
- Remain calm and do not react with shock, disgust or disbelief — this could cause the child to stop talking
- Reassure the pupil that they have done the right thing in telling someone and that what's happened is not their fault
- Respect silences, pauses are normal and may help the child gather their thoughts
- Take the disclosure seriously, do not assume it's exaggerated or made up
- Ask open, non-leading questions (e.g. "Can you tell me more about that?") to allow the pupil to explain in their own words
- Avoid guessing, jumping to conclusions or speculating about what happened
- Do not offer physical comfort (e.g. hugs or holding hands) this may feel unsafe for a child who has experienced abuse
- Do not examine injuries or ask the pupil to undress, under no circumstances should you take photographs
- If a pupil wants to show an injury, ensure another member of staff is present as a witness and, where possible, that one of you is the same sex as the pupil
- Do not ask why the child didn't tell anyone sooner, this may cause guilt or self-blame
- Be honest about what will happen next, explain that you cannot keep the information secret and that it will be shared with the Designated Safeguarding Lead (DSL)
- Do not investigate or try to gather more information, your role is to listen, record and report
- Do not speak to other staff, pupils or parents about the disclosure, only the DSL or a DDSL should decide who is informed and what is shared

#### **Notifying Parents**

The school will usually seek to discuss any safeguarding concerns about a pupil with their parents or carers. This will be done sensitively, and in most cases, it is the DSL or a DDSL who will make contact.

However, if there is reason to believe that informing parents would increase the risk to the child, or could make the situation worse, the school will consult the Local Authority Safeguarding Hub before making contact. This is particularly relevant in cases such as familial sexual abuse.

In situations involving forced marriage or honour-based abuse, parents must not be informed if doing so could place the child at increased risk. In these instances, it may be appropriate to contact the police before taking further action.



The DSL will ensure that decisions around parental contact are made in line with statutory guidance and in consultation with relevant safeguarding agencies.

### Making a referral

Any concern or disclosure must be shared immediately with the DSL (or a Deputy DSL), who will help decide whether a referral to the Devon Children's Local Authority Safeguarding Hub is required, using the Devon Threshold Framework:

<https://www.devonscp.org.uk/training-and-resources/levels-of-need/lon-framework/>

- If the DSL is unsure whether the threshold for referral has been met, they will **consult the Local Authority Safeguarding Hub** for advice.
- If a referral is needed, it should be made **without delay and no later than the same working day**.
- While the DSL usually makes referrals, **any staff member can make a referral** if they believe it is necessary and action hasn't been taken.
- Wherever appropriate, the child (depending on age and understanding) and parents will be informed that a referral is being made — unless doing so would place the child at greater risk.
- If a child is at **immediate risk of harm or in danger**, staff should contact the Local Authority Safeguarding Hub or **police immediately**.
- If a staff member makes a referral themselves, they must inform the **DSL as soon as possible**.
- If a child's situation does not appear to improve after a referral, the DSL (or the staff member who made the referral) must **press for reconsideration** to ensure the concerns have been properly addressed.

### Recording Safeguarding Concerns

Accurate and timely recording of safeguarding concerns is essential.

- All safeguarding concerns must be logged on CPOMS, the school's secure safeguarding recording system.
- All staff have the appropriate level of access to CPOMS to report concerns. The DSL and DDSL have full access to log actions, referrals and outcomes.
- If the DSL is unavailable, concerns should be reported to the DDSL.

Where a concern arises from a conversation with or about a pupil, staff must:

- Write a detailed record of the concern as soon as possible, ideally immediately after the conversation
- Include:
  - Date, time and place of the conversation
  - Who was present
  - Exact words used by the pupil
  - A clear, factual summary of the concern, avoid vague terms like "inappropriate behaviour"
- Use names, not initials
- Stick to facts and observed behaviours, avoid personal opinion or interpretation
- Avoid note-taking during the conversation unless absolutely necessary — pupils may find it alarming

Staff should be aware that their written records:

- May form part of a statutory assessment by Children's Services
- Could be used as evidence in criminal investigations
- Must therefore be factual, objective and completed with care

If more than one staff member is involved in the incident or disclosure, each person must file a separate CPOMS report to ensure all perspectives and facts are captured.

All concerns, even those that appear minor, must be recorded. Over time, these entries may form part of a bigger picture and help identify patterns that would otherwise be missed.

### Supporting our Staff

We recognise that staff who are involved with safeguarding concerns, particularly where a child has suffered, or is at risk of suffering, harm, may find the experience distressing, emotional or overwhelming.

The school is committed to supporting staff in these situations. All staff will be:

- encouraged to speak to the DSL or a DDSL if they are feeling anxious, upset or unsure
- given the opportunity to talk through their concerns and emotional response in a supportive and confidential environment
- signposted to further support where appropriate, including supervision, peer support, mental health first aiders, occupational health or external counselling

Safeguarding is everyone's responsibility, but we recognise that the emotional impact of safeguarding work must not be overlooked.

### Vulnerable Children and Additional Safeguarding Considerations

St John's School recognises that some children are more vulnerable to abuse, neglect and contextual safeguarding concerns than others. This may include (but is not limited to) children with special educational needs and disabilities (SEND), those with medical conditions, children in care, care leavers, young carers, and those who face additional social or cultural challenges.

We understand that this increased risk often stems from **societal attitudes, unconscious bias and structural barriers in safeguarding systems**, rather than the child's individual needs or circumstances.

Staff should be particularly alert to the following:

- **Assuming** that indicators of abuse (e.g. behaviour, mood or injury) are simply related to a child's disability, without further exploration
- **Peer group isolation or bullying**, including prejudice-based bullying, which children with additional needs may experience more frequently
- The possibility that children with SEND or medical needs may be **disproportionately impacted by bullying** or abusive behaviour, even when there are **no obvious signs**
- **Communication difficulties** that can create challenges in reporting or disclosing abuse
- **Cognitive misunderstandings**, such as not being able to distinguish between fact and fiction in online content, and then imitating unsafe behaviour in school without understanding the risks

Staff must ensure that any concerns about vulnerable children are not dismissed or minimised, and that **reasonable adjustments** are made in how children are listened to, supported and protected.

**Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:**

- Is disabled or has certain health conditions and specific additional needs
- has special educational needs (whether or not they have an Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement or county lines activity
- is frequently missing from education, home or care
- has returned home from local authority care
- has experienced multiple suspensions or is at risk of permanent exclusion (including pupils in Alternative Provision or Pupil Referral Units)
- is at risk of modern slavery, trafficking, or sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in prison, or is affected by parental offending
- lives in a family environment presenting challenges such as domestic abuse, adult mental health difficulties or substance misuse
  - Staff should note that domestic abuse includes coercive control and may also involve adolescent to parent violence, both of which may require support from external agencies
- is misusing alcohol or other drugs
- is at risk of 'honour'-based abuse such as Female Genital Mutilation (FGM) or Forced Marriage
- is a privately fostered child (living with someone who is not their parent or a close relative for 28 days or more)

Staff must always act on any concerns and not assume that someone else will. If a staff member believes a child may benefit from early help, they should discuss this with the DSL as soon as possible.

## **7. Use of Technology, Cameras, Mobile Phones and Other Devices (including EYFS)**

The school recognises the safeguarding risks associated with the use of technology, including cameras, mobile phones, and online platforms. These expectations apply to all staff, volunteers, contractors, visitors, and parents, and include specific measures for EYFS settings.

### **Staff use of cameras and mobile devices**

- Staff must not take video footage or photographs of pupils except for clear, school-approved purposes.
- Wherever possible, school-owned devices should be used. If a personal device is used (e.g. on a trip), images must be:
  - uploaded to the school server as soon as possible, and

- immediately deleted from the personal device
- Images must never be shared on personal social media accounts or retained for personal use
- All permitted images are stored securely on a password-protected area of the school network, and are deleted when no longer needed
- Staff may only communicate with pupils through the school email system or pre-approved school apps (e.g. homework platforms)
- Staff mobile phones and personal devices must not be visible or used during pupil-facing time (including EYFS) unless in an emergency
- Photography or video must never take place in areas where pupils are changing or washing

#### **Parent and visitor use**

- Parents are asked to restrict photography (including mobile phones) to key public school events listed in the school calendar
- General filming in school is not permitted
- Any images captured must be for personal use only and not shared on social media
- Parents should be mindful that other parents may not wish for their child to appear in photographs
- Visitors, volunteers and contractors must not take photographs without express permission from the Head of School.

#### **Online safety and parental awareness**

- Parents are informed about the apps, websites and platforms their child will be asked to use, including who (if anyone) their child may interact with online
- Information is shared through curriculum evenings, digital newsletters, and regular communications
- The school follows DfE online safety guidance (2023) and ensures filtering and monitoring meet the latest DfE standards (2024)

#### **Use of AI tools**

- Staff and pupils must not use generative AI or other automated content tools in ways that could compromise safety, confidentiality or pupil wellbeing
- Educational AI tools may only be used with SLT approval, and their use must be monitored under the school's filtering and monitoring policies

#### **EYFS-specific note**

- In the EYFS, personal mobile phones and cameras must not be used in areas where children are present
- Devices must be stored securely and out of reach of children
- All photos taken for learning evidence or record-keeping must follow school policy and be stored on the school server

## **8. Whistleblowing**



At St John's School, we recognise that children cannot be expected to raise concerns in an environment where adults fail to do so.

All staff have a **duty to raise concerns** about the behaviour or actions of colleagues, poor or unsafe practice, or potential failures in the school's safeguarding arrangements. This includes concerns relating to the **management of child protection**, the conduct of staff, and the culture of safeguarding across the school.

Staff are encouraged to follow the school's **Whistleblowing Policy**, which outlines internal reporting procedures. If concerns relate to safeguarding practice or the conduct of staff, this may involve contact with the **Local Authority Designated Officer (LADO)**.

**Boarding staff** are reminded that they can raise safeguarding or welfare concerns using the same internal whistleblowing channels. All boarding staff receive **regular safeguarding supervision and training** in line with the *National Minimum Standards for Boarding Schools (2022)*.

If a staff member does not feel able to raise concerns internally, or if they feel their concerns have not been addressed, they can contact the **NSPCC Whistleblowing Advice Line**:

-  0800 028 0285 (open Monday–Friday, 8:00am–8:00pm)
-  [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Concerns relating specifically to the conduct of the **Head of School** should be reported directly to the **Safeguarding Governor**. Their contact details are provided at the front of this policy.

## 9. Allegations Against Staff and Low Level Concerns

At St John's School, we promote a culture of openness, trust and professional accountability, where concerns about adults working in or on behalf of the school are taken seriously and responded to promptly and appropriately.

### Reporting Concerns or Allegations

All staff have a duty to report concerns about the conduct of colleagues or other adults working in the school, including supply staff, volunteers, contractors and governors. This applies to any situation where an adult may have:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against or related to a child
- Behaved in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour outside school)

Concerns must be reported immediately to the **Head of School** (or to the **Safeguarding Governor** if the concern relates to the Head of School). Concerns may be raised in person or in writing and should be followed up in line with school policy.

No staff member should assume abuse by a colleague is not possible. Allegations must always be taken seriously, and staff must not conduct any internal investigation before informing the Head of School or LADO.

## **Role of the Local Authority Designated Officer (LADO)**

Where an allegation may meet the harm threshold, the Head of School (or case manager) will consult the **LADO** within **one working day**. This includes borderline cases where guidance is needed. The school will follow the advice of the LADO and will not take any further action without agreement.

If the allegation constitutes a possible criminal offence or risk of serious harm, the school will also make an immediate referral to **Children's Social Care** and/or the **police**.

## **Investigations and Support**

The **DSL** is responsible for ensuring the welfare of any pupil involved, while the **case manager** (usually the Head of School) will manage support for the staff member concerned. The school will act to:

- Maintain appropriate confidentiality
- Keep clear, factual records of the allegation and action taken
- Inform parents/carers of pupils involved (where appropriate and agreed with external agencies)
- Keep the individual informed and supported throughout the process
- Decide, in consultation with the LADO, whether suspension is necessary

## **Outcomes**

Each case will be concluded with one of the following outcomes:

- **Substantiated**
- **False**
- **Malicious**
- **Unsubstantiated**
- **Unfounded**

Where allegations are proven to be **malicious**, they will be removed from personnel records. All records relating to allegations will be retained in line with statutory requirements (the later of 10 years or normal retirement age of the individual).

## **Supply Staff and Third-Party Employees**

Where an allegation involves a supply teacher or contractor, the school will ensure the individual's employer is informed and involved in any investigation, working closely with the LADO throughout. The school will not cease using the individual's services without appropriate discussion and due process.

## **Referral to DBS and TRA**

If a person is removed from their role due to safeguarding concerns (or would have been had they not left), the school will make a referral to the **Disclosure and Barring Service (DBS)**. Where appropriate, a referral will also be made to the **Teaching Regulation Agency (TRA)**.

## Low-Level Concerns

All staff must be familiar with the school's **Low-Level Concerns Policy**, which outlines how to report and record any concern, however small, about an adult's behaviour that may be inconsistent with the Staff Code of Conduct.

Low-level concerns help promote a culture of transparency and early intervention and are reviewed regularly for any emerging patterns.

## Non-Recent Allegations

Any adult reporting abuse they experienced as a child will be supported and encouraged to report this to the **police**.

If a current pupil makes a non-recent allegation, the school will report this to the **LADO**, who will coordinate with Children's Services and other agencies as appropriate.



## 10. Physical Intervention

At St John's School, we recognise that there may be rare occasions where staff need to use physical intervention to keep pupils or others safe. Our approach prioritises prevention, de-escalation and the use of reasonable, proportionate and necessary force as a last resort.

- Physical intervention must only be used when a pupil is at risk of harming themselves, others or causing serious damage to property, and **only when no other safe option is available**.
- The force used must be the **minimum necessary** and for the **shortest duration** possible to achieve the desired outcome.

### Recording and Reporting

- Any use of physical intervention must be **recorded in writing** on CPOMS as soon as possible, and no later than the end of the same school day.
- A **witness statement** must also be completed where possible and the DSL and Head of School must be informed.
- Parents will be notified of any significant incident involving physical intervention, unless doing so would place the child at further risk.

### Training

- Only staff who have received suitable **positive handling or de-escalation training** are authorised to use physical intervention, except in emergency situations where immediate action is required.

### Touch in the School Setting

We understand that appropriate physical contact in certain circumstances is both **natural and beneficial**. Examples include:

- Demonstrating a technique in PE or music
- Offering reassurance to a distressed child (within clear boundaries)
- Administering first aid or supporting a pupil with personal care needs (with appropriate training and permissions)

Staff should ensure any physical contact is **age-appropriate, public, and in line with the pupil's individual needs and wishes**. Further guidance is outlined in **Section 42 of the Staff Handbook**, the **Staff Code of Conduct**, and the **school's Behaviour Policy**.

Any concerns about the use of physical intervention or touch must be reported immediately to the DSL or Head of School.

## 11. Confidentiality, Sharing Information and GDPR

St John's School understands that safeguarding children effectively requires *timely and appropriate information sharing* between professionals and agencies. In line with *Working Together to Safeguard Children (2023)* and *Keeping Children Safe in Education (2025)*, we are committed to working collaboratively and sharing information to protect children from harm.

### Key Principles

- **Safeguarding takes precedence:** Staff understand that the Data Protection Act 2018 and the UK GDPR are not barriers to sharing information where failure to do so would place a child at risk.



- **Confidentiality must never prevent action** to safeguard or promote the welfare of a child.
- **Information is shared** only with those who need to know, and on a strictly need-to-know basis.

### Staff Responsibilities

- All staff have a professional duty to share information with the DSL/DDSL where they have concerns about a child's welfare.
- Concerns should only be discussed with the DSL, Head of School or the Safeguarding Governor (if the concern involves the Head of School).
- The DSL (or appropriate lead) will determine if and how information is shared with other professionals, in line with safeguarding thresholds and inter-agency protocols.

### Informing Parents and Carers

- In most cases, the school will share safeguarding concerns with parents before making a referral to Children's Services.
- However, where doing so would place a child at greater risk of harm, or where advice from the Local Authority suggests that informing parents could compromise a criminal investigation, this step may be omitted.

### Record Keeping

- Child protection records are maintained in line with the Data Protection Act 2018, UK GDPR and relevant safeguarding guidance.
- All safeguarding files are stored securely, separately from academic records, and only accessible to designated safeguarding staff.
- When a pupil moves to a new school, their safeguarding file will be transferred to the receiving school's DSL securely, within 5 working days of the transfer. A receipt will be obtained to confirm safe delivery.
- Parental consent is not required for the transfer of safeguarding records to a new school, but parents will be informed where appropriate.

### Information Sharing Guidelines

Staff are guided by the *seven golden rules of information sharing*, ensuring that information is:

- **Necessary and proportionate** – shared only when needed to protect the child
- **Relevant** – shared appropriately for the purpose
- **Adequate** – sufficient to support decision-making
- **Accurate** – based on fact, not opinion
- **Timely** – shared promptly
- **Secure** – shared and stored safely

### Images and Data Consent

- The school will only use photographs or images of pupils in publications, on the website or in publicity materials if *written parental consent* has been obtained.
- This consent is gathered annually through the school's data collection process and reviewed regularly.

Fears about sharing information must not be allowed to stand in the way of promoting the welfare or protecting the safety of children.

## 12. Policy Links

This policy also links to our policies on:

<ul style="list-style-type: none"> <li>● Behaviour</li> <li>● Staff Handbook which includes the Staff Code of Conduct</li> <li>● Whistleblowing</li> <li>● Anti-bullying</li> <li>● Health &amp; Safety</li> <li>● Allegations against staff</li> <li>● Parental concerns</li> <li>● Children Missing from Education</li> <li>● Curriculum</li> <li>● PSHCE</li> <li>● Teaching and Learning</li> </ul>	<ul style="list-style-type: none"> <li>● Administration of medicines</li> <li>● Drug Education</li> <li>● Relationships and Sex Education</li> <li>● Physical intervention/Restraint</li> <li>● Online Safety, including staff use of mobile phones</li> <li>● Risk Assessment</li> <li>● Recruitment and Selection</li> <li>● Intimate Care (EYFS)</li> <li>● Radicalisation and Extremism</li> <li>● Data Protection/GDPR Guidance</li> </ul>
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This policy, together with its linked policies and appendices, reflects the school's compliance with the National Minimum Standards for Boarding Schools (2022) including (but not limited to) Standards 11–22. A mapping document is available to show how each standard is met through policies, procedures and practice.

NMS Standard	Where covered
Standard 11: Safeguarding and child protection	Whole policy; Roles & Responsibilities; DSL
Standard 12: Promoting positive behaviour	Behaviour Policy; Physical Intervention section
Standard 13: Staff recruitment and checks	Safer recruitment section
Standard 14–16: Care and supervision of boarders	Residential-specific additions
Standard 19: Staff training and supervision	Training & Induction; DSL section
Standard 21: Review of policies and practice	Proprietor & Head of School responsibilities

# Appendices

In addition to the information below, all staff must remember that abuse, risk factors and safeguarding concerns apply equally to children in boarding or residential settings. Safeguarding arrangements must meet the requirements of the National Minimum Standards for Boarding Schools (2022) and ensure that pupils living away from home are protected, supported and listened to, day and night.

Safeguarding in the Early Years Foundation Stage (EYFS) follows the statutory requirements set out in the EYFS Framework (2024). This includes ensuring appropriate supervision, safe use of mobile phones and devices, appropriate staffing ratios and staff training. Any child protection concerns in EYFS must be responded to in accordance with this policy, and all DSLs working with EYFS children must have specific training relevant to this age group.

Also refer to:

- Part 1 and Annex B of *Keeping Children Safe in Education (2025)*
- South West Child Protection Procedures: [proceduresonline.com](https://proceduresonline.com)

## 1. Categories of Abuse

### Categories of Abuse

- **Physical Abuse**
- **Emotional Abuse** (including domestic abuse)
- **Sexual Abuse** (including child sexual exploitation)
- **Neglect**

### General Signs That May Indicate Abuse

The following non-specific signs **do not confirm abuse**, but may suggest that something is wrong:

- Sudden or significant changes in behaviour
- Extreme anger, sadness or anxiety
- Aggressive or attention-seeking behaviour
- Frequent or unexplained injuries
- Low self-esteem or withdrawn presentation
- Self-harm or risk-taking behaviour
- Age-inappropriate sexualised behaviour
- Evidence of exploitation (criminal, sexual or financial)
- Substance misuse
- Poor mental health
- Persistent absence or poor attendance

### Physical Abuse

#### Potential indicators include:

- Injuries with inconsistent or absent explanations

- Delay in seeking treatment
- Caregiver shows little concern or is evasive
- Frequent visits to different A&E departments
- Multiple injuries, including:
  - Bruising in non-mobile babies
  - Patterned bruises (e.g. handprints, belt marks)
  - Grasp marks, bite marks, or burns
  - Scalds with clear immersion lines
  - Fractures, especially in babies or with unexplained cause
  - Numerous or unexplained scars

### **Mongolian Blue Spots**

Flat, grey-blue marks seen in some ethnic groups, often on the lower back. These are:

- Present from birth or shortly after
- Not swollen, inflamed or painful
- Non-changing in colour/shape over time
- Should still be recorded and monitored for safeguarding clarity

### **Emotional Abuse**

Often harder to identify, as the signs are usually behavioural:

- Developmental delays
- Low self-esteem, anxiety or depression
- Inappropriate attachment behaviour (e.g. indiscriminate affection)
- Aggression or withdrawal
- “Frozen watchfulness”
- Constant scapegoating or humiliation

### **Sexual Abuse**

May involve physical acts or non-contact abuse (e.g. grooming, exposure to pornographic material). Signs can include:

#### **Behavioural indicators:**

- Sexual knowledge or behaviour inappropriate for age
- Fear of specific people or places
- Secretive behaviour or sudden fearfulness
- Reluctance to change clothes for PE
- Self-harm, eating disorders or suicidal thoughts

#### **Physical indicators:**

- Pain, bleeding or bruising in genital or anal areas
- STIs or pregnancy (particularly in younger girls)
- Stained or torn underwear
- Recurrent urinary infections

## Neglect

Neglect may be persistent or chronic. Indicators include:

- Poor hygiene, constant hunger or tiredness
- Inappropriate or inadequate clothing
- Untreated medical conditions
- Poor growth or development
- Frequent lateness or non-attendance at school
- Left alone or with unsafe adults for long periods
- Thrives better away from the home environment

## Affluent Neglect

This form of neglect may affect children in wealthier families and can include:

- Emotional neglect through parental absence or emotional unavailability
- Over-reliance on paid carers, with little parental bonding
- High academic pressure or emotional distance
- Exposure to domestic abuse, substance misuse or parental mental health issues (often assumed to occur only in lower-income families)

## Risks include:

- Unsupervised independence leading to exploitation or risky behaviour
- Hidden mental health difficulties due to stigma or assumptions
- Difficulty accessing support due to bias (“it wouldn’t happen here”)
- Missed indicators by professionals due to unconscious bias

Children in boarding settings may be especially vulnerable if parental oversight is limited or inconsistent.

## Risk Indicators – Red Flags

Abuse is often associated with patterns. Risk factors include:

- Fear of going home or being around certain adults
- Aggressive or unusual behaviour
- Delayed speech or language development
- Reluctance to change for PE or take part in activities
- Parents who avoid professionals or appointments
- Evidence of substance misuse, domestic abuse or mental illness in the home
- Known offenders living in or regularly visiting the home

These factors are **not proof**, but should prompt further consideration, consultation with the DSL and possibly a referral.

## 2. Anti-Bullying and Cyberbullying

St John's School is committed to providing a safe and respectful environment for all pupils, where bullying in any form is not tolerated. We understand that bullying behaviour may, in some instances, meet the threshold for child-on-child abuse and must be treated as a safeguarding concern.

Our separate Anti-Bullying Policy outlines how we prevent and respond to all forms of bullying, including:

- physical, verbal and emotional bullying
- cyberbullying (via social media, messaging, gaming or image sharing)
- racist, sexist, homophobic or biphobic bullying
- bullying targeting SEND, disability, appearance or other perceived differences
- sexual harassment and harmful sexual behaviour

The school recognises that **children with SEND and those who are perceived as different** are particularly vulnerable to bullying and child-on-child abuse. Staff are trained to identify patterns of behaviour and intervene early.

We record all reported bullying incidents and concerns on CPOMS. These are monitored regularly by the safeguarding team to identify trends, ensure appropriate support is provided and evaluate the impact of the school's response.

Where bullying is persistent, severe or part of a wider pattern of behaviour (including sexualised bullying or coercion), it will be treated as **child-on-child abuse** and responded to in line with our Safeguarding and Child Protection Policy and KCSIE 2025. The DSL and Head of School will consider whether further investigation, Early Help, external referral or other safeguarding action is required.

Bullying and child-on-child abuse are addressed through the PSHCE and RSE curriculum, assemblies, and themed workshops. Pupils are taught to recognise unhealthy relationships, seek help and speak out when they or others are mistreated. The school promotes a culture where kindness, mutual respect and standing up for others are actively encouraged.

## 3. Racist Incidents

St John's School is committed to promoting respect, understanding and inclusion across all areas of school life. We have a zero-tolerance approach to racism, discrimination or harassment on the grounds of race, ethnicity, nationality or culture.

All racist incidents will be taken seriously and dealt with in line with our Behaviour Policy, Anti-Bullying Policy and Safeguarding procedures. This includes any verbal, written, online or physical abuse that targets a pupil or member of the school community because of their actual or perceived race, heritage, religion or culture.

Racist incidents may include:

- Derogatory language, slurs or name-calling
- Mocking of accents, appearance or customs
- Racist jokes, images or graffiti

- Exclusion or marginalisation based on ethnicity
- Online abuse or racist content shared via social media
- Incidents that may appear minor in isolation but form part of a wider pattern

### **Responding to Racist Incidents**

- All staff have a duty to challenge racist language or behaviour when it occurs
- Any concerns or disclosures must be recorded on CPOMS and reported to the DSL
- Victims will be listened to and supported, and perpetrators will be dealt with proportionately
- The Head of School and DSL will decide whether the incident meets the threshold for a safeguarding concern or requires involvement from external agencies
- Parents of all pupils involved will be informed where appropriate
- Repeated or serious racist incidents may trigger child-on-child abuse procedures

As a school, we record and monitor all racist incidents. This data is regularly reviewed by the safeguarding team and shared with governors to help us identify patterns and respond appropriately.

We recognise that racist abuse may overlap with bullying, child-on-child abuse or online harm and may also impact a child's mental health and wellbeing. Our approach prioritises education, accountability and creating a safe, inclusive environment for all.

Discriminatory abuse can also be based on religion, disability, gender identity or sexual orientation. The school takes all forms of prejudice-based bullying seriously and ensures these incidents are recorded, monitored and addressed through our safeguarding, behaviour and anti-bullying procedures.

## **4. Radicalisation and Extremism**

St John's School recognises its duty under the *Prevent Duty 2023* to have due regard to preventing children and young people from being drawn into terrorism or extremist activity.

We are committed to safeguarding pupils from radicalisation and extremism in all forms. This includes protecting pupils from ideologies associated with Islamist extremism, the far right, white supremacy, incel subcultures, animal rights extremism, and any ideology that promotes violence, hatred or the rejection of British values.

### **Definition of Extremism**

As defined in the Prevent Strategy, extremism is:

“Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.”

It also includes any calls for the death of members of the UK armed forces.

## Our School Approach

- Preventing radicalisation is treated as a **safeguarding concern**, not separate from our broader safeguarding duties.
- The DSL is the single point of contact for Prevent concerns.
- Staff are trained to recognise vulnerabilities to radicalisation and know how to refer concerns through safeguarding procedures.
- The PSHCE, RSE and wider curriculum provide opportunities for pupils to learn about British values, diversity, respect and critical thinking.
- We maintain robust filtering and monitoring systems to ensure safe online access and identify patterns of risky behaviour online.

## Reporting a Concern

If a member of staff has a concern about a pupil being radicalised or exposed to extremist material or groups, they must:

- **Report it to the DSL without delay**
- **Call 999** if the pupil is at immediate risk
- **Call 101** for police advice in non-urgent cases
- Use the Department for Education's Prevent Helpline for further advice: **020 7340 7264**

## Vulnerability to Radicalisation

There is no single pathway to radicalisation, but pupils may be more vulnerable due to a combination of:

- **Identity issues:** Struggling with identity, belonging or values
- **Personal circumstances:** Family tension, trauma, discrimination or community conflict
- **Emotional vulnerability:** Isolation, low self-esteem, a sense of injustice or rejection
- **Online influences:** Exposure to extremist material or forums
- **Criminality:** Contact with criminal networks, or poor reintegration following custody
- **Special Educational Needs:** Difficulty understanding social cues, motivations or consequences

## More serious risk indicators include:

- Attempts to join or contact extremist groups or recruiters
- Possession of extremist material or access to violent propaganda
- Justifying violence or using extremist language in conversation or online
- Withdrawal, secrecy or sudden changes in appearance or behaviour
- Expressing a desire to cause harm in the name of a cause or ideology

Staff should remember that these indicators do not confirm radicalisation, but may signal a safeguarding need requiring further exploration by the DSL.

## Channel Programme

Where a concern is raised, the DSL may make a **Prevent referral**. This may result in the child being referred to **Channel**, a multi-agency programme offering early intervention and support to individuals vulnerable to being drawn into terrorism.



Channel participation is voluntary and confidential, and tailored to each individual's needs.

### Further Resources

- Prevent Duty Guidance (2023)
- [Channel Guidance](#)
- DfE Prevent Helpline: **020 7340 7264**

## 5. Domestic Abuse (inc Operation Encompass)

Domestic abuse accounts for around one quarter of all violent crime. It includes actual or threatened physical, emotional, psychological, sexual or financial abuse, and is often characterised by a pattern of coercive, controlling or manipulative behaviour. Domestic abuse affects people regardless of race, gender, age, sexuality, disability, class or religion and can involve other forms of abuse.

We use the term **domestic abuse** rather than *domestic violence* to recognise that not all abuse is physical and to reflect the wide range of behaviours that may be involved.

### How does it affect children?

Children can be victims of domestic abuse in their own right. They may see, hear or experience the impact of abuse at home, or they may suffer abuse in their own intimate relationships (also known as teenage relationship abuse). The emotional and psychological consequences of domestic abuse can be significant and long-lasting. It can affect their health, wellbeing, behaviour, development and education.

Some children may internalise blame for the abuse. Others may be forced to leave their homes, experience disrupted routines or become involved in harmful relationships themselves.

Children who witness or live with domestic abuse are at risk of significant harm.

### Signs to look out for

Children impacted by domestic abuse may show a range of behavioural or emotional changes, such as:

- Becoming withdrawn, anxious or unusually aggressive
- Displaying fatigue, lack of concentration or difficulty sleeping
- Bed-wetting or regression in behaviour
- Showing reluctance to go home or being unusually clingy
- Seeking excessive reassurance or becoming over-compliant
- Excelling in school as a coping mechanism or escape

These signs are not exclusive to domestic abuse, but should always prompt staff to consider whether it could be a contributing factor.

## What staff should do

If a member of staff suspects that a child or family is affected by domestic abuse, they **must inform the DSL without delay**. Staff should not approach the family directly unless advised to do so by the DSL.

The DSL will assess the information and determine whether a safeguarding referral or other support is needed, in line with local guidance.

## Support services

- **Splitz Support Service**  
For women, children and young people affected by domestic abuse  
Tel: 0345 155 1074 | Email: [admin@splitzdevon.org](mailto:admin@splitzdevon.org)
- **SAFE (Stop Abuse For Everyone)**  
Based in Exeter, providing support to families and children  
Tel: 030 30 30 0112 | Email: [hello@safe-services.org.uk](mailto:hello@safe-services.org.uk) (Mon–Fri, 9am–5pm)
- **National Domestic Abuse Helpline (Refuge)**  
Available 24 hours a day  
Tel: 0808 2000 247 | Website: [www.refuge.org.uk](http://www.refuge.org.uk)

## Operation Encompass

St John's School participates in **Operation Encompass**, a national initiative that helps police and schools work together to support children who have witnessed or experienced domestic abuse.

When police attend a domestic incident where children are present, they inform the school's *Key Adult* (usually the DSL) before the start of the next school day. This allows the school to offer appropriate support to the child, from a check-in or pastoral care to more tailored interventions.

All information shared through Operation Encompass is handled in strict confidence and only shared with those who need to know in order to support the child.

## 6. Exploitation (inc Child Sex Exploitation, Child Criminal Exploitation and County Lines)

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of child abuse. Both occur when an individual or group takes advantage of an imbalance of power to manipulate, coerce or deceive a child into sexual or criminal activity. This imbalance may be due to age, gender, cognitive ability, physical strength, status, or access to resources.

Exploitation often involves an exchange—real or perceived—for something the child wants or needs, and/or benefits the perpetrator (e.g. financially or through increased status). Victims may not recognise their abuse and may believe they are in control or in a genuine relationship.

Abuse may be:

- Perpetrated by adults or peers
- One-off or repeated
- Online or offline
- Forceful, threatening or based on grooming and enticement

### **Child Criminal Exploitation (CCE)**

CCE can include:

- Drug trafficking (including county lines)
- Forced theft or pickpocketing
- Working in cannabis farms or forced begging
- Being coerced to commit violence or carry weapons

**County Lines** refers to drug networks using children or vulnerable people to move drugs and money between areas, often using ‘burner’ phones and exploiting children through the same methods seen in CSE.

Children exploited through county lines may:

- Go missing or be found far from home
- Travel with unknown adults
- Be recruited at school, in parks or online
- Be given expensive items or substances
- Be fearful of authorities, gangs or returning home

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. It may involve physical contact (including penetration, sexual touching or oral sex), or non-contact abuse (such as sharing sexual images or grooming online). The abuse can happen in person or via technology and might involve multiple perpetrators or victims.

CSE can affect any child or young person, including those aged 16 and 17 who may legally consent to sex but are still vulnerable to exploitation.

### **Recognising Indicators of CSE/CCE**

Common signs that a child may be at risk of or experiencing exploitation include:

- Going missing from home or school
- Frequent absence or truanting
- Changes in mood, behaviour or appearance
- Unexplained gifts or expensive items
- Concerns around multiple phones or social media use
- Associating with older individuals or gangs
- Evidence of grooming or online exploitation
- Sexually inappropriate behaviour or language
- Injuries or signs of physical/sexual assault
- Substance misuse, mental health issues or self-harm
- Involvement in crime or police contact

- Disengagement from education

These signs may be seen individually or as part of a wider pattern of concern.

### **Our Response and Safeguarding Actions**

All concerns about CSE or CCE must be reported to the **Designated Safeguarding Lead (DSL)** without delay.

We recognise that many children who are being exploited do not see themselves as victims and may resist support. Nonetheless, we have a duty to act on any concerns.

The DSL will:

- Use the **Devon Exploitation Toolkit** and/or **Adolescent Safety Framework (Safer Me) Assessment** to assess the level of risk
- Refer to the **Devon MACE (Missing and Child Exploitation) Panel** if indicated (the Devon MACE Panel (Missing and Child Exploitation) is a multi-agency forum used to assess, plan and review the support and protection of high-risk children).
- Make a safeguarding referral to the **Local Authority Safeguarding Hub**
- Contact the police immediately if a child is in danger (999)

Where there are concerns about regular absence from school, the possibility of exploitation will always be considered and explored sensitively with the child and parents.

### **Education and Prevention**

The risks of criminal and sexual exploitation are covered in our **PSHCE and RSE curriculum**, including:

- The grooming process and how to recognise it
- Staying safe online
- How and where to seek help
- Challenging stereotypes and recognising unhealthy relationships

We aim to ensure pupils understand the risks and know how to keep themselves and their peers safe.

### **Further Guidance**

- Child sexual exploitation: guide for practitioners
- County lines guidance: criminal exploitation of children

## **7. Female Genital Mutilation (FGM)**

FGM is a serious form of child abuse and violence against women and girls. It is illegal in the UK and considered a violation of human rights. All school staff have a duty to be aware of the signs of FGM and the mandatory reporting requirements.

## What is FGM?

FGM refers to procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs, for non-medical reasons. It has no health benefits and can lead to serious physical and emotional harm.

### Types of FGM:

- **Type 1 (Clitoridectomy):** Partial or total removal of the clitoris
- **Type 2 (Excision):** Partial or total removal of the clitoris and labia minora
- **Type 3 (Infibulation):** Narrowing of the vaginal opening
- **Type 4:** Other harmful procedures such as pricking, piercing, scraping or cauterising

### Why is it carried out?

FGM is often rooted in cultural, social or religious beliefs. Reasons given may include:

- Social acceptance or preparation for marriage
- Perceived cleanliness or femininity
- Family honour or community belonging
- Misunderstood religious obligation
- Belief it aids childbirth or preserves virginity

None of these reasons justify the practice, and it is illegal under the Female Genital Mutilation Act 2003.

### The Law and Mandatory Reporting

Under Section 5B of the **FGM Act 2003**, there is a **mandatory reporting duty** for:

- **Teachers**
- **Health professionals**
- **Social care workers**

This means that if, during the course of their work, a teacher discovers that a girl under 18 has had FGM (either through disclosure or physical signs), **they must report it to the police by calling 101**, no later than the end of the next working day.

This duty **applies to the individual staff member** and must not be passed to the DSL, though the DSL should be informed.

**In an emergency or where a child is at risk of immediate serious harm**, staff should call **999**.

### Important:

There are no circumstances in which a member of staff should examine a girl for signs of FGM.

### Recognising Signs and Risk Factors

Staff should remain alert to indicators that a girl may be at risk of FGM or may have already undergone the procedure. FGM may be more prevalent during holiday periods when families travel abroad.

#### **Indicators FGM may be planned:**

- Talking about a special ceremony or holiday abroad
- Plans for a long trip to a country known for practicing FGM
- Siblings or other family members having had FGM
- Statements like “I’m going to be cut” or “prepare for marriage”

#### **Signs a girl may have undergone FGM:**

- Prolonged absence from school
- Difficulty walking, sitting or standing
- Reluctance to take part in physical activities
- Complaints of pain or discomfort, particularly between the legs
- Repeated urinary tract infections or menstrual issues
- Behavioural changes – appearing withdrawn, anxious or upset
- Disclosure of something being done that they’re “not allowed to talk about”
- Sudden drop in academic performance or increased isolation

Staff should also be mindful of girls from communities where FGM is more commonly practiced. These may include (but are not limited to): Somalia, Sudan, Sierra Leone, Kenya, Nigeria, Egypt, Eritrea, Yemen, Afghanistan, Kurdistan, Indonesia and parts of Pakistan.

#### **School Response**

- All concerns about potential or known FGM must be reported to the **DSL immediately**
- **Known cases** (where FGM has been disclosed or physically identified) must be reported directly to the **police (101)** by the individual teacher involved
- If a child is at immediate risk, call **999**
- Concerns outside of the mandatory reporting duty will be handled in line with the school’s **child protection procedures**

FGM is included in the school’s safeguarding training so that staff are confident in identifying and responding to concerns.

## **8. Forced Marriage**

Forced marriage is a safeguarding issue and a serious abuse of human rights. It involves one or both individuals being coerced into marriage against their will. Coercion may include emotional, psychological, financial, sexual or physical pressure. It is important to note that **forced marriage can also involve threats, violence or abuse** and is recognised in the UK as a **form of domestic abuse and child abuse**.

Under the **Anti-Social Behaviour, Crime and Policing Act 2014**, forcing someone to marry is a **criminal offence in England and Wales**, including:

- Taking someone overseas to force them to marry (whether or not the marriage actually takes place)
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they are pressured or not)

### Arranged Marriage vs Forced Marriage

It is important to distinguish between a **forced marriage** and an **arranged marriage**:

- In **arranged marriages**, families may be involved in selecting a partner, but the final choice remains with the individual.
- In **forced marriages**, there is **no free and full consent**, and pressure or abuse is used to force the marriage.

### School Response

- If a member of staff becomes aware of a **potential or actual forced marriage**, this should be treated as a **safeguarding concern**.
- Concerns **must be reported immediately to the DSL**, who will consult with the **Local Authority Safeguarding Hub**.
- **Under no circumstances should school staff attempt to intervene or mediate directly with the family or community.**

Where there is **immediate danger**, the police should be contacted on **999**.

Further advice is available via the **Forced Marriage Unit (FMU)**:

**Telephone:** 020 7008 0151

**Email:** [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk)

(Open Monday to Friday, 9am to 5pm – out-of-hours support is available through the Foreign, Commonwealth and Development Office response centre)

## 9. Honour-based Abuse

Honour-Based Abuse (HBA) is a form of abuse committed to protect or defend the perceived honour of an individual, family or community. It can include physical, emotional, psychological, financial or sexual abuse.

HBA is often used to assert control over individuals who are seen to have brought 'shame' or 'dishonour' upon the family or cultural group. This can involve situations where someone is:

- involved in a relationship not approved by their family
- seeking to leave an arranged or forced marriage
- rejecting cultural or religious expectations, including clothing or lifestyle choices
- resisting control over personal choices or freedoms

HBA is a **violation of human rights** and is **not justifiable under any cultural or religious grounds**. It is often linked to other safeguarding concerns, such as **domestic abuse, forced marriage, or female genital mutilation (FGM)**.

## School Response

- Staff should be alert to signs that a pupil may be at risk of HBA, including sudden changes in behaviour, restrictions on freedom, or concerns raised by the pupil.
- Any suspicion or disclosure of HBA must be reported **immediately to the DSL**, who will follow the appropriate safeguarding procedures.
- If there is **immediate risk of harm**, staff should contact **the police on 999**.

## 10. One Chance Rule

All staff must be aware of the **‘One Chance Rule’** when dealing with potential cases of **Forced Marriage, Female Genital Mutilation (FGM)** and **Honour-Based Abuse (HBA)**.

This means that staff may only have **one opportunity** to speak to a pupil who is at risk and **one chance to act** to safeguard them. If the opportunity to offer help is missed, it may be lost forever, and the child could be placed in significant danger.

Staff should:

- Treat any disclosure seriously
- **Report concerns immediately** to the Designated Safeguarding Lead (DSL)
- **Not approach families or community members**
- Be mindful of the need for discretion, sensitivity and swift action

We are committed to ensuring that any pupil at risk is listened to, supported and protected. Delays or inaction could have life-changing consequences.

## 11. Mental Health

Staff are aware that mental health issues can, in some cases, be a sign that a child has experienced or is at risk of abuse, neglect or exploitation. While only trained professionals can make clinical diagnoses, all staff are in a position to observe and identify signs that a pupil may be struggling with their mental health or wellbeing. As outlined in Part 1 of KCSIE 2025, all staff are expected to recognise when mental health concerns may indicate a wider safeguarding risk.

Early intervention is vital. The school’s approach to mental health is based on a graduated response and includes four key areas:

### 1. Prevention

- Creating a calm, safe and supportive environment where pupils feel valued
- Equipping pupils with the skills to manage life’s challenges through the curriculum (including PSHCE and RSE) and whole-school initiatives
- Promoting a culture of resilience and emotional literacy

### 2. Identification



- Staff are trained to recognise early signs of mental health difficulties
- Concerns may include noticeable changes in behaviour, mood, attendance, academic performance or social interactions

### 3. Early Support

- Where concerns are identified, staff report to the Designated Safeguarding Lead (DSL) or a Deputy DSL
- The DSL coordinates support using a graduated response:
  - **Assess:** Identify and understand the child's needs
  - **Plan:** Agree the interventions and support strategies
  - **Do:** Put the plan into action with appropriate staff and services
  - **Review:** Monitor and evaluate the effectiveness of the support

### 4. Access to Specialist Support

- The DSL may liaise with external mental health professionals, including CAMHS and Early Help, to ensure timely and appropriate intervention
- School signposts parents and pupils to relevant services and supports referrals when needed

### Adverse Childhood Experiences (ACEs)

We recognise that adverse life events can have a lasting impact on children's emotional wellbeing and development. These include:

- **Loss or separation** (e.g. bereavement, parental separation, care arrangements)
- **Family breakdown**, domestic abuse or conflict
- **Trauma** (e.g. abuse, neglect, serious accidents or community violence)
- **Life changes** (e.g. moving house, changing schools, new siblings)
- **Experiences of bullying**, discrimination or social isolation
- **Chronic stress**, including from poverty or parental ill health

ACEs can contribute to poor mental health, affect learning and behaviour and may increase safeguarding risks.

### Common Mental Health Difficulties in Children and Young People

Staff are made aware through training of a range of conditions, including:

- **Emotional disorders:** anxiety, phobias, depression
- **Conduct disorders:** defiance, aggression, antisocial behaviour
- **Hyperkinetic disorders:** ADHD, attention and activity difficulties
- **Developmental disorders:** e.g. autism, speech and social delays
- **Attachment disorders:** insecure or disordered relationships with caregivers
- **Trauma-related conditions:** such as PTSD
- **Eating disorders**, self-harm, compulsions and psychosis

### Supporting Mental Health in School

All staff must report concerns about a pupil's mental health to the DSL or deputy DSL without delay, following the procedures set out in this policy. If a pupil expresses suicidal thoughts or is suspected of self-harming, this must be treated as a safeguarding concern and reported immediately to the DSL. The school may implement a safety plan in conjunction with external services and the family, as appropriate. In high-risk cases, immediate support from emergency services may be required.

Staff will receive training as part of their ongoing safeguarding updates, including how childhood trauma and abuse can affect a child's mental health through adolescence and into adulthood.

The school draws on guidance and training from the following sources to support best practice:

- **Mental Health and Behaviour in Schools** (DfE)
- **Senior Mental Health Lead Training**
- **Rise Above** (Public Health England)
- **Wellbeing for Education Recovery**
- **Every Interaction Matters** (DfE training)
- **Preventing and Tackling Bullying** (DfE)

## 12. Private Fostering Arrangements

A **private fostering arrangement** occurs when a child under the age of 16 (or under 18 if they have a disability) is cared for, for **28 days or more**, by someone who is **not** a parent, step-parent, legal guardian or a close relative (defined as grandparent, sibling, aunt, uncle or step-sibling by blood or marriage). This arrangement is made **without the involvement of the local authority**.

Children living in residential schools, hospitals or in care placements arranged by the local authority **are not** privately fostered.

Private fostering can occur for various reasons, such as:

- Children sent to the UK for education or health care by birth parents living overseas
- Teenagers living with friends' families following parental separation, divorce or family breakdown
- Children living with host families for sports or music academies
- Parents working away or abroad

Private fostering happens across all cultures and communities, including within British families.

### Safeguarding Responsibilities

While many private fostering arrangements are entirely safe and supportive, schools recognise that these children can be **vulnerable** to abuse, exploitation, neglect or trafficking.

**All staff should be alert** to the possibility of a child being in a private fostering arrangement, particularly if they:

- Mention living with someone other than their parent or close relative

- Seem unclear about who has parental responsibility
- Refer to 'family friends' or 'aunties/uncles' who are not biologically related

### **Legal Requirements**

By law, the **parent or carer** must notify children's services of a private fostering arrangement at least six weeks in advance, or immediately if the arrangement has already begun.

If any member of staff becomes aware that a child may be in a private fostering arrangement, they **must inform the DSL** without delay.

The **DSL will notify the Local Authority Safeguarding Hub** (e.g. MASH) to ensure statutory checks and support are in place for the child and their carers.

## **13. Looked after children and previously looked after children.**

Children who are looked after (LAC) or previously looked after (PLAC) are some of the most vulnerable in our school community. The most common reason for children becoming looked after is **experiencing abuse or neglect**. These children may face additional safeguarding challenges and barriers to learning.

### **Safeguarding and Staff Awareness**

We ensure that all staff understand the importance of promoting the educational achievement and emotional wellbeing of LAC and PLAC. Staff receive appropriate training and are alert to safeguarding concerns such as:

- Attachment difficulties
- Risk of exploitation
- Placement breakdown
- The emotional impact of trauma and separation

Where relevant, **key staff will have information** about the child's:

- Legal status (e.g. whether they are looked after under a care order or voluntary agreement)
- Care arrangements, including any delegated authority
- Contact arrangements with birth parents or others with parental responsibility

### **Designated Teacher**

The school's **Designated Safeguarding Lead (DSL)** is also the **Designated Teacher for Looked After Children** and promotes positive outcomes for these pupils. The DSL is part of the senior leadership team and both the DSL and the nominated governor for safeguarding receive updated, role-specific safeguarding training at least annually in accordance with KCSIE 2025.

They will:

- Maintain up-to-date records and attend/review PEP (Personal Education Plan) meetings
- Liaise with the child's **social worker**
- Have regular contact with the **Virtual School Head** in the Local Authority to ensure appropriate support and funding (e.g. Pupil Premium Plus) is in place
- Provide a key point of contact for the child and their carers

The Designated Teacher will follow the statutory guidance:

***Promoting the education of looked-after children and previously looked-after children*** (DfE) and ensuring this is embedded in school practice.

## 14. Children Missing Education

Regular school attendance is vital for children's welfare and educational outcomes. Absence from education, particularly where it is **unexplained or repeated**, can be a warning sign of a range of safeguarding concerns, including neglect, abuse, child sexual or criminal exploitation, radicalisation, FGM or forced marriage.

Our school:

- **Monitors attendance closely**, including patterns of persistent absence or unexplained absences
- Holds **more than one emergency contact number** for every pupil where possible, to ensure we can reach someone if a concern arises
- Works proactively with families to understand reasons for absence and offer support

The **DSL and Head of School** review attendance concerns regularly. Where a pupil:

- Goes missing from education without explanation
- Has **frequent or prolonged absences**
- **Disappears during the school day** without good reason
- Or is believed to be at risk of harm

The school will take swift action and, where appropriate, make a referral to the **Local Authority** in line with *Children Missing Education: Statutory Guidance for Local Authorities*.

We are particularly alert to pupils at risk of:

- Travelling to conflict zones
- Female Genital Mutilation (FGM)
- Forced marriage
- Exploitation (CSE/CCE)

All staff are expected to report concerns about children missing education to the DSL immediately.

## 15. Child on Child Abuse (inc Sexual Violence, Sexual Harrassment and Harmful Sexual Behaviour)

St John's School recognises that children can abuse other children and that such behaviour should never be dismissed as 'banter', 'just having a laugh' or 'part of growing up'. We take all forms of child-on-child abuse seriously and follow **Part 5 of Keeping Children Safe in Education (KCSIE 2025)** when responding to concerns.

### Forms of Child-on-Child Abuse

Child-on-child abuse can take many forms, including (but not limited to):

- **Domestic abuse** – actual or threatened acts of physical, sexual, emotional or financial abuse in adolescent relationships
- **Bullying** – including cyberbullying, prejudice-based or discriminatory bullying
- **Child Sexual Exploitation (CSE)** – including child-on-child sexual exploitation
- **Harmful Sexual Behaviour (HSB)** – developmentally inappropriate or abusive sexual behaviour that is harmful to the child or others
- **Upskirting** – taking images under clothing without consent; this is a criminal offence
- **Serious youth violence** – including assaults, weapon-enabled crimes and sexual violence
- **Initiation/hazing rituals** – abuse or humiliation linked to initiation into a group, in person or online
- **Sharing of nudes/semi-nudes** – also known as 'sexting' or youth-produced sexual imagery, whether consensual or not

### Our Approach

Our response to child-on-child abuse is holistic, recognising that children may experience multiple overlapping forms of harm. We are mindful of gender dynamics and power imbalances. For example, girls may be more likely to experience unwanted sexual touching, while boys may be vulnerable to coercive hazing.

We aim to reduce the risk of child-on-child abuse by:

- Promoting an ethos of **respect, kindness and inclusion**
- Setting and enforcing **clear behaviour expectations**
- Delivering a **comprehensive PSHE and RSE curriculum** covering healthy relationships, consent, online safety and abuse
- Providing **safe ways for pupils to report concerns** to trusted adults
- Identifying concerns early and offering **targeted support** for pupils at risk
- Educating pupils to **support peers and seek help** for themselves or others

### Responding to Concerns

All concerns or disclosures must be reported **immediately to the DSL** using the school's safeguarding procedures.

- If there is a **risk of harm** or a **potential crime**, the DSL will contact the **Police and/or Local Authority Safeguarding Hub** without delay
- Victims will be **listened to, supported and kept safe**, with all actions taken in line with statutory guidance
- Alleged perpetrators will also be supported and helped to change their behaviour
- **Risk assessments** will be implemented to safeguard all parties

## Children Who Are LGBTQIA+ or Gender Questioning

Being lesbian, gay, bisexual or gender questioning is not in itself a safeguarding concern, but we recognise that these pupils may face **additional risks** of bullying, discrimination or abuse. Our approach is guided by DfE's 2024 advisory note on supporting gender-questioning children in independent schools.

For gender-questioning pupils, we take a **cautious, considered approach**. This includes working in partnership with the child's parents (unless doing so would pose a significant risk), seeking **clinical guidance** where appropriate, and ensuring pupils receive **individualised support** for any underlying vulnerabilities such as mental health needs or neurodivergence.

We understand that LGBTQIA+ children may be less likely to share concerns if they don't feel safe or supported. Therefore, we actively work to reduce barriers and create a culture where **all children feel able to speak up**.

## Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour

Sexual behaviour in children and young people exists on a continuum from **normal and exploratory** through to **problematic and abusive**. Staff must be able to distinguish between:

- **Developmental sexual activity** – mutual, exploratory and age-appropriate
- **Inappropriate sexual behaviour** – socially or developmentally inappropriate, or distressing to others
- **Abusive sexual activity** – involving coercion, threat, secrecy or a power imbalance

Staff should remain alert to:

- Sexual harassment and sexual violence
- Sexting/youth-produced sexual imagery
- Bullying and cyberbullying
- Physical abuse (hitting, kicking, hair-pulling, etc)
- Initiation/hazing-type violence
- Upskirting

## Key Considerations

When evaluating sexual behaviour, the following factors are used to help determine the nature and seriousness of an incident:

- **Equality** – differences in age, development, emotional maturity, authority or influence
- **Consent** – genuine agreement based on understanding, choice and capacity
- **Coercion** – manipulation, threats, pressure or force used to obtain compliance

Sexual behaviour may be a result of trauma, exposure to sexual content or abuse. Not all behaviours require statutory intervention, but they **must always be addressed**. Educational support, pastoral input and safeguarding action may all be appropriate.

More detailed guidance is available in the *Devon multi-agency protocol: Working with Sexually Active Young People*

[[https://www.proceduresonline.com/swcpp/devon/p\\_underage\\_sexual\\_act.html](https://www.proceduresonline.com/swcpp/devon/p_underage_sexual_act.html)] or through the *South West Child Protection Procedures*.

## 16. Online Safety

Our pupils increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, Twitter (X), Instagram, Snapchat and ooVoo.

The school adopts a whole school approach to online safety which seeks to reduce risk as far as possible without depriving pupils of the significant benefits provided by technology and the internet.

Unfortunately, some adults and other children use these technologies to harm children.

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

- **content:** being exposed to illegal, inappropriate or harmful material
- **contact:** being subjected to harmful online interaction with other users
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams

The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings.

Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

The School has an online safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents (See flowchart, Appendix 7).

School will also provide advice to parents when pupils are being asked to learn online at home and consider how best to safeguard both pupils and staff.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The school's approach to filtering and monitoring is guided by the **DfE's 'Filtering and Monitoring Standards in Schools and Colleges' (2023)** and is regularly reviewed to ensure it remains effective

## 17. Youth Produced Sexual Imagery (Sexting)

The sharing of sexual imagery and videos between young people via mobile phones, messaging apps or social media has become increasingly common. However, any imagery involving individuals under the age of 18 is illegal and must be treated as a safeguarding matter.

### Definition

Youth produced sexual imagery includes situations where:

- A person under the age of 18 **creates and shares** sexual imagery of themselves with a peer.
- A person under the age of 18 **shares** sexual imagery created by another under-18 with peers or adults.
- A person under the age of 18 **possesses** sexual imagery created by another under-18.

## Legal Framework

Creating, possessing, or sharing sexual imagery of a person under 18 is a criminal offence, even if it is consensual and between young people of the same age.

Staff must not view, copy, print, or share any such imagery. Doing so could be a criminal offence.

## Responding to Incidents

All incidents must be treated as safeguarding concerns and referred to the Designated Safeguarding Lead (DSL) **without delay**, following the guidance set out in:

- *“Sharing nudes and semi-nudes: advice for education settings working with children and young people” (UKCIS, 2020)*
- *KCSIE (2025), Part 5*

## Steps to be followed:

1. **Do not view the imagery.** Confiscate the device if appropriate and isolate it (e.g. set to flight mode or turn it off).
2. **Refer immediately** to the DSL. Do not investigate, delete or forward the imagery.
3. **The DSL will conduct an initial review**, consider the context, and determine the appropriate next steps using the UKCIS decision-making flowchart.
4. **Parents/carers will usually be informed**, unless doing so puts the child at greater risk of harm.
5. **If necessary, the DSL will contact the Local Authority Safeguarding Hub and/or Police.**  
Immediate referral is required if:
  - The imagery involves an adult.
  - The child has been coerced, groomed or exploited.
  - The content is violent, abusive or of a nature unusual for the child’s developmental stage.
  - The child involved is under 13.
  - There is reason to believe the child is at immediate risk of harm (e.g. self-harm or suicidal ideation).

## When a Referral May Not Be Required

If the DSL determines that the incident does not meet the threshold for police or children’s services involvement, the school may manage the situation internally. This will include:

- Speaking to the young people involved.
- Providing appropriate education and support.
- Recording the decision-making process and rationale on the school’s safeguarding system (e.g. CPOMS).

In making this decision, the DSL will consider:



- The age and maturity of those involved.
- The presence of any coercion or power imbalance.
- Whether this is a one-off incident or part of a wider pattern.
- The vulnerability of the children involved.
- The intent behind the image sharing.
- The impact on the children involved.

## **18. Additional Considerations for Residential and Boarding Pupils (NMS)**

How we safeguard pupils living away from home

At St John's, safeguarding our boarding pupils is central to our care. We recognise the specific risks that can arise when children live away from home and have clear, consistent systems in place to protect them at all times, day and night.

### **Responding to Pupils Missing from Boarding**

We monitor pupil movements closely through robust sign-in/out procedures. Staff are trained to identify early signs that a pupil may be planning to leave the premises or has gone missing, and we respond swiftly using our Missing Child Policy and local safeguarding procedures. Every incident is recorded and followed up.

### **Addressing Affluent Neglect**

We check in regularly with boarders who have limited contact with parents or carers. Where pupils appear isolated or emotionally unsupported, pastoral staff offer targeted support, and concerns are logged and reviewed by the safeguarding team. We build trusted relationships so pupils feel seen and heard, even when parental presence is minimal.

### **Providing Safe Overnight Supervision**

Overnight boarding staff are fully trained in safeguarding and know how to respond to any concerns that arise after hours. They maintain a visible, supportive presence in the evenings and overnight, and can contact the DSL or deputy DSL at any time via our on-call rota. Any safeguarding concern raised at night is acted upon and reviewed the next morning.

### **Respecting Privacy While Staying Vigilant**

We balance pupils' right to privacy with our safeguarding responsibilities. Staff supervise sensitively in dormitories, bathrooms and changing areas, staying alert to physical or emotional signs of harm while following safer working practice. We never ignore our instincts and always report and record concerns.

### **Ensuring Pupils Know How to Report**

Boarders are regularly reminded—through posters, pupil handbooks and house meetings—how to report worries or disclosures, including anonymously or out-of-hours. They can speak to house staff, the school counsellor, or any trusted adult. Support is always available, day and night.

## Specialist Training for Residential Staff

All boarding and residential staff receive enhanced safeguarding training, including recognising affluent neglect, low-level concerns, and responding to out-of-hours disclosures. Our training meets the expectations of the **National Minimum Standards (2022)** and is regularly updated.

## 19. Additional Resources

Further advice and guidance on child protection and safeguarding can be accessed through the following organisations and websites:

- NSPCC – National Society for the Prevention of Cruelty to Children  
[www.nspcc.org.uk](http://www.nspcc.org.uk)
- Childline – A free, confidential helpline offering support to children and young people  
[www.childline.org.uk](http://www.childline.org.uk)
- Anti-Bullying Alliance – Information and support on preventing and responding to bullying  
[www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- BeatBullying – Campaigns and advice aimed at tackling bullying  
[www.beatbullying.org](http://www.beatbullying.org)
- Childnet International – Resources and guidance for keeping children safe online  
[www.childnet.com](http://www.childnet.com)
- Thinkuknow – Advice for children, parents and professionals about staying safe online  
[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- UK Safer Internet Centre – Tools and support for online safety education and practice  
[www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Provision for Transgender Pupils – Guidance from the Department for Education on supporting transgender pupils in schools (November 2022)  
[DfE guidance link – Provision for Transgender Pupils](#)