



ST JOHN'S SCHOOL
SIDMOUTH, UNITED KINGDOM

Child Protection and Safeguarding Policy

Policy owner: Head of School

Approved by: Directors

Applies to: Whole school, including EYFS, Junior School, Senior School, boarding, day pupils, full boarders, flexi boarders, staff, volunteers, supply staff, agency staff, contractors, self-employed staff, peripatetic staff, Directors and others working on behalf of the school

Reviewed: September 2026

Next review due: September 2027

For regulatory purposes, references to Directors include the proprietor body where applicable.

Contents

Key Personnel

Devon Safeguarding Contacts

1. Safeguarding Statement
2. Terminology
3. Legal and Guidance Framework
4. Policy Principles, Aims and Values
5. Supporting and Protecting Children
6. Governance and Strategic Oversight
7. The Head of School
8. The Designated Safeguarding Lead
9. Deputy Designated Safeguarding Leads
10. Staff Responsibilities
11. Volunteers and Regulated Activity
12. Recognising Safeguarding Concerns
13. Responding to Safeguarding Concerns
14. Responding to a Disclosure
15. Recording Safeguarding Concerns
16. Making Referrals and Seeking External Advice
17. Parents and Carers
18. Child-on-Child Abuse
19. Children Who May Be Particularly Vulnerable
20. Supporting Staff Involved in Safeguarding Concerns
21. Technology, Cameras, Mobile Phones and Recording Devices
22. Whistleblowing and Unsafe Practice
23. Allegations Against Staff and Low-Level Concerns

24. Physical Intervention
25. Confidentiality, Information Sharing and Data Protection
26. Safeguarding Risks and Additional Considerations
27. Categories of Abuse
28. Affluent Neglect
29. Bullying, Cyberbullying and Prejudice-Based Incidents
30. Radicalisation and Extremism
31. Domestic Abuse
32. Exploitation, Including CSE, CCE and County Lines
33. Female Genital Mutilation
34. Forced Marriage, Honour-Based Abuse and the One Chance Rule
35. Mental Health and Safeguarding
36. Private Fostering
37. Looked-After and Previously Looked-After Children
38. Attendance, Absence and Children Missing Education
39. Child-on-Child Abuse, Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour
40. Pupils Who Are LGBTQ+ or Gender-Questioning
41. Online Safety
42. Making or Sharing Nudes and Semi Nudes
43. Additional Safeguarding Considerations for Boarders
44. Linked Policies and Procedures
45. Monitoring and Review

Key Personnel

Role	Name	Email	Telephone
Designated Safeguarding Lead (DSL)*	Jenni Yeoman	Jenni.yeoman@iesmail.com	01395 513984
Deputy DSLs*	Annabel Goody Luke Towe Kirstin Larby Claire Symonds Ross Bovingdon	annabel.goody@iesmail.com luke.towe@iesmail.com kirstin.larby@iesmail.com claire.symonds@iesmail.com ross.bovingdon@iesmail.com	01395 513984 01395 513984 01395 513984 01395 513984
Head of School	Nathan Jordan-Rowell	nathan.jordanrowell@iesmail.com	01395 513984
Online safety Coordinator in conjunction with the DSL	Gemayel Kroukamp	Gemayel.kroukamp@iesmail.com	Contact via school office
Directors*	Mónica Segovia (President) Darryll Lottering (Vice- President)	monica.segovia@iesmail.com Darryll.lottering@iesmail.com	Contact via school office

Safeguarding Governor	Caroline Williams	Caroline.williams@iesmail.com	Contact via school office
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**Out of hours contact details will be made available to staff*

Devon safeguarding contacts

For immediate danger or emergency: call 999.

Police non-emergency: call 101.

Devon Front Door / MASH

For urgent safeguarding concerns, or where a child may be at risk of significant harm, telephone Devon Front Door / MASH on: 0345 155 1071

Requests for support should be submitted using Devon's online Request for Support form. Where an urgent telephone referral is made, this should be followed up promptly with the online Request for Support form.

Out of hours

Emergency Duty Service: 0345 6000 388

Professional Consultation Line

The Professional Consultation Line is for professional use only. The current number is held in the school's staff-only Safeguarding Contacts and Reporting Routes Appendix and should be checked regularly by the DSL.

The Professional Consultation Line should be used for advice and guidance where the concern cannot be handled through another route. If the concern requires urgent response, staff must telephone the Front Door / MASH on 0345 155 1071.

LADO

Where there is a concern or allegation about an adult working with children which may meet the harm threshold, the Head of School, case manager or other appropriate senior person should follow Devon LADO procedures.

Devon LADO telephone: 01392 384964

Early Help

The current single Early Help Partnership mailbox:
business.earlyhelppartnership-mailbox@devon.gov.uk

1. Safeguarding statement

St John's School recognises its moral and statutory responsibility to safeguard and promote the welfare of all pupils. This includes pupils in EYFS, Junior School, Senior School, day pupils, full boarders and flexi boarders.

The school expects all staff, Directors, volunteers, supply staff, agency staff, contractors, self-employed staff, peripatetic staff and other adults working on behalf of the school to share this commitment.

Safeguarding is everyone's responsibility. All staff must act in the best interests of pupils and must take prompt action where they have any concern about a pupil's welfare, safety or wellbeing.

The school recognises that all children, regardless of age, disability, SEND, gender reassignment, race, religion or belief, sex, sexual orientation, background, family circumstances or boarding status, have an equal right to protection from harm. This includes harm that may occur at home, in school, in boarding, in the community, online or through technology.

St John's School aims to provide a safe, supportive and welcoming environment where pupils are respected, valued, listened to and taken seriously. The school is alert to signs of abuse, neglect, exploitation and other safeguarding concerns and follows clear procedures so that pupils receive timely and effective help, support and protection.

Pupils are taught how to seek help and are made aware of trusted adults they can speak to if they have a concern. The school listens to pupils and takes account of their wishes and feelings when deciding what action is needed, while always acting in their best interests.

Where there are concerns about a child's welfare, the school may need to share information and work with parents, carers, children's social care, police, health services, local authority services, the LADO, safeguarding partners or other agencies.

The school will usually seek to discuss safeguarding concerns with parents or carers where it is appropriate and safe to do so. The school will not do so where this may place the child at increased risk, compromise a police or children's social care response, interfere with evidence, or otherwise be contrary to the child's best interests.

This policy underpins and guides safeguarding practice across the school. It applies whenever staff or other adults are working with or interacting with pupils, including on school premises, in boarding, in EYFS, during educational visits, during fixtures, online, off site and during school-related activities.

This policy should be read alongside the school's staff-only safeguarding procedures and the policies listed at the end of this document.

2. Terminology

Safeguarding and promoting the welfare of children means:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing 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 part of safeguarding. It refers to the action taken to protect specific children who are suffering, or are likely to suffer, significant harm.

A child means anyone under the age of 18.

Pupil means any child on roll at St John's School, including EYFS children, Junior School pupils, Senior School pupils, day pupils, full boarders and flexi boarders.

Staff means all adults working in or on behalf of the school, including employees, workers, supply staff, agency staff, contractors, self-employed staff, peripatetic staff, visiting professionals, volunteers, students on placement, work experience adults and Directors where applicable.

Parents means birth parents and other adults in a parenting role, including step-parents, foster carers, adoptive parents, educational guardians and local authority corporate parents where applicable.

DSL means the Designated Safeguarding Lead.

DDSL means Deputy Designated Safeguarding Lead.

Directors means those responsible for governance of the school. For regulatory purposes, references to Directors include the proprietor body where applicable.

Safeguarding governor means the Director or governor with nominated safeguarding oversight.

Head of School means the Head of School at St John's School.

LADO means the Local Authority Designated Officer.

Children's social care means the local authority service responsible for children's statutory social care.

KCSIE means Keeping Children Safe in Education.

EYFS means the Early Years Foundation Stage.

3. Legal and guidance framework

This policy has been prepared with regard to current legislation, statutory guidance and relevant non-statutory guidance, including:

- Keeping Children Safe in Education
- Working Together to Safeguard Children
- Education (Independent School Standards) Regulations 2014
- Statutory framework for the Early Years Foundation Stage
- National Minimum Standards for Boarding Schools
- Prevent duty guidance
- Information Sharing: Advice for practitioners providing safeguarding services
- What to do if you're worried a child is being abused
- Working Together to Improve School Attendance
- Children Missing Education statutory guidance
- Searching, Screening and Confiscation guidance
- Relationships Education, Relationships and Sex Education and Health Education statutory guidance
- Teaching Online Safety in Schools
- Filtering and Monitoring Standards for Schools and Colleges
- Cyber Security Standards for Schools and Colleges
- Mental Health and Behaviour in Schools
- Promoting and Supporting Mental Health and Wellbeing in Schools and Colleges
- Teachers' Standards
- Equality Act 2010
- UK GDPR and Data Protection Act 2018
- Data Protection Act 2018 safeguarding provisions
- Disclosure and Barring Service guidance
- Childcare disqualification statutory guidance
- Female Genital Mutilation Act 2003
- Forced Marriage and honour-based abuse guidance
- Serious violence, criminal exploitation and county lines guidance
- Local safeguarding arrangements and procedures issued by Devon safeguarding partners
- Crime and Policing Act 2026, insofar as it amends regulated activity arrangements for people working or volunteering with children
- Information sharing duty statutory guidance, where in force, and current DfE information sharing guidance for safeguarding practitioners

The school will review this policy annually and sooner where there is a significant safeguarding concern, change in law, statutory guidance, local safeguarding procedures, inspection expectations or school provision.

4. Policy principles, aims and values

The welfare of the child is paramount.

All pupils have an equal right to protection, safeguarding and support.

Safeguarding is everyone's responsibility.

All staff have a duty to identify concerns early, provide help and support, report concerns promptly and take action to prevent risk from escalating.

The school will act in the best interests of the child while taking account of the child's wishes and feelings.

Safeguarding includes protection from abuse, neglect, exploitation, online harm, extra-familial harm, child-on-child abuse, harmful sexual behaviour, radicalisation, domestic abuse, mental health-related safeguarding concerns and other risks to welfare.

The school recognises that harm may occur in the home, in school, in boarding, online, in peer groups, in the community or in other settings.

The school recognises that children may not always feel ready or able to disclose abuse, neglect or exploitation. Children may feel ashamed, frightened, confused, threatened, loyal to the person causing harm, worried about consequences or unaware that their experiences are abusive.

The school recognises that behaviour, attendance, presentation, mental health, relationships, work, communication, creative work or changes in mood may indicate a safeguarding concern.

The school will not assume that a concern is not serious because a child has not made a direct disclosure.

The school will respond to safeguarding concerns in a trauma-informed, child-centred and proportionate way.

The school will ensure that pupils and staff involved in safeguarding concerns receive appropriate support, guidance and supervision.

This policy aims to:

- make safeguarding expectations clear for all staff and adults working on behalf of the school
- ensure staff understand their duties to safeguard and promote the welfare of pupils
- ensure concerns are identified, reported, recorded and acted on promptly
- ensure staff understand how to respond to disclosures and concerns
- ensure staff understand how to report concerns about adults, including low-level concerns and allegations
- ensure the DSL and DDSs have the authority, training, time, support and resources needed to carry out their role
- ensure pupils know how to seek help and feel confident that they will be listened to
- ensure safeguarding is embedded in the curriculum, pastoral care, boarding, EYFS, online safety and wider school life
- ensure effective links with children's social care, police, health services, local authority services, the LADO, safeguarding partners and other external agencies

- ensure child protection records are accurate, secure and transferred appropriately when pupils move school
- ensure the school meets its safeguarding duties under KCSIE, the Independent School Standards, EYFS and the National Minimum Standards for Boarding Schools
- ensure the school recruits safely, maintains a compliant Single Central Record and meets current regulated activity requirements
- ensure filtering and monitoring arrangements are understood, reviewed and effective
- ensure safeguarding practice is reviewed, monitored and improved

5. Supporting and protecting children

St John's School will support pupils by:

- creating a safe, stable and supportive environment
- building trusted relationships between pupils and staff
- promoting self-esteem, confidence and resilience
- making sure pupils know which adults they can speak to
- providing clear ways for pupils to report concerns
- listening to pupils and taking what they say seriously
- responding sensitively to distress, anxiety or requests for support
- providing pastoral support and signposting to specialist help where appropriate
- supporting pupils who may need Early Help
- making timely referrals to children's social care where thresholds are met
- working with parents and carers where it is safe and appropriate to do so
- working with external agencies and safeguarding partners
- supporting pupils with emerging mental health needs
- supporting pupils with SEND, EAL, medical needs, disabilities or communication needs
- supporting pupils in boarding and recognising the additional safeguarding considerations that may arise when pupils live away from home
- teaching pupils about safeguarding, relationships, consent, online safety, risk, respectful behaviour, reporting concerns and how to seek help
- reassuring victims that they will be listened to, taken seriously, kept safe and supported

The school community will protect pupils by:

- maintaining a culture in which safeguarding is understood and prioritised
- ensuring staff remain alert to abuse, neglect, exploitation and other safeguarding concerns
- ensuring staff maintain professional curiosity and an attitude of "it could happen here"
- ensuring staff report and record concerns without delay
- challenging low expectations, victim-blaming language or assumptions that minimise risk

- ensuring child-on-child abuse is never dismissed as banter, teasing, friendship issues or part of growing up
- embedding safeguarding, including online safety, across the curriculum
- consulting pupils, parents and staff where appropriate to understand safeguarding culture
- reviewing safeguarding records, concerns, patterns and themes
- reviewing the effectiveness of safeguarding arrangements, including filtering and monitoring
- acting without delay where safeguarding weaknesses are identified

6. Governance and strategic oversight

The Directors have overall responsibility for ensuring that the school has effective safeguarding arrangements in place.

For regulatory purposes, references to Directors include the proprietor body where applicable.

The Directors will ensure that:

- safeguarding and child protection are central to the school's culture, leadership and practice
- the school has an effective Safeguarding and Child Protection Policy which is reviewed at least annually and published as required
- the school's safeguarding arrangements comply with KCSIE, the Independent School Standards, EYFS and the National Minimum Standards for Boarding Schools
- there is a named safeguarding governor with appropriate knowledge, skills and oversight
- safeguarding policies and procedures are effective, understood and implemented
- the school has an effective Staff Code of Conduct
- there are clear procedures for managing allegations and low-level concerns about adults
- there are effective arrangements for safer recruitment, pre-appointment checks and the Single Central Record
- at least one person involved in each recruitment process has completed appropriate safer recruitment training
- the DSL is a member of the senior leadership team
- the DSL and DDSs have the time, funding, training, resources and support needed to carry out their roles
- staff receive safeguarding and child protection training at induction and regular updates thereafter
- all staff read Part One of KCSIE and receive support to understand their responsibilities
- appropriate filtering and monitoring systems are in place, understood by relevant staff and reviewed regularly

- online safety is integrated into safeguarding, curriculum and staff training arrangements
- pupils are taught about safeguarding, including online safety, through a broad and balanced curriculum
- pupils have accessible routes to report concerns
- safeguarding arrangements in boarding are effective and meet the National Minimum Standards for Boarding Schools
- safeguarding arrangements in EYFS are effective and meet the statutory framework for the Early Years Foundation Stage
- child protection records are maintained appropriately and transferred securely when pupils move setting
- the school holds at least two emergency contact numbers for each pupil wherever reasonably possible
- procedures are in place for pupils who are absent from education, missing from education or missing from school or boarding
- the school makes referrals to external bodies where required, including the DBS and Teaching Regulation Agency where applicable
- safeguarding practice is monitored and reviewed
- any safeguarding weakness is addressed without delay

The safeguarding governor provides safeguarding oversight on behalf of the Directors. This includes oversight of safeguarding culture, safeguarding training, child protection arrangements, online safety, filtering and monitoring, safer recruitment, the Single Central Record, low-level concerns, allegations management and boarding safeguarding arrangements.

The safeguarding governor should normally be alerted where a safeguarding concern, low-level concern or allegation involves the Head of School, unless there is a clear conflict of interest or doing so would create an immediate safeguarding risk.

7. The Head of School

The Head of School is responsible for ensuring that safeguarding is embedded across the school's culture, systems, leadership and day-to-day practice.

The Head of School will:

- promote a whole-school culture of safeguarding
- ensure that the best interests of pupils are central to decision-making
- ensure that this policy is implemented effectively and followed by all staff
- ensure that the DSL and DDSs have sufficient time, training, support and resources
- ensure suitable cover arrangements are in place when the DSL is unavailable
- ensure pupils have accessible ways to report concerns and seek help
- ensure pupils are given opportunities to share their views and feedback about safety and wellbeing
- ensure staff understand that they must raise concerns about pupils and adults promptly

- ensure concerns about poor or unsafe safeguarding practice are handled in line with the Whistleblowing Policy
- act as case manager for allegations against staff and other adults where appropriate
- liaise with the LADO without delay where a concern or allegation may meet the harm threshold
- ensure individuals who pose a risk of harm to children are referred to the DBS where required
- ensure referral to the Teaching Regulation Agency is considered where appropriate
- ensure safeguarding, including online safety, is taught through the curriculum in an age-appropriate way
- ensure effective safer recruitment arrangements are in place
- ensure the school maintains a compliant Single Central Record
- ensure safeguarding arrangements in boarding are effective
- ensure safeguarding arrangements in EYFS are effective
- monitor the effectiveness of safeguarding arrangements with the DSL, senior leaders and Directors
- ensure safeguarding weaknesses are addressed without delay

Where a concern relates to the conduct of the Head of School, staff must report it to the safeguarding governor, President, Vice President or another designated Director in line with this policy, the Low-Level Concerns Policy, Whistleblowing Policy and allegations management procedures.

8. The Designated Safeguarding Lead

The DSL is a senior member of staff with lead responsibility for safeguarding and child protection.

The DSL will:

- promote a whole-school culture of safeguarding
- act in the best interests of pupils
- be available during school hours for staff to discuss safeguarding concerns
- ensure suitable arrangements are in place for safeguarding support when the DSL is unavailable
- act as the main point of contact with safeguarding partners and external agencies
- provide advice, support and challenge to staff
- make prompt decisions about safeguarding concerns
- make referrals to children's social care where appropriate
- make referrals to the police where appropriate
- make referrals to the Channel programme where appropriate
- liaise with the LADO where required
- support staff who make referrals directly
- understand and act on Early Help, Child in Need and Child Protection processes
- manage and oversee safeguarding records
- ensure safeguarding records are accurate, timely, factual and include clear chronologies and rationales for decisions

- ensure safeguarding, child protection and welfare concerns are recorded on CPOMS where appropriate
- ensure child protection files are transferred securely to a new school or setting within the required timescale
- request safeguarding records from previous schools or settings when pupils join St John's School
- share relevant safeguarding and contextual information with a new setting where appropriate
- keep the Head of School and safeguarding governor informed about significant safeguarding concerns, referrals, themes and risks
- lead on online safety with support from relevant staff
- understand and help review filtering and monitoring arrangements
- ensure concerns about filtering and monitoring are acted on
- promote early identification of mental health concerns
- ensure pupils are considered for Early Help and wider support where appropriate
- support staff to understand vulnerabilities linked to SEND, EAL, medical needs, mental health, boarding, domestic abuse, exploitation, attendance and other risk factors
- monitor safeguarding arrangements in boarding
- monitor safeguarding arrangements in EYFS where relevant
- ensure safeguarding training is delivered and recorded
- ensure all staff, including temporary staff and volunteers, receive safeguarding induction and regular safeguarding updates
- ensure staff read Part One of KCSIE and receive support to understand and apply their responsibilities
- ensure staff understand the school's reporting and recording systems
- ensure there are clear and accessible systems for pupils to report concerns
- report to Directors on safeguarding as required
- report at least annually on online safety, including filtering and monitoring

The DSL may delegate activities to DDSLs, but the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

9. Deputy Designated Safeguarding Leads

DDSLs are trained to the same level as the DSL and support the DSL in carrying out safeguarding duties.

DDSLs may:

- receive and respond to safeguarding concerns
- support staff with safeguarding advice
- make or support referrals where appropriate
- record actions and decisions on CPOMS
- support pupils affected by safeguarding concerns
- liaise with external agencies where appropriate
- support safeguarding training and awareness
- contribute to safeguarding reviews, audits and monitoring

In the absence of the DSL, a DDSL will take responsibility for safeguarding arrangements so that pupil safety and protection continue without disruption.

Where the DSL is absent for a longer period, the school will ensure that one DDSL or another appropriately trained senior member of staff has clear responsibility for safeguarding leadership, supported by the safeguarding team.

10. Staff responsibilities

All staff have a duty to safeguard and promote the welfare of children.

Staff must:

- maintain an attitude of “it could happen here”
- be professionally curious
- identify concerns early
- act on concerns promptly
- listen to pupils and take them seriously
- understand that children may not always disclose abuse verbally
- understand that absence, behaviour, mood, presentation, work, relationships or online activity may indicate safeguarding concerns
- understand that a lack of reported child-on-child abuse does not mean it is not happening
- recognise that children may face barriers to disclosure
- know how to respond if a pupil discloses abuse or harm
- avoid leading questions or investigation
- report concerns to the DSL or DDSL without delay
- record concerns accurately on CPOMS where appropriate
- support social workers and other professionals where needed
- follow this policy and associated safeguarding procedures
- follow the Staff Code of Conduct
- maintain appropriate professional boundaries
- complete safeguarding training and updates as required
- read Part One of KCSIE and any additional sections directed by the school
- understand the school’s safeguarding systems and reporting routes
- understand the school’s approach to online safety, filtering and monitoring
- recognise that pupils who are absent from education, missing from education or missing from school or boarding may be at risk of harm
- report concerns about adults, including low-level concerns, in line with the Low-Level Concerns Policy and allegations management procedures
- challenge decisions, delays or inaction where they believe a child is not being adequately protected
- escalate concerns where necessary

Staff must not assume that someone else will act. If a member of staff has a concern about a pupil, they must share it promptly with the DSL or DDSL.

If a member of staff believes that a child is at immediate risk of harm and the DSL or DDSL is not available, they must take immediate action, including contacting children's social care or the police where necessary. The DSL must be informed as soon as possible.

If a member of staff believes that safeguarding concerns are not being dealt with properly, or that poor or unsafe practice is being ignored, they must escalate the concern through the Head of School, DSL, safeguarding governor, President, Vice President, Whistleblowing Policy or an appropriate external body.

11. Volunteers and regulated activity

Volunteers are included in the school's safeguarding culture and must follow the school's safeguarding expectations, Staff Code of Conduct and relevant procedures.

The school will assess the role, duties, frequency and level of contact with pupils for each volunteer before they begin.

From 1 September 2026, the supervision exemption for volunteers is removed. This means that a volunteer who teaches, trains, instructs, cares for or supervises pupils will be in regulated activity if the activity is carried out frequently or meets the period condition, even where the volunteer is supervised.

For these purposes, the period condition includes activity on more than 3 days in a 30-day period, or overnight activity.

Volunteers in regulated activity must have an enhanced DBS check with children's barred list information before carrying out that activity, unless current statutory guidance permits a specific alternative and the school has approved this.

The school will not knowingly allow a barred person to carry out regulated activity.

Occasional volunteers who do not meet the frequency or period condition, such as parents helping at a one-off event or on a non-overnight day trip, may be checked and supervised in line with the nature of the activity, current guidance and the school's risk assessment.

Volunteer arrangements will be reviewed where a volunteer's role, frequency, duties or contact with pupils changes.

Some activities, including relevant personal care and certain healthcare activities, may constitute regulated activity regardless of frequency. The school will determine the appropriate level of check by reference to the nature and frequency of the role and current statutory guidance.

12. Recognising safeguarding concerns

Any child, in any family, in any school, can be affected by abuse, neglect, exploitation or other safeguarding concerns. Staff must always maintain an attitude of "it could happen here".

Safeguarding concerns are not always obvious. Abuse, neglect, exploitation and other forms of harm may overlap and may present in subtle, confusing or changing ways. Staff must remain professionally curious and must not dismiss concerns because they appear minor, isolated or unclear.

A child may be harmed by someone inflicting harm or by someone failing to act to prevent harm. Harm may be physical, emotional, sexual, psychological or caused by neglect. Harm may also arise from witnessing the abuse of others, including domestic abuse.

Children may be harmed by adults or by other children. Harm may occur at home, in school, in boarding, in EYFS, in peer groups, in the community, during school activities, during educational visits, online or through technology. Abuse may take place wholly online, or technology may be used to facilitate abuse in person.

Safeguarding concerns may include, but are not limited to:

- abuse and neglect
- child-on-child abuse
- sexual violence and sexual harassment
- harmful sexual behaviour
- sharing of nudes and semi-nudes
- bullying, including cyberbullying and prejudice-based bullying
- domestic abuse
- child sexual exploitation
- child criminal exploitation
- county lines
- modern slavery and trafficking
- serious violence
- gang involvement
- radicalisation and extremism
- online harm
- mental health-related safeguarding concerns
- children absent from education
- children missing from education
- children missing from home, care, school or boarding
- substance misuse
- fabricated or induced illness
- faith-based abuse
- female genital mutilation
- forced marriage
- honour-based abuse
- private fostering
- homelessness
- young carers
- children with a parent or carer in prison
- children affected by parental offending
- children affected by adult mental health difficulties, substance misuse or domestic abuse in the home

Staff must understand that disclosure is not always verbal. A child's behaviour, attendance, mood, appearance, relationships, communication, work, creative writing, drawings, online activity or presentation may give cause for concern.

Staff must not ignore concerns simply because there may be another possible explanation, such as bereavement, illness, family separation, friendship difficulties or stress. Where staff are unsure, they must speak to the DSL or a DDSL.

Staff may check in with a pupil using calm, gentle and open language. Staff should not investigate, interrogate or ask leading questions.

13. Responding to safeguarding concerns

All safeguarding concerns must be reported to the DSL or a DDSL without delay.

Staff must report concerns even where:

- the concern appears minor
- the concern is unclear
- the pupil has not made a direct disclosure
- the staff member is unsure whether the concern meets a threshold
- the concern relates to online behaviour or communication
- the concern relates to behaviour outside school
- the concern involves another pupil
- the concern involves a member of staff or another adult

Staff must not assume that someone else will act.

If a child is at immediate risk of harm, or if a crime may have been committed, urgent action must be taken. This may include contacting children's social care, the police or emergency services. Where a member of staff takes urgent action because the DSL or DDSL is not available, they must inform the DSL as soon as possible.

The DSL or DDSL will consider the concern, decide what action is needed and record the decision and rationale. This may include:

- speaking with the pupil where appropriate
- speaking with staff who know the pupil
- reviewing safeguarding, pastoral, attendance, behaviour, medical or boarding information
- considering whether the pupil may need Early Help
- consulting children's social care or local safeguarding partners
- making a referral to children's social care
- contacting the police
- contacting the LADO where the concern involves the conduct of an adult working with children
- considering support for the pupil and any other pupils affected
- considering whether parents or carers should be informed
- taking action under another relevant school policy

Staff must challenge or escalate any decision, delay or inaction where they believe a child is not being adequately protected.

14. Responding to a disclosure

If a pupil discloses abuse, neglect, exploitation or harm, staff must respond calmly and carefully.

Staff must:

- listen carefully
- allow the pupil to speak freely
- remain calm
- reassure the pupil that they have done the right thing by telling an adult
- take the pupil seriously
- make clear that the pupil is not to blame
- use open, non-leading prompts only where needed, such as “Tell me what happened” or “Can you tell me more about that?”
- avoid asking repeated questions
- avoid investigating or trying to establish proof
- avoid making assumptions or speculating
- avoid expressing shock, disgust or disbelief
- avoid asking why the pupil did not tell anyone earlier
- avoid promising confidentiality
- explain that the information will need to be shared with the DSL or DDSL so that the pupil can be helped and kept safe
- avoid discussing the disclosure with anyone who does not need to know
- report the disclosure to the DSL or DDSL without delay
- record the concern accurately on CPOMS as soon as possible

Staff must not examine injuries, ask a pupil to remove clothing, take photographs of injuries, view indecent images, ask the pupil to repeat the disclosure unnecessarily, contact parents or carers unless directed to do so by the DSL, or conduct their own investigation.

If a pupil wants to show an injury, staff should handle this sensitively and seek advice from the DSL or DDSL. Staff must preserve the pupil’s dignity and privacy and must not examine intimate areas.

15. Recording safeguarding concerns

Accurate and timely recording is essential.

Safeguarding, child protection and welfare concerns must be recorded on CPOMS where appropriate.

A record should be made as soon as possible, ideally immediately after the concern, conversation or disclosure. Staff should not delay reporting a concern because they have not yet completed the written record.

Records should include:

- the date and time of the concern
- the date and time of the record
- the location
- the name of the pupil
- the names of those present
- the nature of the concern
- the pupil's own words where relevant
- a clear factual summary
- any visible signs or observed behaviour
- any immediate action taken
- who the concern was reported to

Staff must:

- use clear and professional language
- record facts and observations
- distinguish fact from professional opinion where judgement is included
- avoid speculation
- avoid vague wording
- avoid emotive language
- use names rather than initials
- record the concern in the correct pupil record

Where more than one member of staff is involved in a concern, disclosure or incident, each staff member may be asked to provide their own record so that all relevant observations are captured.

The DSL and DDSs will record actions, decisions, referrals, advice received, outcomes and rationales on CPOMS where appropriate.

Administrative, attendance, behaviour, assessment, communication or other relevant records may be recorded on iSAMS where appropriate.

Safeguarding records may form part of statutory assessments, police enquiries, child protection processes, legal proceedings or inspection evidence. Staff must therefore record carefully, accurately and promptly.

16. Making referrals and seeking external advice

The DSL or DDS will normally make referrals to children's social care or other external agencies.

A referral must be made without delay where a child is suffering, or is likely to suffer, significant harm, or where the local threshold for statutory intervention is met.

The DSL or DDS will use local safeguarding thresholds and procedures when deciding whether to seek advice, request Early Help or make a referral.

Where the DSL or DDSL is unsure whether the threshold for referral is met, they should seek advice from children's social care or the appropriate local safeguarding consultation route.

Any member of staff may make a referral directly to children's social care or the police if they believe this is necessary and action has not been taken. A member of staff who makes a referral directly must inform the DSL as soon as possible.

If a child is at immediate risk of harm, staff must take immediate action. This may include calling 999.

Where a child's situation does not appear to improve following a referral, the DSL, DDSL or staff member who made the referral should follow up and, where necessary, press for reconsideration.

17. Parents and carers

The school will usually seek to discuss safeguarding concerns with parents or carers where this is appropriate and safe.

The decision about whether and when to contact parents or carers will normally be made by the DSL or DDSL.

Parents or carers should not be contacted before seeking safeguarding advice where doing so may:

- place the child at increased risk
- increase the risk to another person
- lead to evidence being destroyed or altered
- interfere with a police or children's social care response
- place staff at risk
- make the situation worse for the child
- create particular risk in cases involving familial sexual abuse, forced marriage, honour-based abuse, female genital mutilation, exploitation, trafficking, fabricated or induced illness, domestic abuse or other serious safeguarding concerns

Where appropriate, the DSL or DDSL will consult children's social care, police, the LADO or another relevant agency before parents or carers are contacted.

18. Child-on-child abuse

All reports and concerns about child-on-child abuse must be taken seriously.

Child-on-child abuse must never be dismissed as banter, teasing, friendship issues, "just having a laugh" or part of growing up.

Child-on-child abuse may include:

- bullying, including cyberbullying and prejudice-based bullying
- physical abuse

- sexual violence
- sexual harassment
- harmful sexual behaviour
- sharing of nudes and semi-nudes
- upskirting
- coercive or controlling behaviour in young relationships
- initiation or hazing-type violence or rituals
- abuse through technology
- abuse linked to protected characteristics

The school recognises that pupils may experience child-on-child abuse differently according to age, sex, SEND, disability, sexual orientation, gender reassignment, race, religion or belief, boarding status, vulnerability, previous trauma or other circumstances.

The school will respond to child-on-child abuse in line with KCSIE, this policy, the Behaviour Management Policy, Anti-Bullying Policy, Online Safety Policy and any relevant child-on-child abuse procedures.

The school will consider the needs and safety of all pupils involved, including the victim, alleged perpetrator and any other affected pupils.

The school will consider whether a risk assessment, safety plan, pastoral support, behaviour response, referral to children's social care, police contact or specialist advice is needed.

19. Children who may be particularly vulnerable

Any child may be vulnerable to abuse, neglect, exploitation or harm. Some children may face additional barriers to being heard, believed, understood, protected or supported.

Staff must be particularly alert to pupils who:

- have SEND, whether or not they have an Education, Health and Care Plan
- have a disability or certain health conditions
- have communication needs
- have mental health needs
- are young carers
- are looked after or previously looked after
- have returned home from local authority care
- are privately fostered
- are frequently absent from education, home, care, school or boarding
- have experienced suspensions or are at risk of exclusion
- are at risk of child sexual exploitation or child criminal exploitation
- are at risk of modern slavery, trafficking or county lines
- are at risk of radicalisation or extremism
- are at risk of domestic abuse
- are affected by parental offending or have a parent or carer in prison
- live in a family environment affected by domestic abuse, adult mental health difficulties or substance misuse

- are misusing alcohol or other drugs
- are at risk of honour-based abuse, female genital mutilation or forced marriage
- are experiencing homelessness or housing instability
- are affected by bereavement, trauma, family breakdown or significant change
- are boarders living away from home
- are new to the school, new to the UK or learning English as an additional language

Staff must not assume that indicators of abuse, neglect or exploitation are simply linked to a pupil's SEND, disability, medical need, communication need, culture, language, behaviour or family circumstances.

Reasonable adjustments must be made so that pupils can be listened to, supported and protected.

20. Supporting staff involved in safeguarding concerns

The school recognises that safeguarding work can be distressing and emotionally demanding.

Staff involved in safeguarding concerns, disclosures, child protection processes, allegations or serious incidents may be offered appropriate support.

Support may include:

- a discussion with the DSL or DDSL
- support from a line manager or senior leader
- supervision where appropriate
- signposting to staff wellbeing support
- occupational health advice where appropriate
- external counselling or support services where appropriate

Staff should seek support if they feel anxious, distressed, unsure or affected by a safeguarding matter.

Support for staff must not compromise confidentiality, safeguarding records, investigations or the welfare of pupils.

21. Technology, cameras, mobile phones and recording devices

The school recognises the safeguarding risks associated with technology, cameras, mobile phones, smart devices, wearable devices, recording equipment, online platforms and artificial intelligence.

Staff must follow the Staff Code of Conduct, Online Safety Policy, Acceptable Use Policy: Staff, Data Protection Policy, EYFS Mobile Phones, Cameras and Recording Devices Appendix and any relevant staff-only procedures.

Staff must not photograph, film or record pupils except for clear, authorised school purposes.

School devices should be used wherever possible.

Personal devices must not be used to photograph, film or record pupils unless there is an exceptional school reason, this has been authorised and the image or recording is transferred to a school system and deleted from the personal device as soon as possible.

Images and recordings must never be taken, stored or shared for personal use.

Images and recordings must not be shared through personal accounts or unauthorised platforms.

Photography or filming must never take place in areas where pupils are changing, washing or receiving intimate care.

Staff must not use mobile phones or smart devices in a way which distracts from pupil supervision, compromises safeguarding or creates a professional concern.

In EYFS, personal mobile phones, cameras and recording devices must not be used in areas where children are present, except where expressly permitted by the EYFS Mobile Phones, Cameras and Recording Devices Appendix for a specific safeguarding, emergency or authorised school purpose.

Visitors, volunteers, contractors and parents must not take photographs, film or record pupils unless this is permitted by school arrangements and supervised or authorised as appropriate.

The school will inform parents and carers about the apps, platforms, websites, software and digital tools that pupils are asked to use for school purposes where appropriate.

Generative AI and automated content tools must not be used in ways that compromise safeguarding, confidentiality, data protection, pupil welfare, academic integrity or professional boundaries.

Educational AI tools may only be used where approved by the school and subject to appropriate safeguarding, data protection, filtering and monitoring arrangements.

22. Whistleblowing and unsafe practice

Children cannot be expected to raise concerns in an environment where adults do not do so.

All staff have a duty to raise concerns about poor or unsafe safeguarding practice, failures in safeguarding arrangements, the handling of child protection concerns, the conduct of staff or the safeguarding culture of the school.

Concerns should be raised in line with the Whistleblowing Policy.

Where a concern relates to safeguarding practice or the conduct of an adult working with children, this may involve the DSL, Head of School, safeguarding governor, President, Vice President, LADO or another appropriate external body.

Where a concern relates to the conduct of the Head of School, it should be reported to the safeguarding governor, President, Vice President or another designated Director.

Nothing in this policy prevents a member of staff from contacting children's social care, the LADO, police, ISI, Ofsted, the NSPCC whistleblowing advice line or another appropriate external body where they reasonably believe this is necessary.

23. Allegations against staff and low-level concerns

The school promotes a culture of openness, trust and professional accountability.

All staff must report concerns about the conduct of adults working in or on behalf of the school. This includes employees, supply staff, agency staff, volunteers, contractors, self-employed staff, peripatetic staff, visiting professionals, Directors and any other adult working with pupils.

A concern or allegation may meet the harm threshold where it is alleged that an adult has:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates 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

Concerns or allegations that may meet the harm threshold must be reported immediately to the Head of School.

Where the concern relates to the Head of School, it must be reported to the safeguarding governor, President, Vice President or another designated Director.

The school will consult the LADO within one working day where an allegation may meet the harm threshold, including where there is doubt or advice is needed.

Staff must not investigate allegations themselves.

The school will follow KCSIE, local LADO procedures, the Safeguarding and Child Protection Policy and allegations management procedures.

Low-level concerns are concerns about an adult's behaviour which do not meet the harm threshold but may be inconsistent with the Staff Code of Conduct, including conduct outside work.

Low-level concerns must be reported in line with the Low-Level Concerns Policy.

Low-level concerns are recorded, reviewed and monitored so that patterns can be identified and addressed.

24. Physical intervention

The school recognises that there may be rare occasions where staff need to use reasonable force or physical intervention to keep pupils or others safe.

Physical intervention must only be used where it is reasonable, necessary and proportionate in the circumstances.

The school's approach prioritises prevention, de-escalation and the use of the minimum intervention necessary for the shortest possible time.

Physical intervention may be used only where there is no safer, reasonable alternative and where it is necessary to prevent a pupil from harming themselves, harming another person, committing an offence, causing serious damage to property or seriously disrupting good order.

Any use of physical intervention must be reported and recorded in line with school procedures.

Where physical intervention gives rise to a safeguarding concern, welfare concern, injury or complaint, the DSL and Head of School must be informed.

Parents will normally be informed of significant incidents involving physical intervention unless doing so would place the child at increased risk or compromise safeguarding action.

Staff should receive appropriate training where their role may require physical intervention or de-escalation.

Physical contact may be appropriate in some circumstances, including first aid, personal care, PE, music, practical teaching, safety, or brief reassurance where this is suitable for the pupil and context. Staff must use professional judgement, respect the pupil's dignity and wishes, maintain appropriate boundaries and follow the Staff Code of Conduct.

Any concern about physical intervention, restraint, touch or professional boundaries must be reported to the DSL or Head of School.

25. Confidentiality, information sharing and data protection

The school recognises that effective safeguarding requires timely and appropriate information sharing.

Data protection law does not prevent the sharing of information where this is necessary and proportionate to safeguard or promote the welfare of a child.

Confidentiality must never prevent action to protect a child from harm.

Staff must share safeguarding concerns with the DSL or DDSL without delay.

Information should be shared on a need-to-know basis, securely and with regard to the best interests of the child.

The DSL or DDSL will decide what information should be shared with parents, carers, external agencies, children's social care, police, health services, local authority services, the LADO, safeguarding partners or other professionals, unless urgent action is required.

Staff must not promise confidentiality to pupils. Staff should explain, in an age-appropriate way, that information may need to be shared with the DSL or DDSL so that the pupil can be helped and kept safe.

Safeguarding records will be held securely and separately from the main pupil file, with access restricted to those who need it for safeguarding or welfare purposes.

Safeguarding, child protection and welfare concerns are recorded on CPOMS where appropriate.

Administrative, attendance, behaviour, assessment, communication or other relevant records may be recorded on iSAMS where appropriate.

When a pupil moves to a new school or setting, the child protection file will be transferred securely to the receiving school or setting's DSL within the required timescale. Confirmation of receipt will be obtained.

Parental consent is not required to transfer safeguarding records to a new school or setting, although parents may be informed where this is appropriate and safe.

Fears about sharing information must not stand in the way of safeguarding and promoting the welfare of children.

26. Safeguarding risks and additional considerations

This section summarises key safeguarding risks and additional considerations relevant to St John's School.

It should be read alongside KCSIE, Working Together to Safeguard Children, the EYFS statutory framework, the National Minimum Standards for Boarding Schools, local safeguarding procedures, the school's staff-only safeguarding procedures and the school's linked policies.

The examples below are not exhaustive. Staff must report any concern about a pupil's welfare, safety or wellbeing to the DSL or DDSL without delay, even where the concern does not fit neatly into one category.

Safeguarding risks apply equally to pupils in EYFS, Junior School, Senior School and boarding. Boarders may face additional risks linked to living away from home, overnight supervision, privacy, family contact, peer relationships, isolation, emotional wellbeing and access to trusted adults outside normal school hours.

27. Categories of abuse

Abuse and neglect are forms of maltreatment. A child may be harmed by someone inflicting harm or by someone failing to act to prevent harm.

The main categories of abuse are:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

Abuse may be perpetrated by adults or by other children. It may take place in the home, in school, in boarding, in the community, online or through a combination of online and offline contact.

Physical abuse may include hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. It may also include fabricated or induced illness.

Emotional abuse is the persistent emotional maltreatment of a child which causes severe and adverse effects on the child's emotional development. It may include conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet another person's needs. It may also include serious bullying, cyberbullying, exploitation, seeing or hearing domestic abuse, or causing a child to feel frightened, humiliated or unsafe.

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It may involve physical contact or non-contact activities, including exposure to sexual activity, grooming, sexual exploitation, creating or sharing sexual images, or abuse facilitated by technology.

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of the child's health or development. It may include failing to provide adequate food, clothing, shelter, supervision, medical care, emotional warmth, education or protection from harm.

Indicators of abuse may include:

- unexplained or frequent injuries
- changes in behaviour, mood or presentation
- withdrawal, anxiety, aggression or fearfulness
- low self-esteem or loss of confidence
- self-harm or risk-taking behaviour
- age-inappropriate sexual knowledge or behaviour
- poor hygiene, hunger or tiredness
- untreated medical needs
- persistent absence or poor attendance
- fear of going home or being around certain people
- substance misuse

- evidence of exploitation

The presence of an indicator does not prove abuse. The absence of an indicator does not mean a child is safe. Staff must record and report concerns so that patterns can be identified.

28. Affluent neglect

St John's School recognises that neglect can occur in any family, including affluent families.

Affluent neglect may include emotional unavailability, limited parental supervision, over-reliance on paid care, excessive academic pressure, lack of boundaries, isolation, limited family connection, or failure to recognise emotional, mental health or safeguarding needs.

Boarders may be particularly vulnerable where parental oversight is limited, family contact is inconsistent or emotional needs are less visible.

Staff must not assume that a pupil is safe because they appear materially well provided for. Concerns about emotional neglect, supervision, isolation, mental health, risk-taking behaviour, family absence or lack of support must be reported to the DSL or DDSL.

29. Bullying, cyberbullying and prejudice-based incidents

Bullying can be a safeguarding concern, particularly where it is persistent, severe, discriminatory, sexualised, coercive, online, linked to power imbalance, or forms part of a wider pattern of child-on-child abuse.

Bullying may include:

- physical bullying
- verbal bullying
- emotional or relational bullying
- cyberbullying
- sexualised bullying
- racist bullying
- sexist bullying
- homophobic, biphobic or transphobic bullying
- bullying related to SEND, disability, appearance, religion, culture, language, nationality, family circumstances or perceived difference

All bullying concerns must be taken seriously, recorded and responded to in line with the Anti-Bullying Policy, Behaviour Management Policy and this policy.

Racist, discriminatory or prejudice-based incidents must be challenged, recorded and monitored. The school will consider whether any such incident also raises safeguarding, child-on-child abuse, online safety, mental health, behaviour or equality concerns.

Safeguarding, child protection and welfare concerns are recorded on CPOMS where appropriate. Behaviour, sanction, attendance, communication or administrative records may be recorded on iSAMS where appropriate.

30. Radicalisation and extremism

The school recognises its duty to have due regard to the need to prevent pupils from being drawn into terrorism.

Preventing radicalisation is part of the school's wider safeguarding responsibilities. It is not separate from child protection.

Radicalisation may occur online, offline or through a combination of both. Pupils may be vulnerable because of identity issues, isolation, trauma, discrimination, grievance, family or peer influence, exposure to extremist material, social pressure, grooming, criminal exploitation, mental health needs or SEND.

Concerns may include:

- accessing extremist material
- expressing support for violence or terrorism
- attempting to contact extremist groups
- using extremist language or symbols
- significant changes in behaviour, secrecy or online activity
- withdrawal from friends or family
- expressing hatred towards particular groups
- talking about causing harm in the name of a cause or ideology

These indicators do not prove radicalisation, but they must be reported to the DSL or DDSL.

The DSL will consider the concern, seek advice where appropriate and make a Prevent referral where required. Where a pupil is at immediate risk of harm, staff must call 999.

The school supports pupils through the curriculum, including PSHE, Relationships Education, Relationships and Sex Education and Health Education, online safety, critical thinking, respect, democratic values and safe discussion.

31. Domestic abuse

Domestic abuse is a safeguarding concern. Children can be victims of domestic abuse in their own right where they see, hear or experience the effects of abuse, or where they are affected by abusive behaviour in their own intimate relationships.

Domestic abuse may include physical, emotional, psychological, sexual, financial, economic, coercive or controlling behaviour. It may occur between adults in the home or in young people's own relationships. Domestic abuse may also include child to parent or caregiver abuse. This can involve physical, emotional, psychological, coercive, controlling or financially abusive behaviour by a child towards a parent or caregiver. Staff should recognise that

families may find this difficult to disclose and that the behaviour may indicate wider safeguarding, SEND, mental health or family support needs.

Children affected by domestic abuse may present with:

- anxiety, withdrawal or aggression
- tiredness, poor concentration or sleep difficulties
- regression or changes in behaviour
- reluctance to go home
- over-compliance or excessive reassurance-seeking
- changes in attendance or attainment
- physical symptoms or emotional distress

Staff must report concerns about domestic abuse to the DSL or DDSL without delay.

Staff must not approach the family directly unless advised to do so by the DSL or DDSL. The DSL or DDSL will decide whether to seek advice, make a referral, offer support or take other safeguarding action.

The school participates in Operation Encompass where applicable. Information received through Operation Encompass will be handled sensitively and shared only with those who need to know in order to support and safeguard the pupil.

32. Exploitation, including CSE, CCE and county lines

Child sexual exploitation and child criminal exploitation are forms of child abuse.

Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, deceive or groom a child into sexual or criminal activity. The child may appear to receive something in exchange, such as affection, money, gifts, status, protection, accommodation, substances or perceived friendship.

A child may not recognise that they are being exploited.

Exploitation may be:

- online or offline
- one-off or repeated
- perpetrated by adults or children
- linked to gangs, organised crime, county lines, sexual abuse, trafficking, modern slavery or serious violence

Indicators may include:

- going missing from school, home, care or boarding
- being found far from home
- unexplained money, gifts, clothing or phones
- associating with older people or concerning peer groups
- changes in mood, appearance or behaviour

- secrecy around online activity or relationships
- substance misuse
- involvement in crime
- unexplained injuries
- sexualised behaviour or language
- fearfulness, intimidation or reluctance to speak
- disengagement from education

All concerns about exploitation must be reported to the DSL or DDSL without delay.

The DSL or DDSL will consider local exploitation procedures, seek advice where appropriate and make referrals to children's social care, police or other agencies where required.

Where there are concerns about absence, missing episodes or repeated lateness, exploitation must always be considered.

33. Female genital mutilation

Female genital mutilation is child abuse and is illegal in the UK.

FGM includes procedures involving partial or total removal of the external female genitalia, or other injury to female genital organs, for non-medical reasons.

Staff must be alert to indicators that FGM may be planned or may have taken place, including:

- talk of a special ceremony
- plans for extended travel abroad
- family or community pressure
- a pupil saying they are going to be "cut" or prepared for marriage
- prolonged absence from school
- difficulty walking, sitting or standing
- pain or discomfort
- repeated urinary or menstrual difficulties
- withdrawal, anxiety or sudden change in behaviour

Staff must not examine a pupil for signs of FGM.

Teachers have a mandatory duty to report personally to the police where, in the course of their professional duties, they discover that an act of FGM appears to have been carried out on a girl under 18. This duty cannot be transferred to the DSL, although the DSL should be informed.

Concerns that a pupil may be at risk of FGM, or concerns that fall outside the mandatory reporting duty, must be reported immediately to the DSL or DDSL and handled in line with safeguarding procedures.

Where a pupil is at immediate risk, staff must call 999.

34. Forced marriage, honour-based abuse and the one chance rule

Forced marriage is a safeguarding concern and a serious abuse of human rights. It involves a person being forced, threatened or coerced into marriage without free and full consent.

Forced marriage is different from arranged marriage. In an arranged marriage, families may assist with choosing a partner, but the individuals have free choice and consent.

Honour-based abuse includes abuse committed to protect or defend perceived family or community honour. It may include physical, emotional, psychological, sexual or financial abuse and may be linked to forced marriage, FGM, domestic abuse, coercive control, family surveillance or restrictions on freedom.

Staff must be alert to indicators such as:

- sudden restrictions on freedom
- family control of friendships, clothing, phone use or travel
- fear of relatives or community members
- plans for travel abroad
- absence following overseas travel
- talk of marriage, ceremonies or family expectations
- withdrawal, anxiety or distress
- concerns raised by the pupil or peers

All concerns about forced marriage or honour-based abuse must be reported immediately to the DSL or DDSL.

Staff must not contact family members, attempt mediation or alert the community. Doing so may increase risk.

Staff must remember the one chance rule. They may have only one opportunity to speak to a pupil at risk and one chance to act to protect them.

Where there is immediate risk, staff must call 999.

35. Mental health and safeguarding

Mental health concerns may, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect, exploitation or other harm.

Only appropriately trained professionals can diagnose mental health conditions, but all staff are well placed to observe changes in behaviour, mood, attendance, relationships, presentation, work or engagement.

Concerns may include:

- withdrawal or isolation
- anxiety, panic or low mood

- anger, aggression or emotional dysregulation
- self-harm
- suicidal thoughts
- eating difficulties
- substance misuse
- sudden changes in behaviour or appearance
- loss of interest or motivation
- trauma responses
- significant changes in attendance or attainment

Where staff have a concern about a pupil's mental health, they must report this to the DSL or DDSL.

Where a pupil expresses suicidal thoughts, discloses self-harm or appears at immediate risk, this must be treated as an urgent safeguarding concern.

The school may provide pastoral support, consider Early Help, work with parents or carers where appropriate, seek advice from external professionals, make referrals to specialist services, or take emergency action where needed.

Children with medical conditions

Children with medical conditions may be more vulnerable to safeguarding risks and may experience additional barriers to recognising, reporting or being protected from harm.

Staff should be alert to changes in a pupil's medical presentation, attendance, emotional wellbeing, behaviour or engagement and should consider whether these may indicate an underlying safeguarding concern.

Staff must not assume that an injury, change in presentation or behaviour is solely attributable to a known medical condition.

The school will ensure that relevant medical and safeguarding information is shared appropriately between staff, parents, health professionals and other agencies where necessary to safeguard the pupil.

Any safeguarding concern relating to a pupil with a medical condition must be reported to the DSL or DDSL.

36. Private fostering

A private fostering arrangement occurs where a child under 16, or under 18 if disabled, is cared for for 28 days or more by someone who is not a parent, person with parental responsibility or close relative.

Private fostering may include pupils living with host families, family friends or other adults because parents live overseas, work away, are unable to care for the child, or have made informal arrangements.

Children living in residential schools or care placements arranged by the local authority are not privately fostered for these purposes.

Staff should be alert to possible private fostering where a pupil:

- says they are living with someone other than a parent or close relative
- is unclear about who has parental responsibility
- refers to “family friends”, “aunties” or “uncles” who may not be close relatives
- has parents living overseas
- has unclear care or guardian arrangements

If staff become aware of, or suspect, a private fostering arrangement, they must inform the DSL or DDSL without delay.

The DSL or DDSL will notify the local authority as required so that statutory checks and support can be considered.

37. Looked-after and previously looked-after children

Looked-after and previously looked-after children may face additional safeguarding and welfare challenges.

The school will promote the educational achievement, welfare and emotional wellbeing of looked-after and previously looked-after pupils.

Staff will be alert to risks including:

- attachment difficulties
- trauma
- placement instability
- exploitation
- attendance concerns
- mental health needs
- peer relationship difficulties
- contact arrangements
- changes in behaviour or emotional presentation

The school will ensure that appropriate staff have relevant information about a looked-after child’s legal status, care arrangements, delegated authority, contact arrangements and support needs, where this is necessary to safeguard and support the pupil.

The Designated Teacher will promote the educational achievement of looked-after and previously looked-after pupils and liaise with social workers, carers, Virtual School Heads and other professionals where appropriate.

The DSL and Designated Teacher will work together where safeguarding, welfare, attendance, behaviour, SEND, mental health or pastoral concerns arise.

38. Attendance, absence and children missing education

Regular attendance is important for safeguarding and welfare.

Children who are absent from education, missing from education, missing from school, missing from boarding or repeatedly absent may be at risk of abuse, neglect, exploitation, radicalisation, forced marriage, FGM, mental health difficulties or other harm.

Staff must report concerns about absence, unexplained absence, persistent absence, missing episodes or patterns of concern to the DSL or DDSL.

The school will:

- monitor attendance and absence
- identify patterns and concerns
- maintain more than one emergency contact number for each pupil wherever reasonably possible
- work with parents and carers where appropriate
- consider whether absence may indicate safeguarding risk
- refer to the local authority where required
- take prompt action where a pupil is missing from school or boarding
- follow the Missing Child and Missing Pupil Policy where relevant

Attendance, absence and related communications may be recorded on iSAMS where appropriate. Safeguarding, child protection and welfare concerns are recorded on CPOMS where appropriate.

39. Child-on-child abuse, sexual violence, sexual harassment and harmful sexual behaviour

Children can abuse other children.

Child-on-child abuse must never be dismissed as banter, joking, teasing, relationship drama, friendship issues or part of growing up.

Child-on-child abuse may include:

- bullying, including cyberbullying and prejudice-based bullying
- physical abuse
- sexual violence
- sexual harassment
- harmful sexual behaviour
- sharing of nudes and semi-nudes
- upskirting
- abuse in young relationships
- coercive or controlling behaviour
- initiation or hazing-type violence or rituals
- online abuse
- abuse linked to protected characteristics

The school recognises that child-on-child abuse may be affected by power imbalance, age, development, SEND, disability, sex, sexual orientation, gender reassignment, race, religion or belief, status, popularity, boarding status, previous trauma or vulnerability.

Reports of child-on-child abuse will be taken seriously. Pupils who report abuse will be listened to, supported and kept safe.

The school will consider the needs and safety of all pupils involved, including the victim, alleged perpetrator and any other affected pupils.

Where there is a report of sexual violence, sexual harassment or harmful sexual behaviour, the DSL will consider:

- the wishes and feelings of the victim
- the nature of the incident
- the ages and developmental stages of the pupils involved
- any power imbalance
- whether the incident is one-off or part of a pattern
- whether there are ongoing risks
- any SEND, vulnerability or communication needs
- whether a risk assessment or safety plan is needed
- whether children's social care or police should be contacted
- how to protect pupils from further harm
- whether disciplinary, pastoral, educational or therapeutic responses are needed

Alleged perpetrators will also be supported and safeguarded where appropriate. Support for an alleged perpetrator does not minimise the experience of the victim.

All decisions, actions, risk assessments and rationales will be recorded.

40. Pupils who are LGBTQ+ or gender-questioning

Being lesbian, gay, bisexual, transgender, gender-questioning or exploring identity is not in itself a safeguarding concern.

The school recognises that LGBTQ+ pupils and gender-questioning pupils may face additional risks, including bullying, discrimination, isolation, mental health difficulties, online abuse, family rejection or barriers to seeking help.

Staff must create a culture where pupils feel safe, respected and able to speak to trusted adults.

Where a pupil is gender-questioning, the school will take a cautious, sensitive, individualised and safeguarding-led approach. The school will consider the pupil's wishes and feelings, age, maturity, mental health, SEND, family circumstances, peer relationships, safeguarding risks and any relevant professional guidance.

Parents will normally be involved in discussions about a pupil's welfare unless doing so would place the pupil at increased risk of significant harm.

Any safeguarding concern relating to an LGBTQ+ or gender-questioning pupil must be reported to the DSL or DDSL.

41. Online safety

Online safety is part of safeguarding.

The school recognises that pupils may experience harm through websites, apps, gaming, social media, messaging platforms, livestreaming, artificial intelligence tools, online forums, search results, image sharing, digital communication, wearable devices or emerging technologies.

Online risks include:

- content, including illegal, inappropriate or harmful material
- contact, including harmful interaction with others
- conduct, including online behaviour that increases risk or causes harm
- commerce, including scams, gambling, advertising, phishing or financial exploitation

Online harm may include bullying, grooming, sexual exploitation, criminal exploitation, radicalisation, harassment, abuse, sharing nudes or semi-nudes, exposure to pornography, self-harm content, suicide content, eating disorder content, misogynistic content, extremist material, hate content, coercion, threats, impersonation or financial exploitation.

The school has a separate Online Safety Policy and Acceptable Use Policies. These set out the school's approach to education, filtering, monitoring, technology use, incident response and acceptable conduct.

Staff receive online safety training, including filtering and monitoring expectations. Relevant staff understand their roles and responsibilities in relation to filtering and monitoring.

Pupils are taught about online safety through the curriculum in an age-appropriate way.

Safeguarding concerns involving online activity must be reported to the DSL or DDSL and recorded on CPOMS where appropriate.

The school will consider risks associated with generative AI as part of its online safety risk assessment and filtering and monitoring review.

The school will review the effectiveness of its filtering and monitoring provision at least once every academic year. The review will involve senior leadership, the DSL, IT support and the responsible governor and will consider the effectiveness of filtering and monitoring across relevant devices, systems and locations. The findings, checks and any resulting actions will be recorded.

42. Making or Sharing Nudes and Semi Nudes

Incidents involving the sharing of nudes or semi-nudes by pupils under 18 must be treated as safeguarding concerns.

Staff must not view, copy, print, forward, save, share or ask a pupil to show nude or semi-nude images or videos unless this is specifically authorised by the DSL in exceptional circumstances and in line with current guidance. All incidents involving the making or sharing of nudes or semi nudes require a safeguarding response, whether the sharing appears consensual or non consensual.

Staff must:

- refer the matter to the DSL or DDSL without delay
- not investigate the matter themselves
- not delete or forward the image or video
- not ask pupils to send or display the image or video
- preserve evidence where appropriate and safe to do so
- follow the DSL's instructions

The DSL will conduct an initial review and consider current UKCIS guidance, safeguarding risks, local procedures, police advice and whether children's social care or police involvement is required.

Immediate referral to police or children's social care should be considered where:

- an adult is involved
- there is coercion, grooming, exploitation, blackmail or threat
- the image or video is violent, abusive, degrading or extreme
- the pupil involved is under 13
- there is a significant age, power or vulnerability imbalance
- there is risk of immediate harm
- there are concerns about self-harm or suicidal ideation
- the incident is part of a wider pattern
- the image has been shared widely or publicly

Where the DSL decides that the matter can be managed internally, the rationale must be recorded and appropriate safeguarding, pastoral, educational and disciplinary action considered.

Parents or carers will usually be informed unless doing so would place a pupil at increased risk of harm.

43. Additional safeguarding considerations for boarders

St John's School recognises the additional safeguarding considerations that arise when pupils live away from home.

Boarders must be protected, supported and listened to at all times, including evenings, weekends, nights and periods outside the normal school day.

The school will ensure that:

- boarding staff understand safeguarding responsibilities

- boarding staff receive safeguarding training appropriate to their role
- boarders know how to raise concerns
- boarders have access to trusted adults
- out-of-hours safeguarding arrangements are clear
- pupil movement and absence from boarding are monitored
- missing boarder procedures are understood and followed
- privacy, dignity and supervision are balanced carefully
- staff follow safer working practice in boarding areas
- concerns arising in boarding are reported and recorded promptly
- patterns of concern are reviewed
- boarding safeguarding arrangements are monitored in line with the National Minimum Standards for Boarding Schools

Boarders may be particularly vulnerable to isolation, homesickness, peer pressure, bullying, online harm, harmful sexual behaviour, emotional neglect, family difficulties, exploitation or concerns that arise outside the normal school day.

Any safeguarding concern involving a boarder must be reported to the DSL or DDSL without delay and recorded on CPOMS where appropriate.

44. Linked policies and procedures

This policy should be read alongside the following school policies and procedures:

- Staff Code of Conduct
- Low-Level Concerns Policy
- Whistleblowing Policy
- Recruitment, Selection and Safer Recruitment Policy
- Behaviour Management Policy
- Anti-Bullying Policy
- Online Safety Policy
- Acceptable Use Policy: Staff
- Acceptable Use Policy: Pupils
- PSHE, Relationships Education, Relationships and Sex Education and Health Education Policy
- Missing Child and Missing Pupil Policy
- Educational Visits Policy
- Boarding policies and procedures
- EYFS Mobile Phones, Cameras and Recording Devices Appendix
- Administration of Medicines Policy
- Health and First Aid Policy
- Head Injury and Suspected Concussion Policy
- Mental Health Policy
- SEND and Inclusion Policy
- Looked After Children Policy
- Preventing Extremism Policy
- Visitors and Security Policy
- Risk Assessment Policy

- Restrictive Intervention Policy
- Data Protection Policy
- Records Retention Schedule
- Complaints Policy
- Staff Handbook

Any safeguarding concern must be acted on under this policy, even where another policy is also relevant.

45. Monitoring and review

The school will monitor the effectiveness of safeguarding arrangements through:

- safeguarding records
- CPOMS records and chronologies
- attendance and absence data
- behaviour and bullying records
- child-on-child abuse records
- low-level concerns records
- allegations records
- online safety and filtering and monitoring reviews
- boarding safeguarding records
- EYFS safeguarding arrangements
- pupil voice
- parent and staff feedback
- training records
- recruitment and Single Central Record checks
- case reviews and lessons learned
- reports to Directors

The DSL, Head of School, safeguarding governor and Directors will use this information to identify patterns, themes, emerging risks, training needs, procedural weaknesses and areas for improvement.

This policy will be reviewed annually, or sooner following a significant safeguarding concern, change in law, statutory guidance, local safeguarding procedures, inspection findings or change in school provision.