Drakelow Park Flying High Academy

Child Protection and Safeguarding Policy

September 2026-2027

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

Policy review dates and changes

Review date	By whom	Summary of changes made	Date ratified by governors/trustees	Date implemented

Content list

Section		Page number
1.	Introduction	
2.	What is abuse?	
3.	School staff safeguarding roles and responsibilities	
4.	Key safeguarding contacts	
5.	Ensuring a safe environment for all children	
6.	Responding to concerns about a child's welfare	
7.	Child-on-child abuse, including sexual violence and harassment	
8.	Safer recruitment and selection of staff	
9.	What staff should do if they have a safeguarding concern or an allegation about another member of staff or concerns about safeguarding practices within the school	
Appendices		
1.	Example concerns form	
2.	Safeguarding flowchart	
3.	The seven golden rules to sharing information	
4.	Safeguarding and child protection recording	

Section 1: Introduction

This child protection/safeguarding policy outlines how the school will safeguard and promote children's welfare to keep our learners safe from abuse, neglect, and exploitation.

The policy applies to all adults, including volunteers, governors/trustees, supply staff and contractors working in or on behalf of the setting.

As defined in Working Together to Safeguard Children (2026) safeguarding and promoting the welfare of children as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Promoting the upbringing of children with their birth parents, or otherwise their family network[1] through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to achieve the best outcomes in line with the outcomes set out in the Children's Social Care National Framework[2]

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

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Children means everyone under the age of 18.

We help to keep children safe by:

- Providing safe environments, with secure access, where children can learn and develop

[1] A family network can be a blood-relative, or a non-related connected person, such as a family friend or neighbour
[2] Children's social care: national framework. The statutory national framework document is for those who work in local authority children's social care. It includes relevant information for all safeguarding partners and agencies who work with children's social care.

- Acting in the best interests of children to protect them online and offline, including when they are receiving remote education
- Providing a robust preventative education programme through a whole school approach
- At the earliest opportunity, identifying children who may need extra or community-based support, early help (this will be known as Family Help), intensive services and specialist services i.e., a child who is suffering or likely to suffer significant harm. This can include, but is not limited to, neglect, abuse (including by other children), grooming or exploitation
- Taking timely and appropriate safeguarding action for children who need extra help or who may be suffering, or likely to suffer, harm. This includes, if required, referring in a timely way to those who have the expertise to help
- Using safe recruitment processes
- Managing allegations that may meet the harm threshold and allegations/concerns that do not meet the harm threshold, referred to as low-level concerns

We will ensure that parents/carers and our partner agencies are aware of our child protection/ safeguarding policy by ensuring that it is on the school website.
1. Our Designated Safeguarding Leaders photos, names and roles in school will be displayed on entry to the school and on the main gates to highlight this to parents and visitors alike. Also included on the entry images are contact numbers for Childline as reference for parents, visitors and members of our community.
2. On entry to school, visitors are asked for proof of ID and asked to read our Safeguarding for Visitors Code of Conduct and will be asked to sign to say that they have read and understood this. Visitors will be donated by the red lanyard. Children learn that this means the person wearing the red lanyard is a visitor and not a trusted school adult.
3. Safeguarding displays around school that are referred to during safeguarding specific teaching and weekly assemblies.
4. Child friendly versions of our safeguarding posters will be displayed in all areas where children frequent e.g. School hall, classrooms, toilets (image 2).
5. Half termly safeguarding newsletters for parents will be created to ensure awareness of national changes, up to date issues regarding online safety and any school updates that may be relevant to them.
6. Safeguarding learning is woven through our RSHE and PSHE curriculum and children are explicitly taught ways in which they can safeguard themselves and others.
7. The school website will also have information about how parents/children/other agencies can contact the designated safeguarding lead and their deputy/ies and include their availability during out of school hours and school holidays.
8. In any welcome meetings with new parents/carers we share how we keep our children safe and how parents can support this.

The school website also has information about how parents/children/other agencies can contact the designated safeguarding lead and their deputy/ies and include their availability during out of school hours and school holidays on our safeguarding page.

Safeguarding and child protection policy statement
Drakelow Park operates a whole school approach and ethos to safeguarding and protecting children. Where safeguarding is concerned, we maintain an attitude of *"it could happen here"*. We recognise that everyone in the school has a role to play to keep children safe; this includes ensuring children feel heard and understood, identifying concerns, sharing information, and taking prompt action. Safeguarding and child protection is incorporated in all relevant aspects of

processes and policy development. All systems, processes and policies operate with the best interests of a child at their centre.

We ensure that all children are safeguarded while on or off school premises and are proactive about anticipating and managing risks that children face in the wider community and online. To support this the school assesses the risks and issues in the wider community when considering the well-being and safety of its learners.

We recognise that children's safeguarding needs can be influenced by their lived experiences and the wider community in which they grow up. Within our local context, some children may be more vulnerable to harm, including domestic abuse, exposure to violent or criminal behaviour, anti-social behaviour and online risks. The school therefore takes a child-centred and contextual safeguarding approach, working in partnership with local agencies to identify concerns early and reduce risk. We are part of Stopping Domestic Abuse Together (SDAT) (Derby and Derbyshire's local version of Operation Encompass) to ensure timely information sharing and appropriate support for children affected by domestic abuse. Safeguarding is embedded through strong relationships, a robust PSHE and RSHE curriculum and clear teaching that helps children develop the skills to recognise unsafe situations, manage emotions, and resolve relational conflict safely and respectfully. Our children are taught about the Fundamental British Values and how we treat others with the respect that they deserve so that we are all able to live peacefully and side by side. Children are taught how to keep themselves safe in a situation where they may feel unsafe and to always talk to a trusted adult about something that makes them feel unhappy or uncomfortable. Children are taught about their trusted adults in school and how they keep them safe on a daily basis and children are similarly taught about adults within the community who's job it is to keep us safe eg. Police, Fire, Doctors and Nurses. Children are taught about trusted adults, personal safety and online safety, including the consistent use of the message "STOP, DROP and TELL." Staff maintain a high level of vigilance and always act in the best interests of the child to ensure all pupils feel safe, supported and listened to.

To protect our learners, we have a Prevent action plan/risk assessment and are part of Operation Encompass (previously known locally as Stopping Domestic Abuse Together/ SDAT). We have a robust taught safeguarding curriculum taught through JIGSAW and reinforced through regular weekly assemblies. Our RSHE curriculum, maps out where this is taught. Online safety is taught as part of the curriculum using National Online Safety Materials eg CEOP.

The school recognises we have an important role to play in multi-agency safeguarding arrangements and contributes to multi-agency working as set out in Working Together to Safeguard Children (2026). As a relevant agency, the school understands its role within local safeguarding arrangements and operates in accordance with the Derby and Derbyshire Safeguarding Children multi-agency procedures, including the local criteria for action (known as the Threshold document) and the Derby and Derbyshire local protocol for assessment and support.

To support key multi-agency safeguarding communications, we have a dedicated secure safeguarding email address safeguarding@drakelowparkfha.co.uk which is accessible by at least two members of our safeguarding staff. During the school term and in school hours, this is checked daily. An 'out of office' message is operational during other times and in school holidays to advise partner agencies if and how often messages will be checked/responded to and when the

school will reopen. This out of office message also gives advice on what to do if you have an immediate safeguarding concern about a child. Our Safeguarding email address is checked once every 48 hours during school holidays by a member of our DSL Team.

The school is also aware of and implements any local learning where appropriate, such as those as outlined in DDSCP Briefing Notes relating to learning from reviews or audit located in the multi-agency safeguarding children procedures document library. The school works closely with a wide range of partner agencies to safeguard and promote the welfare of children, particularly those who may be vulnerable or in need of additional support. This includes regular liaison and information sharing with health professionals, including School Nursing Services, Child and Adolescent Mental Health Services (CAMHS), emotional wellbeing and mental health support teams, speech and language services, and substance misuse services where appropriate. We also work collaboratively with voluntary and community organisations, faith groups, Derbyshire Children's Services, Best Start Family Hubs, Early Help services, Family Help teams and Social Care.

The school actively participates in multi-agency meetings, including Early Help Assessments, Team Around the Family (TAF) meetings, Child in Need meetings, Child Protection Conferences, Core Group meetings and other professional forums to ensure coordinated support for children and families. Where appropriate, the school hosts and facilitates meetings on site to support effective partnership working and to ensure children and families can access services in a familiar environment.

As part of Flying High Partnership, the school engages fully with Trust safeguarding arrangements and works effectively with the Flying High Partnership Safeguarding Team. This includes attendance at regular Strategic Heads meetings and safeguarding network events, engagement with Trust communications and safeguarding updates, accessing resources and guidance through the designated Family Help Team (FHT) Teams space, participating in safeguarding audits and quality assurance activities, and seeking support, challenge and advice from the Trust Safeguarding Team to continually strengthen safeguarding practice across the school.

Context

This policy enables Drakelow Park Flying High Academy to carry out our functions to safeguard and promote the welfare of children and must be read alongside key guidance:

- Department for Education's statutory guidance publications for schools and local authorities, including:
  - Working Together to Safeguard Children (2026)
  - Keeping Children Safe in Education (2026)
  - Designated teacher for looked-after and previously looked-after children (2018)
- Human Rights Act (1998) and Equality Act (2010), including the Public Sector Equality Duty
- Data Protection Act (2018), UK GDPR and Data (Use and Access) Act (2025) – known as 'data protection laws'
- Prevent Duty Guidance (2023) and The Prevent duty: safeguarding learners vulnerable to radicalisation (2023)
- Relationships and sex education (RSE) and health education
- Derby and Derbyshire Multi-agency Safeguarding Children procedures

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

- Children's health and safety and well-being, including their mental health
- Behaviour policy, including how we engage learners struggling to engage in school, mental health and behaviour, acceptable and non-acceptable behaviours, how we prevent and respond to bullying including cyber bullying, prejudiced based and discriminatory bullying and child-on-child abuse. This policy also outlines the school's screening, searching, and confiscating powers and how they will be used safely, proportionately, and appropriately, including police strip searches
- Staff, learner, and visitor acceptable use policy/agreements, as part of the school cyber awareness plan
- Use of restrictive intervention, including use of
- reasonable force and the increased vulnerability of children with special education needs and/or disabilities (SEND) and equality duties
- School attendance, including unexplainable and/or persistent absences from education, not in receipt of fulltime education or go missing from education, home, or care
- Suspension and permanent exclusion
- Meeting the needs of learners with medical conditions
- Support children in school with allergies
- Providing first aid
- Educational visits
- Intimate care
- Emotional well-being
- Online safety, including use of mobile and smart technology, AI, online safety at school and at home and other associated issues, including making or sharing nudes and semi-nudes, , appropriate filtering and monitoring, and how children can be kept safe from terrorist and extremist materials
- School mobile phone free policy – note this can be standalone or incorporated into the behaviour policy
- Safer recruitment and selection, including single central record
- Staff behaviour (code of conduct), including low level concerns, managing allegations against staff, including supply staff, contractors and volunteers incorporating 'duty to refer' and whistleblowing, acceptable use of smart technologies/mobile devices, staff/learner relationships and communications, including the use of social media
- School security and visitors
- Policy/agreement for visiting speakers
- SEND annual information report
- Relationships education (RE)/relationships and sex education (RSE) and health education (physical and mental well-being)
- Communications
- Complaints procedure
- Data protection policies and privacy notices, including record keeping and retention
- Information sharing

Section 2: What is abuse?

Abuse is a form of maltreatment of a child which may be caused by an adult, adults or by another child or children inflicting harm or by failing to prevent harm. The harm can involve physical, sexual, or emotional abuse, neglect and/or exploitation and can include witnessing the ill treatment of others, such as in all forms domestic abuse. Children can be at risk of abuse inside and outside of their home, in their community, inside and outside the school and online.

Safeguarding issues can put children at of risk harm. Behaviours linked to drug taking and/or alcohol misuse, unexplained and/or persistent absences or going missing from education, serious violence (including county lines), radicalisation, consensual/non-consensual sharing of nude and semi-nude images can be signs that children are at risk. Abuse, neglect, exploitation, and safeguarding issues are rarely stand-alone events; in most cases multiple issues will overlap with one another.

Safeguarding action may be needed to protect children from the following risks, which include abuse perpetrated by other children as well as by adults:

- Any concerns that a child has suffered or is at risk of suffering physical abuse, sexual abuse, emotional abuse, or neglect
- Bullying, including online bullying and prejudice-based bullying, racist, disability and homophobic or transphobic abuse
- Gender-based violence/violence against women and girls
- Harmful sexual behaviour, sexual harassment, online sexual abuse, and sexual violence between children. Online abuse can include sending abusive, harassing, and misogynistic or misandrist messages; making or sharing nudes and semi-nudes; and coercing others to make and share nudes/semi-nudes
- Radicalisation and/or extremist behaviour
- Child sexual exploitation and child criminal exploitation, including financial exploitation and county lines
- Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example youth produced sexual imagery
- Abuse within intimate personal relationships between children (sometimes known as 'teenage relationship' abuse, including physical, sexual, emotional abuse, and stalking)
- Upskirting[3]
- Substance use – drugs and/or alcohol
- Gang activity and serious violence, particularly affecting young males who have been excluded, have experienced trauma and have been involved in offending
- Domestic abuse
- Forced marriage, marriage/civil partnership under the age of 18, virginity testing or hymenoplasty, female genital mutilation and 'honour or faith based' abuse
- Children with Perplexing Presentations (PP) in whom illness is fabricated or induced (FII)
- Homelessness
- Other issues not listed here but that pose a risk to children

[3] Upskirting is taking a picture of someone's genitals or buttocks under their clothing without them knowing, either for sexual gratification or in order to humiliate or distress the individual. This is a criminal offence, see Voyeurism (Offences) Act (2019)

Further information about indicators of abuse and neglect as well as safeguarding risks noted above are located in Keeping Children Safe in Education (2026).
Taken from KCSIE 2026:

Abuse, neglect and exploitation

Indicators of abuse and neglect

24.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

25.

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

26.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or
corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

27.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

28.
Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion
from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding issues

29.
All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below).
The following behaviours and indicators can be signs that children are at risk:
• drug taking and/or alcohol misuse
• unexplainable and/or persistent absences from education
• serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
• consensual and non-consensual making or sharing of nudes or semi-nudes. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal – whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing nudes and semi-nudes.

Child-on-child abuse (including harassment and violence)

30.
All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.
31.
All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse (whether these concerns are thought to have taken place on or off-site) they should speak to their designated safeguarding lead (or a deputy). As part of this, schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school).
32.
It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
33.
All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.
34.
As well as knowing how to respond to concerns, all staff should know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff

should know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

35.

Child-on-child abuse is most likely to include, but may not be limited to:

• bullying (including cyberbullying, prejudice-based and discriminatory bullying),

• abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse'),

• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),

• serious physical assault and harm, or the threat of harm with a weapon,

• sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence),

• sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse,

• causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,

• consensual and non-consensual making or sharing of nudes and semi-nudes,

• upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

• initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

36.

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

37.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines11, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

38.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. It is not possible

for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

39.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation (CSE)

40.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

41.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

42.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". Links to the Home Office's County Lines advice is provided within the serious

violence information on pages 172-173. The Independent Inquiry into Child Sexual Abuse: An organised network is characterised by two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Domestic abuse

43.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, and ability to learn.

Female genital mutilation (FGM)

44.

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the

profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. (See page 173 of KCSIE for further information.)

Mental health

45.

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

46.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is involved in the sexual exploitation of children includes introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child or allowing their property to be used for sexual activities with a child.

13 Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, “teacher” means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England). If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

• significant changes in behaviour,
• ongoing difficulty sleeping,
• withdrawing from social situations,
• not wanting to do things they usually like, and
• physical signs of self-harm or neglecting themselves.

47.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools and colleges should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education.

48.

If staff have a concern about a child’s mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy.

If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Serious violence

49.

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual pupil and others in

the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

50.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be

alert to when children might be at highest risk around the school day (for example, immediately after school). Further information on indicators, risk factors, and protective actions relating to serious violence is provided in Annex A of KCSIE.

51.

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support (practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the “what works” centre for preventing violence).

52.

Designated safeguarding leads can find further guidance on referrals and when to contact the police in Annex B (Manage Referrals).

Section 3: School staff safeguarding roles and responsibilities

Staff induction

Staff and governors at Drakelow Park Flying High Academy will have an induction appropriate to their roles, which will include organisation vision/ethos, aspirations, and expectations of all staff, as well as what is considered acceptable and what is not. New staff will also receive information about systems within the school which support safeguarding, including online safety and copies of policies; this includes:

- Child protection/ safeguarding policy, which includes how the school deals with child-on-child abuse
- School behaviour policy, which includes school measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Staff behaviour (code of conduct) policy, which includes acceptable use of technologies/mobile devices, online filtering and monitoring processes utilised and expectations associated with this, staff/learner relationship and communications, including the use of social media. The policy also incorporates low-level concerns, allegations against staff and whistleblowing
- Attendance policy and the safeguarding response to children where there are unexplainable and/or persistent absences or are missing from education
- The safeguarding response to child-on-child abuse
- The role and names of the designated safeguarding lead, their deputy/ies, the designated teacher for looked after children, the senior mental health lead, and the designated governor

New Headteacher and School Business Leads

- Receive an induction from the Flying High Safeguarding Lead outlining their specific roles and responsibilities connected to all aspects of Safeguarding. This includes information on FHP Policies/Procedures, Safeguarding Audit Process/Safeguarding Training Expectations/Use of Online Safety Audits/Use of CPOMS/Staff safe/Arbor / Maintaining a compliant Single Central Record/Access to Safeguarding resources/templates through Headteacher or School Business Teams

All staff will:

- Receive a paper/electronic copy of, read and sign to say that they have received, read, and understood:
    - Those who work directly with children at least Part one of Keeping Children Safe in Education: for school and college staff (2026)
    - School leaders, including governors/trustees/proprietors and designated safeguarding leads/deputies all of Keeping Children Safe in Education (2026)
    - Staff who do not work with children directly Keeping Children Safe in Education: for school and college staff (part 1) (2026)

All staff will:

- Be aware of:
    - Operation Encompass (previously known locally as Stopping Domestic Abuse Together /SDAT) a police-led early domestic abuse notification to schools, and the school dedicated safeguarding email address
    - The safeguarding response to children who are missing education or where there are unexplainable and/or persistent absences from education

- The safeguarding response to child-on-child abuse
- What private fostering arrangements are and the appropriate safeguarding response
- The early help process for universal and community-based support and family help for children with emerging/additional needs and understand their role in it
- The process for making a referral to local authority children's services and social care, the statutory assessments that may follow this and the role they may play in such assessments
- The protocols for recording concerns on school systems

- Know what to do if a child tells them they are being abused, exploited, or neglected and will be able to reassure children they are being taken seriously, will be supported, and kept safe
- Know what to do if a child shares, produces, or receives a sexual communication, including making or sharing nudes/ semi-nudes
- Know what to do if a parent or carer shares any concerns about a child
- Be aware:
    - Children may not feel ready or know how to tell and/or might not recognise their experiences as harmful and that certain children may face additional barriers to telling
    - Any child may benefit from early help and be alert to the need for early/family help for some groups of children
    - Of the indicators of abuse, exploitation, and neglect, understand that children can be at risk inside and outside of the school, in their home, institutional or community setting and online
    - Children can abuse other children, referred to as child-on-child abuse, and the school policy to prevent and respond to it
    - Children with special education needs, disabilities (SEND) or health issues, particularly those with neurodevelopmental conditions such as autism, as well as those with certain medical or physical health conditions are particularly vulnerable to online and offline abuse, exploitation, and neglect - and also face additional barriers to the recognition of this abuse
    - In addition to children with SEND or health issues, that some groups of children are potentially at greater risk of harm, including children who need a social worker, children absent or missing from education or who are electively home educated, children requiring mental health support, looked after/previously looked after children and children who are, or may be, lesbian, gay, bisexual, or gender questioning
    - Technology is a significant component in many safeguarding and well-being issues
    - Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
    - That children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse
    - Of the '*one chance'* rule with suspected or actual victims of forced marriage and honour or faith-based abuse. That is, they may only have one opportunity to speak to a victim or potential victim to offer appropriate support and advice
    - Of the possible indicators, alongside other factors, and contexts, that a child is likely to be susceptible to an extremist ideology
    - Of the indicators which may signal children are at risk from, or involved with, serious violent crime

- Have the skills, knowledge and understanding to keep looked after children and previously looked after children safe
- Discuss/report any concerns they have about a child with the designated safeguarding lead or their deputy. If staff members are unsure, they should always speak to the designated safeguarding lead or their deputy
- Speak to the designated safeguarding lead or deputy about any concerns about honour or faith-based abuse, breast ironing, female genital mutilation (FGM)[4], virginity testing and hymenoplasty[5]
- Work with the designated safeguarding lead and do everything they can to support social care workers to help them carry out a statutory assessment
- Be mindful that early information sharing is vital to identifying and tackling all forms of abuse, exploitation, and neglect and in promoting children's welfare, including in relation to their educational outcomes

Governors/trustees/proprietors and the management of school safeguarding
As outlined in Keeping Children Safe in Education (2026) the governing body/trustees/ proprietors have a strategic leadership responsibility for the school safeguarding arrangements and has/have the responsibility to ensure that the school complies with safeguarding duties under legislation. There is a senior board level member who takes leadership responsibility for the establishment's safeguarding arrangements.

The governing body and their senior leadership teams and designated safeguarding lead are aware of and follow local arrangements. This includes understanding and applying the Threshold document (criteria for action), Derby and Derbyshire Local Protocol for Assessment and Support, Derby and Derbyshire Child Protection Conference Professional Dissent process and Dispute Resolution and Escalation protocol. Arrangements have been made to set out information sharing processes and principles within the school and with local authority children's social care, safeguarding partners (Derby and Derbyshire Safeguarding Children Partnership/DDSCP) and other agencies. The school will supply information as requested by the DDSCP which enables and assists partners to perform their functions to safeguard and promote the welfare of children in their area, including information related to local and national child safeguarding practice reviews.

Governors exercise strategic oversight of all aspects of safeguarding in the school and this is a standing item at all governing body meetings and recorded in minutes. To support this on an annual basis:

- A safeguarding audit is undertaken to ensure the effectiveness of safeguarding policies and processes.
- A review and risk assessment of the school approach to online safety, policy and practice using the *360 Degrees Safe Online Safety Self-Review Tool for Schools)*

Headteacher/principal
The school headteacher will ensure that the policies and procedures, adopted by their governing body and proprietors, are understood, and followed by all staff. This includes working with the designated safeguarding lead, their deputy, and other senior leaders, to ensure the effectiveness of safeguarding within the school and ensuring that educational outcomes of children who have or have had a social worker are promoted.

[4] There is a specific legal duty on teachers to report acts of FGM on girls under 18 to the police
[5] It is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK; see multi-agency guidance for more information

Designated safeguarding lead and deputy designated safeguarding lead
A member of the senior leadership team is appointed to the role of designated safeguarding lead. They take a lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

The designated safeguarding lead co-ordinates the setting's safeguarding and child protection arrangements. They provide advice and support to other staff on child welfare, safeguarding and child protection matters, including Operation Encompass notifications, take part in strategy discussions/meetings and inter-agency meetings – and/or supports other staff to do so - and contributes to the assessment of children.

The establishment also has a deputy designated safeguarding lead to cover for when the designated safeguarding lead is not available; the lead responsibility however remains with the designated safeguarding lead. Robust cover arrangements are in place to ensure continuity of safeguarding leadership during periods of absence, including illness, annual leave, training and other circumstances. Deputy DSLs are appropriately trained and have access to safeguarding records and systems to enable them to undertake the role effectively. The school ensures that at least one appropriately trained DSL or Deputy DSL is available during school hours and during any extended school activities. In the event of the absence of both the DSL and Deputy DSLs, support and advice can be sought from the Headteacher and the Trust Safeguarding Team to ensure that safeguarding concerns continue to be responded to promptly and effectively. Staff are informed of current safeguarding leads and arrangements through regular communication and safeguarding updates.

The designated safeguarding lead actively liaises with other school staff with safeguarding responsibilities, teachers, pastoral support staff, school nurses, IT leads, SENCos and senior mental health leads on matters of safety and safeguarding to ensure safeguarding and promoting children's well-being are effective.

The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) are always available during school hours for staff to discuss safeguarding concerns. In this setting, available means that a member of the safeguarding team is on site and contactable in person or, where this is not possible, immediately contactable by telephone or email and able to respond without delay. The school has a safeguarding team consisting of the DSL and two trained Deputy DSLs, ensuring that staff have access to safeguarding advice and support throughout the school day.
Robust arrangements are in place to ensure safeguarding leadership is available during exceptional circumstances, including staff absence, educational visits, remote working arrangements or emergency school closures. Where the DSL is unavailable, a Deputy DSL will assume responsibility for responding to concerns and liaising with external agencies as required. In the unlikely event that neither the DSL nor a Deputy DSL is available, staff should seek immediate support from the Headteacher and, where necessary, contact Children's Social Care, the Police or the Trust Safeguarding Team directly.
Appropriate safeguarding arrangements are also in place for out-of-hours and out-of-term activities, including educational visits, extended services and holiday provision. A suitably trained DSL or Deputy DSL will be available and contactable for the duration of these activities to ensure that any safeguarding concerns can be managed effectively and without delay. Staff are regularly

informed of the current safeguarding team and contact details through induction, safeguarding training, staff briefings and internal communications.

More information about the role and responsibilities of the designated safeguarding lead can be found in Keeping Children Safe in Education (2026) Annex B: Role of the designated safeguarding lead.

Safeguarding training

All staff and governors are equipped with the knowledge and skills to keep children safe. In addition to the safeguarding training at induction, all staff and governors will receive safeguarding training appropriate to their roles and responsibilities which is regularly updated[6]. They also receive training on the Prevent Duty, child-on-child abuse, private fostering and online safety training (which includes effective responses to sharing nudes/semi-nudes, including those generated by AI and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). All staff and governors will also receive regular safeguarding and child protection (including online safety) updates at least annually. This will help provide them with an awareness of safeguarding issues that can put children at the risk of harm ensuring they have the relevant skills and knowledge to safeguard children effectively.

The school is committed to ensuring that safeguarding knowledge and practice remain current. Weekly safeguarding updates are shared with staff through Andrew Hall's safeguarding briefings and the *39 Weeks of Safeguarding* resources. These updates provide timely information on emerging safeguarding themes, local and national developments, changes in legislation and guidance, and lessons learned from reviews, helping staff to maintain an up-to-date understanding of safeguarding responsibilities.

All staff within Flying High Partnership have access to safeguarding training through The National College. The training programme covers a broad range of safeguarding topics and is regularly updated to reflect changes in statutory guidance and national policy. Staff are responsible for completing the required training and submitting evidence of completion to the member of staff responsible for maintaining the school's training records.

The Flying High Partnership Training Matrix sets out the mandatory safeguarding training requirements for all staff groups, including the frequency with which training must be completed. School leaders regularly monitor training compliance to ensure all staff maintain the knowledge and skills necessary to fulfil their safeguarding responsibilities effectively.

All staff will receive training on:

- Attendance, with dedicated attendance training for any staff with a specified attendance function in their role, including administrative, pastoral, or family support staff, and senior leaders.
- Data protection (including recording protocols) and cyber security, with in-depth data protection training for DSLs in line with Keeping Children Safe in Education, Annex B: Role of the designated safeguarding lead.

The governors' safeguarding training and updates will enable them to have the knowledge to provide strategic challenge to test and assure themselves that safeguarding processes and procedures are effective and robust. They will ensure that a whole school approach to

[6] See DDSCP multi-agency training pathway on the training page of www.ddscp.org.uk

safeguarding is in place. Much of this can be completed/evidenced on National College and listed on the Governor's profile on Governor Hub

Those involved with the recruitment and employment of staff to work with children will have received appropriate safer recruitment training.

Section 4: Key safeguarding contacts

School staff with specific safeguarding responsibilities *(Add or amend list as appropriate. Please note personal phone numbers and email addresses should not be used)*

Safeguarding Role	Name and Role	School contact details
Designated Safeguarding Lead	Stephanie Beardmore Headteacher and DSL	head@drakelowparkfha.co.uk
Senior Leader(s) available for contact in the absence of the designated safeguarding lead	Beth Teale EYFS Lead	bteale@drakelowparkfha.co.uk
Deputy Designated Safeguarding Lead	Natasha Wilkes School Business Lead	nwilkes@draelowparkfha.co.uk
Other staff with safeguarding responsibilities	All staff have responsibility to safeguard our children	
Attendance Lead	Natasha Wilkes	nwilkes@draelowparkfha.co.uk
SENCo	Penny Poole	ppoole@drakelowparkfha.co.uk
Designated Safeguarding Governor/ Trustee	Louisa Wright	lwright@drakelowparkfha.co.uk
Designated Teacher for Looked After/ previously Looked After Children	Stephanie Beardmore	head@drakelowparkfha.co.uk
Senior Lead/s for Mental Health and Well-being	Stephanie Beardmore	head@drakelowparkfha.co.uk
Governor/Trustee for Mental Health and Well-being	Louisa Wright	lwright@drakelowparkfha.co.uk
PHSE/RSE Lead	Stephanie Beardmore	head@drakelowparkfha.co.uk
SLT Digital Lead	Stephanie Beardmore	head@drakelowparkfha.co.uk
FHP Safeguarding Lead (Schools)	Kim Tucker	01623460664
FHP Inclusion Lead (Schools)	Grant Worthington	0115 9891915
FHP Whistleblowing Officer	Paul Goodman	0115 9891915
FHP Trustee for Safeguarding	Paul Goodman	0115 9891915

Other Key Local Safeguarding Contacts

	Derby	Derbyshire
Early/Family Help and Advice	• Derby City Family Hubs and Early Help • Early Help Advisors, see Safeguarding Children Procedures Contacts, advice and further information	• Family Help Service • For advice contact Starting Point Consultation and Advice Service for Professionals via 01629 535353

	Derby	Derbyshire
Targeted Early/Family Help requests	Locality Vulnerable Children Meeting (VCM)/ Family Help Forums (FHF) for requests for targeted early help via multi-agency team (MAT) or non-urgent social care referrals via Locality Casework Support Officers	Requests for support from professionals should be made via the online request for support unless a child is at risk of Significant Harm
Speak to a Social Worker for thresholds advice and consultation	Children's Services Professional Consultation Line 07812 300329	Starting Point Consultation and Advice Service for Professionals 01629 535353
Referrals to Local Authority Children's Social Care	***Initial Response Team*** **Urgent:** 01332 641172 or out of hours via Careline 01332 956606 **Non urgent:** Derby Children's Social Care Online Referral system	***Starting Point*** **Urgent:** Call Derbyshire 01629 533 190 **Non urgent:** Starting Point online
Local Authority Designated Officer (LADO)	Derby LADO advice form Derby and Derbyshire LADO referral form **Email:** CPMduty@derby.gov.uk	Derby and Derbyshire LADO referral form **Email:** professional.allegations@derbyshire.gov.uk
Derbyshire Police	• 999 for emergencies or 101 for non-emergencies • Mandatory reporting of Female Genital Mutilation (FGM) via 101 • School Police Safer neighbourhood team or link officer Andrea Thompsonandrea.thompson@derbyshire.police.uk • Also see *When to call the police – guidance for schools and colleges*	
Prevent (radicalisation and extremism)	• For advice contact the Local Authority Prevent Team: Derbyshire - 01629 535646 or prevent@derbyshire.gov.uk Derby - Prevent@derby.gov.uk • Police Prevent (radicalisation/extremism) Team on 101 or directly via 0300 1228694. For emergencies phone 999. See Refer someone to the Derbyshire Prevent Team (Derbyshire Constabulary) • Reporting extremism concerns about an adult working in an education setting submit the details at report extremism in education	
Children absent from education	• Derby Education Welfare Service (EWS) • Elective home education (EHE) • Children missing education (CME)	• Derbyshire Education Welfare Services • Elective home education (EHE) • Children missing education (CME) • See Children missing from education for further information on guidance, policies and procedures relating to school age children missing from education

	Derby	Derbyshire
Virtual School for Looked After Children	• Virtual School Head - 07812 301044 or graeme.ferguson@derby.gov.uk • Specialist Education Support Officer for LAC	Helen Moxon, Virtual School Headteacher 01629 538028 virtualschool@derbyshire.gov.uk • Specialist Education Support Officer for LAC or other role
Public Health Nurse/other health contact/s	• *Contact the UK HAS for East midlands on 03442554524*	• *Contact the UK HAS for East midlands on 03442554524* Derbyshire Family Health Service 01246 515100 School Nurse Contact Form
Emotional Health and Well-being Services	https://derbyandderbyshireemotionalhealthandwellbeing.uk/professionals https://derbyandderbyshireemotionalhealthandwellbeing.uk/adult/emotional-wellbeing-support https://derbyandderbyshireemotionalhealthandwellbeing.uk/child-young-person https://derbyandderbyshireemotionalhealthandwellbeing.uk/neurodiversity	
Domestic Abuse	• Safer Derby City • Derbyshire constabulary - information and advice about domestic abuse webpages	• Safer Derbyshire domestic abuse webpage • Derbyshire constabulary - information and advice about domestic abuse webpages
Cyberchoices	For children at risk of being drawn into cybercrime via East Midlands Cyber Secure	
Homelessness or at risk of homelessness	Derby city council homelessness webpages	
Flying High Safeguarding Lead	Kim Tucker head@greenwoodprimary.org.uk	*01623460664 (School number)*
Flying High Deputy Safeguarding Lead	Jodie Owen Jodie.owen@bluebellhill.org.uk	
Flying High Inclusion Lead	Grant Worthington gworthington@flyinghightrust.co.uk	0115 9891915
FHP Whistleblowing Officer	Paul Goodman pgoodman@flyinghightrust.co.uk	*01159891915*
FHP Trustee for Safeguarding	Paul Goodman pgoodman@flyinghightrust.co.uk	*01159891915*

	Derby	Derbyshire

Key National Contacts

Organisation	Description and contact details
NSPCC helpline for adults	Helping adults protect children 24 hours a day. For help and support, including anyone needing advice about female genital mutilation, young people affected by gangs, concerns that someone may be a victim of modern slavery contact the NSPCC trained helpline counsellors on: • Text 88858 • 0808 800 5000 • help@nspcc.org.uk
NSPCC helpline Report Abuse in Education	Bespoke helpline for children and young people who've experienced abuse at school, and for worried adults and professionals who need support and guidance including for non-recent abuse: • 0800 136 663 • help@nspcc.org.uk
NSPCC Whistleblowing Advice	Free advice and support for professionals concerned about how child protection issues are being handled in their organisation: • 0800 028 0285 • help@nspcc.org.uk
UK Safer Internet Centre professional advice line	Helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care: • helpline@saferinternet.org.uk
Police Anti-Terrorist Hot Line number	0800 789 321
National Domestic Abuse Helpline	Hosted by Refuge, Helpline 0808 2000247
Operation Encompass	Information, resources and elearning for schools
Report harmful online content	• UK Safer Internet Centre – report online harm. A national reporting centre that has been designed to assist anyone in reporting harmful content online • CEOP – to report online sexual abuse or the way someone has been communicating online • Report online material promoting terrorism or extremism
Report Abuse in Education helpline	• Young people who have experienced abuse at school and parents and teachers who are concerned about sexual abuse in education settings can call the Report Abuse in Education helpline on 0800 136 663 or email help@nspcc.org.uk
Harmful Sexual Behaviour Support Services	• SWGfL Harmful Sexual Behaviour Support Service/Marie Collins Foundation guidance, resources, and online video training package.

Organisation	Description and contact details
	• Stop it now! For worries about a child's sexual behaviour, 0808 1000 900. Includes Shore which provides a safe and anonymous place for young people to get help and support. The aim is to prevent harmful sexual behaviours among young people.

Section 5: Ensuring a safe environment for all children

Our school provides a safe environment where children can learn and develop. This is an essential part of our whole school approach to safeguarding which incorporates a culture of vigilance where children's welfare is promoted, timely and appropriate safeguarding action is taken for children who need extra help or who may be suffering, or likely to suffer harm.

The school environment is safe and secure and protects our learners from harm or the risk of harm. Positive behaviours are consistently promoted, and abusive or inappropriate behaviour challenged. A positive and supportive environment is promoted which gives learners a sense of being valued.

The school complies with obligations under the Equality Act and relevant school premises regulations. We carefully consider how we support children with regard to protected characteristics and, where needed, make reasonable adjustments for disabled children.

The school follows regulations and safeguarding requirements relating to school premises and sport. The school is committed to ensuring that all children can access PE, sport and physical activities safely, inclusively and with dignity. Arrangements for toilets, changing facilities and showers are designed to safeguard children's privacy, welfare and wellbeing while meeting statutory requirements. The school provides appropriate supervision and risk assessments for PE and sporting activities and ensures that participation is safe, fair and suitable for all pupils.
Wherever possible, the school adopts a flexible and child-centred approach to PE kit, changing arrangements and participation in sporting activities, avoiding unnecessary rules based on gender stereotypes. Children are encouraged to participate fully in the curriculum and reasonable adjustments will be considered where individual needs have been identified.
The privacy, dignity and wellbeing of all pupils are paramount when using changing rooms and shower facilities. Appropriate measures are in place to provide privacy for all children, and any individual needs or concerns will be considered on a case-by-case basis. The school will work closely with parents/carers and relevant professionals where appropriate to identify suitable arrangements that support a child's welfare while maintaining the safety, privacy and rights of all pupils.
The school recognises that some children may be questioning their gender identity and will respond sensitively and appropriately to requests for support. Any decisions relating to a child's individual circumstances will be considered carefully, in partnership with parents/carers where appropriate, taking account of safeguarding responsibilities, the child's wellbeing, relevant legislation, statutory guidance and the needs of other pupils. The school does not operate a blanket approach and will consider each case individually.
Further guidance can be found within the school's Equality Policy, Behaviour Policy, Anti-Bullying Policy, Relationships and Health Education Policy, and any other relevant policies and procedures relating to inclusion, safeguarding and pupil welfare.

Vulnerable children
We recognise that some groups of children are potentially at greater risk of harm (both online and offline) than others and have agreed arrangements to ensure the safety of these children:

- **Children who need a social worker (Child in Need and Child Protection Plans**). As a matter of routine, the designated safeguarding lead will hold and use the information that the

child has a social worker to ensure that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. In addition, the school will work with the virtual head as appropriate, regarding the educational attendance, attainment, and progress of children with a social worker.

- **Children who are absent from education.** The school proactively manages and take steps to improve attendance across our community. Attendance is the essential foundation to positive outcomes for all our learners and is everyone's responsibility in school.

  The school response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, supports identifying a range of safeguarding issues, abuse, neglect and sexual or criminal exploitation, including county lines; it also helps prevent the risk of absent children becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker, where being absent from education may increase known safeguarding risks within the family or in the community. We support and monitor attendance and absence carefully to identify learners or cohorts that require support with their attendance and put effective strategies in place. This includes:
    - Building strong relationships with families, listening to, and understanding barriers to attendance and working with families to remove them.
    - Sharing information and work collaboratively with other schools in the area, the local authority, and other partners when absence is at risk of becoming persistent or severe.
    - Tiered approach to attendance – robust attendance policy and procedures
    - Strategic Team around attendance led by Headteacher (Includes Office Manager/Attendance Officer and DDSL)

  The school also recognises that when children are not in school, such as when a learner is on a reduced timetable, suspended or excluded, they miss the protection and opportunities that education can provide, and can become more vulnerable to harm, exploitation and being involved in serious violence. Learners who have a social worker, including looked-after children, and previously looked-after children, are especially vulnerable. The school proactively supports learners in the school environment and decision-making processes about reduced timetables, suspension or exclusion and operate in the best interest of children as outlined in local and national guidance. The school is committed to promoting positive behaviour, inclusion, attendance and engagement for all learners. Through a nurturing, relational and trauma-informed approach, we seek to identify and address barriers to learning at the earliest opportunity. We recognise that behaviour can be a form of communication and work closely with children, families and external agencies to understand and respond to individual needs, including those relating to safeguarding, special educational needs and disabilities (SEND), social, emotional and mental health needs, attendance, medical conditions and family circumstances.
  The school uses a range of early intervention and support strategies to help children remain successfully engaged in education. These may include pastoral support, reasonable adjustments, individual behaviour plans, risk assessments, Early Help intervention, multi-agency support, referrals to specialist services and partnership working with families. Where concerns arise, consideration is given to the views, wishes and feelings of the child and any known vulnerabilities, including whether the child has a social worker, is looked after, previously looked after or has an Education, Health and Care Plan (EHCP).

The school's aim is to create a safe, inclusive and supportive environment in which all children can thrive and achieve. As such, reduced timetables, suspensions and permanent exclusions are only considered when all appropriate support and intervention strategies have been explored and where such measures are lawful, proportionate and in the best interests of the child and the wider school community. Decisions are made on an individual basis and in accordance with statutory guidance, with particular regard given to safeguarding implications and the potential impact on the child's education, wellbeing and vulnerability.

Where a reduced timetable is considered necessary, this will be a time-limited measure implemented in partnership with parents/carers and, where appropriate, the child and relevant professionals. Reduced timetables will be formally agreed, regularly reviewed and monitored to ensure they remain appropriate and support a planned return to full-time education at the earliest opportunity. The school follows local authority guidance relating to part-time timetables and maintains clear records of decision-making and review arrangements.

Where suspension or exclusion is being considered, the school will take account of all relevant circumstances, including any safeguarding concerns, SEND, disability, mental health needs, adverse childhood experiences and the support already provided. The school works closely with families, local authority services, Family Help teams, social workers and other partner agencies to minimise disruption to education and secure appropriate support for learners. Throughout any period of suspension, exclusion or alternative provision, the school continues to consider its safeguarding responsibilities and maintains appropriate oversight of the child's welfare.

Further information can be found in the school's Behaviour Policy, SEND Policy, Attendance Policy, Inclusion Policy, Medical Conditions Policy and other relevant procedures.

- **Elective home education.** Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will seek to co-ordinate a meeting with the parents/carers, Local Authority, and other key professionals where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child and is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where a child has an Education, Health and Care Plan (EHCP) the local authority should review the plan with parents/carers. Where a child is taken off roll, we will inform the Local Authority of the deletion from our admission register via the system outlined on the Derby or Derbyshire elective home education webpages.

- **Children who require mental health support.** The school has an important role to play in supporting the well-being and mental health of our learners. Staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. Mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. We have clear systems and processes in place for identifying possible emotional well-being issues and mental health problems, seek advice from external agencies where appropriate and have clear referral and accountability systems. Drakelow Park have a strong pastoral team, our curriculum ensures that emotional well-being and mental health are delivered to promote resilience and support emotional well-being. We utilise Derby and Derbyshire

Mental Health Pathway Guidance, we have a Mental Health Lead, Mental Health First Aider and any other trained staff e.g. pastoral team.

- **Looked after children and previously looked after children.** The school ensures that appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead has:
    - Details of the child's social worker, and
    - The name and contact details of the virtual school head and the relevant support officer in the authority that looks after the child
    - The name of the Personal Advisor appointed to support a child who has left care

  When dealing with looked after children and previously looked after children, the school/ college will work with all local authority children's social care, health and other relevant agencies and take prompt action when necessary to safeguard these children, who are a particularly vulnerable group. The school has a named designated teacher, who has appropriate training, relevant qualifications, and experience. They work with the Virtual School, to promote the educational achievement of learners who are looked after, have left care through adoption, special guardianship, or child arrangement orders, or adopted from state care outside of England and Wales. In addition, the school recognises the distinct needs of children in kinship care and will, alongside the Virtual School, seek to will promote their education outcomes.

- **Young carers.** The school is alert to children who are young carers and recognise that this can impact on their attendance, behaviour and well-being.

- **Children with special educational needs and disabilities (SEND).** The school recognises that these children may face extra safeguarding challenges both online and offline. Additional barriers can also exist when recognising abuse, neglect, and exploitation. The designated safeguarding lead and SENCo/named person with oversight of SEND will closely liaise whenever there are any concerns or reports of abuse, neglect or exploitation involving a child with SEND, neurodevelopmental conditions such as autism or certain medical or physical health conditions. The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.) Drakelow Park have a Positive Relations Behaviour Policy, a Pastoral Team, and we deliver a range of prioritised pastoral interventions. At our school, we know if we get it right for our children with SEND, we get it right for all our children so we ensure SEND specific adaptations e.g. SEND Support Plans, De-Escalation Plans and Individual Risk Assessments.

- **Children with medical conditions.** The school is committed to ensuring that children with medical conditions are properly supported so that they can access education, participate fully in school life, feel safe and valued, and achieve their potential. We recognise that pupils with medical conditions, including long-term, complex and fluctuating conditions, may require additional support, flexibility and reasonable adjustments to enable them to attend school regularly and engage successfully in learning. We work closely with parents/carers, healthcare professionals and other agencies to ensure that appropriate arrangements are in place to meet individual medical needs. The school adopts a proactive and inclusive approach to supporting pupils with medical conditions through effective

communication, pastoral support, individual healthcare plans where required, risk assessments and staff training. Staff are made aware of relevant medical needs and understand their responsibilities in supporting pupils safely and appropriately. The school's Medical Conditions Policy sets out in detail how children with medical needs are supported and is reviewed regularly and made available to parents, carers and staff. The school recognises that allergies can present significant risks to children's health and wellbeing and takes all reasonable steps to create a safe environment for pupils with diagnosed allergies. Appropriate measures are implemented to minimise risks and ensure timely responses to allergic reactions. Individual healthcare plans are developed where necessary and shared with relevant staff. The school maintains procedures for the safe storage, accessibility and administration of Adrenaline Auto-Injectors (AAIs), including EpiPens, Jext and Emerade devices. Pupils' prescribed devices are stored in agreed and accessible locations, known to relevant staff, and are readily available in an emergency. Where appropriate, emergency spare AAIs may also be held in accordance with statutory guidance. Records are maintained of medication held within school, administration of medication and expiry dates to ensure devices remain in date and available for use. All staff receive regular training and updates in allergy awareness and anaphylaxis management, including recognising the signs and symptoms of an allergic reaction, responding appropriately to emergencies and the use of Adrenaline Auto-Injectors. Key staff receive enhanced training where required to meet the needs of individual pupils. The school regularly reviews procedures and training requirements to ensure staff remain confident and competent in supporting children with medical conditions and responding effectively in an emergency.

- **Children who are, or may be, lesbian, gay or bisexual.** The school will take steps to reduce the additional barriers these children face, address vulnerabilities such as the risk of bullying by taking steps to prevent it and create a culture where they can speak out or share their concerns with staff. At Drakelow Park our curriculum is responsive to the needs of our children and through the teaching of Fundamental British Values and the Protected Characteristics, our children have an excellent grounding in diverse cultures, inclusion and the celebration of similarity and difference.

- **Children who are questioning their gender.** When a child or parent/carer makes a request relating to social transition, the school will be aware of the potential vulnerabilities of a child who is questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. The school will consider each request on an individual basis, working with the child, parents/carers and, where appropriate, relevant professionals. The school's approach is child-centred, safeguards the wellbeing of all pupils and avoids unnecessary gender stereotyping. Further guidance can be found within the school's Equality, Anti-Bullying, Behaviour and Safeguarding policies.

- **Private fostering.** In addition to the above the school recognises the additional vulnerability of children in private fostering arrangements. A private fostering arrangement is essentially one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. When such arrangements come to our attention, we will notify the local authority to check the arrangement is suitable and safe for the child. Notifications will contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and made in writing. See statutory guidance Children Act 1989: private fostering.

We also recognise that in addition to the above, other factors can increase a child's vulnerability to abuse, exploitation, or neglect such as:

- In a family circumstance presenting challenges for the child, such as parental substance (drugs and/or alcohol) use, adult mental health issues and domestic abuse
- Misusing drugs and/or alcohol
- Being an asylum seeker/refugee
- Being from our new communities
- Living away from home, including private fostering arrangements, or have returned home to their family from care
- Are at risk of homelessness or living in temporary accommodation
- Living in chaotic, neglectful, and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of age, gender reassignment, marriage/civil partnership, pregnancy/maternity leave, disability, race (including colour, nationality, ethnic or national origin), religion/belief, gender, sex, or sexual orientation
- Being a young carer
- Not speaking or not having English as a first language
- Being involved in the court system
- Children affected by parental offending or with family members in prison

Our safeguarding curriculum is specifically designed to tackle issues like the above in an age appropriate way. We understand that our children come from diverse backgrounds and so our curriculum is responsive to the needs of our community and the children from within. Our curriculum is also adaptive to changes throughout the year and/or issues that may arise locally or nationally.

Teaching safeguarding

We are committed to offering our learners age and developmentally appropriate preventative education to ensure that learners are aware of personal safety, safeguarding risks, recognise when they are at risk and how and where to get help and support if they need it. They will be taught about safe use of technology, online harms, healthy relationships online and offline, how to keep themselves and others safe, including online and where to seek help. We recognise the new safeguarding risks caused by rapid technological developments and the need to support and educate children about these. To be effective, we employ best practice principles to ensure there is a safe and supportive environment and to facilitate participative and interactive education which aims to support and not to alarm pupils. We refer to the Effective Working Together Guidance: Supporting Schools to Deliver the PSHE Programme guidance to help to ensure that the input of external visitors to school enhances our PSHE programme.

The school is sensitive to our learners' circumstances and recognises teaching will need to be tailored to the specific needs and vulnerabilities of individual children, including those who have been victims of abuse, children with special educational needs and disabilities and other vulnerabilities.

Our preventative education forms part of our whole school approach to prepare our learners for life in modern Britain, encourages open debate about different points of view and beliefs and creates a culture of zero tolerance for sexism, racism, misogyny/ misandry, disablism, racism, homophobia, biphobia and sexual violence/harassment derogatory behaviour or other forms of

physical violence and conflict. It is responsive to contextual, local, and national data, issues, and trends to ensure it is meeting the challenges that children are facing.

The school's core values and standards, alongside the fundamental British Values, are upheld and demonstrated throughout all aspects of the school. This is underpinned by the school's behaviour policy, pastoral support system and our planned evidence-based relationships education/relationships and sex education and health education and reinforced throughout the whole curriculum.

See *Drakelow Park Flying High Academy* relationships education/relationships and sex education and health education policy and behaviour policy.

Online safety

Online safety and protecting learners from potentially harmful and inappropriate online material forms part of the whole school approach to safeguarding, including policies, curriculum, staff training, roles and responsibilities of the designated safeguarding lead and parental engagement. The school has filtering and monitoring systems in place, informed in part, by the risk assessment required by the Prevent Duty, which meet the current DfE filtering and monitoring standards. This includes:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems
- Reviewing filtering and monitoring provision at once every academic year
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning
- Having effective monitoring strategies in place that meet safeguarding needs

The school uses the DfE 'plan technology for your school service' to self-assess against filtering and monitoring standards and takes action on recommendations. In addition, we refer to Generative AI: product safety expectations guidance and Generative artificial intelligence (AI) in education to use AI safety. To address the risk of AI image manipulation, the school refers to considerations and best practice in the use of photos and videos across our online platforms as outlined in Protecting your setting's images from AI manipulation and abuse guidance.

The school safeguards children by protecting personal information and ensuring appropriate cyber security systems are in place in line with Cyber security standards for schools and colleges.

The school protects and educates learners and staff in their use of technology, including where they are learning remotely, and has mechanisms to identify, intervene and escalate any concerns where this is needed.

The school online safety policy outlines how the four areas of risk, content, contact, conduct and commerce, will be addressed to protect and educate learners and staff. It also incorporates the use of mobile and smart technology and appropriate filtering and monitoring on school devices and networks. Security protection procedures which meet the current Cyber security standards for schools and colleges are in place in order to safeguard the systems, staff and learners and review the effectiveness of these procedures to keep up with ever evolving cyber-crime technologies. The school is also in regular communication with parents and carers and uses these communications to reinforce online safety and the systems the school use to protect children from online harms.

To ensure that online safety is effective, especially as technology and the associated risks and harms evolve and change, the school undertakes an annual review of our approach to online safety, and an annual risk assessment to consider and reflect the risks children face.

For more information see school online safety and AI policies.

Systems for children to report concerns and abuse
Our school recognises the importance of ensuring that all children feel heard and understood. We have a culture of listening to children and taking account of their wishes and feelings in any measures the school may put in place to protect them. Whenever there are any concerns, the child's wishes will be taken into account when determining what action to take and what services are provided. The welfare and safety of a child is of paramount concern and staff will act in the best interests of the child.

We understand the difficulties that children may have in approaching staff about their circumstances and any concerns they may have. Some children may feel unable to report their concerns or abuse, others may have additional barriers to telling someone or may not recognise what is happening is abusive.

The school has an open and accepting attitude towards children and promotes a positive and supportive environment as part of our responsibility for pastoral care. Our school ethos promotes trusted relationships between learners and all staff which supports children to tell staff about any concerns they may have.

Children, parents/carers, and all staff will be free to talk about any concerns and see the school as a safe place. Many children can show signs or act in ways they hope adults will notice or react to, others may make indirect reports via a friend or staff may overhear conversations. All staff are alert to this and to the potential need for early/family help and are aware of the indicators of abuse, exploitation and neglect and know what actions they should take.

The school has systems in place for children to complain and/or confidently report their concerns, including any form of abuse or neglect, including child-on-child abuse, and know that their concerns will be treated seriously. Children know that all school staff are 'safe adults' and this is addressed weekly during our Monday morning assemblies. Children have reminders in their classroom and throughout the school environment to ensure they know which adults they can specifically talk to. Staff have regular reminders and updates about safeguarding reporting and how to do this with the most effectiveness. CPOMs is the system we use for reporting safeguarding concerns which are monitored and followed up by the DSLs.

Working with parents and carers
We recognise the importance of working together with parents/carers to educate as well as safeguard and promote the welfare of children.

Drakelow Park Flying High Academy will ensure that:

- We work with parents positively, openly, and honestly
- Parents are encouraged to discuss their issues or concerns about safety and welfare of children, including any worries about a child's emotional well-being or mental health. They will be listened to and taken seriously

- Parents are aware there is a whole school safeguarding approach to ensure that children are kept safe and well, and the school is part of Operation Encompass (previously known locally as Stopping Domestic Abuse Together/SDAT)
- We work with parents to ensure they understand that effective RSHE is important for promoting and protecting the wellbeing of all children
- We will provide parents with information about safeguarding issues, such as child exploitation (sexual and criminal), child-on-child abuse, emotional well-being/mental health, online safety/harms, including nudes and semi-nudes, harmful sexual behaviour, and terrorist/extremist material. We will also outline the support available to keep children safe within the school, locally and nationally
- Up to date and accurate information is kept about learners i.e.
    - names and contact persons with whom the child normally lives
    - those with parental responsibility
    - where reasonably possible, we hold more than one emergency contact number
    - if different from above, those authorised to collect the child from the setting
    - name and contact details of GP
    - any relevant court orders or any other factors which may impact on the safety and welfare of the child
- Information about our learners given to us by children themselves, their parents, or carers or by other agencies will remain confidential. Staff will be given relevant information on a 'need to know' basis in order to support the child
- It is made clear to parents and carers that the school has a duty to share information when there are any safeguarding concerns. Also, that there is a duty to keep records which relate to safeguarding work by the school, or partner agencies. These will be kept securely, kept apart from the main pupil/student record and only accessible to key members of staff. Copies of these records will be securely sent to any education provider to which the child transfers and a confirmation of receipt obtained
- Where we have reason to be concerned about the welfare of a child, we will always seek to discuss this with the child's parents or carers first. However, there may be occasions where we are not able to do this, for example, when by doing so, it places the child at additional risk or where it may not be possible to speak to the parents/carers

Section 6: Responding to concerns about a child's welfare

Key points to remember for any member of staff (including volunteers or supply staff) or visitors whenever they have any concerns about a child's welfare:

- In an emergency take the action necessary to help the child, for example, call 999
- Do not assume a colleague or another professional will share information that might be critical to keeping a child safe. Early information sharing is vital in keeping children safe, whether this is when problems first emerge, or when a child is already known to local authority children's social care
- Report your concern, including any possible private fostering arrangements, to the designated safeguarding lead or their deputy as soon as you can and by the end of the day at the latest.
- If you are unsure speak to the designated safeguarding lead or their deputy
- If the designated safeguarding lead or their deputy is not around, ensure the information is shared with the most senior person in the school that day. The concerns and any action taken must then be shared with the designated safeguarding lead as soon as it is possible
- A safeguarding approach must be taken when addressing concerns about nudes/semi-nudes, including those generated by AI , staff should not view, copy, print or share the images
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends, or family
- As soon as you are able, complete a record of the concerns. This should be on the same day and before the child is due to leave the school premises on CPOMS. *Our process for recording concerns is on the System CPOMS. All verbal conversations are recorded in writing and added to CPOMS alongside any other relevant documents.*

- Seek support for yourself if you are distressed. At Drakelow Park, the first point of contact is the Stephanie Beardmore in the first instance or deputy DSL.

Staff must always **immediately** inform the designated safeguarding lead or their deputy if there are any:

- Concerns that a child is presenting signs or symptoms of abuse, exploitation, or neglect, including suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- Concerns about a child carrying or using a weapon, or expressing intent to do so
- Searching incidents where there are reasonable grounds to suspect a learner was in possession of a prohibited item[7] or where a search has revealed a safeguarding risk
- Behaviour or changes in presentation, including changes in school attendance, which gives rise to suspicions that a child may not be receiving adequate care or may be suffering harm
- Hint or disclosure of abuse about or by a child
- Concerns that a person(s) who may pose a risk to children is living in a household with children present

[7] Prohibited items include knives and weapons, alcohol, illegal drugs, stolen items, tobacco, cigarette papers, fireworks pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be used, to commit an offence, or to cause personal injury to, or damage to property of; any person (including the learner).

- Concerns about online abuse including cybercrime, exploitation, harmful sexual behaviour, nudes and semi nudes and/or where any adult appears to be sexually communicating (e.g., email, text, written note or verbally) with a child
- Concerns about child-on-child abuse, including sexual violence and harassment
- Information which indicates that the child is living with someone who does not have parental responsibility for them (this is known as private fostering)
- Concerns that a child is at risk of domestic abuse or so-called 'honour-based' abuse, including forced marriage, marriage, or civil partnership under the age of 18, female genital mutilation (FGM), breast ironing, virginity testing or hymenoplasty
- Concerns that a child is at risk of radicalisation, child sexual exploitation or criminal exploitation, including financial exploitation and county lines; or that a child or their parent/carer may be a victim of modern slavery (trafficked)

There will also be occasions when you suspect that a child may be at risk, but you have no 'real' evidence or that the child may need support with their mental health. The child's behaviour, play and or appearance may have changed, their attendance at school may have reduced, their ability to concentrate and focus may have altered, or you may have noticed other behavioural and or physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

It is not the responsibility of the school staff to determine the truth of any disclosure or allegation; this is the responsibility of local authority children's social care. All staff however have a duty to recognise where extra support is needed or where there are complex needs or child protection concerns requiring intensive or specialist support.

Ensure you record these early concerns using *(add details of the concerns recording systems)* and following the protocols in Appendix 4: Safeguarding and Child Protection Recording. If a child or adult does begin to reveal that a child is being harmed, you should follow the advice in the section *'If a child chooses to tell a member of staff about a concern or abuse'*.

Remember: If you are unsure, you should always have a discussion with the designated safeguarding lead or their deputy

If a child chooses to tell a member of staff about a concern or abuse

It takes a lot of courage for a child, parent, carer, or other significant adult to disclose that they are worried or have concerns. They may feel ashamed, the abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. It is important they are reassured that they are being taken seriously, and that they will be supported and kept safe. They should not be made to feel they are creating a problem, blamed or ashamed for making a report. Reports, particularly those about sexual violence and harassment, if possible, should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases.

If a child or adult talks to you about any risks to a child's safety or well-being you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement.

During your conversation with the child (or their parent/carer):

- Allow them to speak freely, listen to what is being said without interruption and without asking leading questions
- Keep questions to a minimum and of an open nature ('TED questions' tell me, explain, describe) i.e., 'can you tell me what happened?' rather than 'did x hit you?'
- Remain calm and do not overreact – the child (or their parent/carer) may stop talking if they feel they are upsetting you
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- Avoid admonishing the child or adult for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but they may interpret it that they have done something wrong
- Do not be afraid of silences – remember how hard this must be for the child or adult
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what do other family members think about all this
- At an appropriate time tell the child or adult that to help them you must pass the information on
- Do not automatically offer any physical touch as comfort; it may be anything but comforting to a child who has been abused
- Tell the child or adult what will happen next. The child or adult may agree to go with you to see the designated safeguarding lead. Otherwise let them know that someone will come to see or contact them before the end of the day
- Report verbally to the designated safeguarding lead
- Write up your conversation as soon as possible and hand it to the designated safeguarding lead
- Children should not be asked to write statements about abuse or any concerns that may have happened to them or sign the staff record
- Seek support if you feel distressed. This may be sometime after the disclosure

Role of the designated safeguarding lead and their deputy following identification of concerns

Whenever the designated safeguarding lead or their deputy receive information regarding concerns about a child, including via police domestic abuse notifications via Operation Encompass they will:

- Review information received and assess if any urgent actions are needed, i.e. medical, child's immediate safety
- Check what is known about the child when they arrived (or not) at school today, how they are presenting physically and emotionally and if there are any changes in their behaviour
- Consider what is already known about the child and their family, including whether any previous concerns have been raised by staff or if they are already known to local authority children's services (targeted early/family help or social care)
- Consider what 'checks' need to be carried out and how best these can be achieved
- Inform relevant school staff who have a specific need to know i.e., class/form teacher and relevant support staff
- Where appropriate use relevant national, local, and education-based risk identifying, assessment tools and guidance to support the identification of needs and decision making, such as:

    - School-based records, assessments, and chronologies, including any contextual factors/placed based risks
    - DDSCP multi-agency guidance, tools and briefing notes which cover a broad range of safeguarding issues, see DDSCP safeguarding children procedures and documents library
    - National guidance and assessment tools e.g. Stop it now (sexual behaviours), Contextual safeguarding tools, Sharing nudes and semi-nudes: advice for education settings working with children and young people (2024)
- Not directly approaching a child or parent/carer about an incident when the school have received a domestic abuse notification and instead make general enquiries with the child about how they are. If a child initiates a conversation about the incident the guidance outlined in the section '*If a child chooses to tell a member of staff about a concern or abuse'* will be followed
- Following the Derby and Derbyshire Safeguarding Children Procedures and using the DDSCP Threshold document to support decision making about the child's needs and the appropriate level of support and intervention. Possible options include internal support via school pastoral systems, early/family help, early help assessment and referral to statutory services such as local authority children's services
- Considering whether the matter should be discussed with the child's parents or carers or whether to do so may put the child at further risk of harm, see Notifying parents
- If unsure about the action to take, including if a child protection referral should be made, seeking advice from local authority children's social care or another appropriate agency
- If the concerns are about radicalisation or violent extremism, contacting the local authority Prevent team for advice and where appropriate making a referral to the police Prevent Team
- Where the child has complex needs or where there are child protection concerns, referring as appropriate to Local Authority Children's Services via agreed processes, providing a copy of the early help assessment, action plan and any other relevant assessments
- Notify the appropriate Local Authority Children's Services of any private fostering arrangements, to allow the local authority to check the arrangement is suitable and safe for the child. Notifications will contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and made in writing[8]
- If a child is at risk of immediate harm, and/or where it is believed a criminal offence has been committed, including sexual violence and harassment, referring to the police. See NPCC When to call the police; guidance for schools and colleges. Safeguarding considerations must take priority and include how screening, searching, and confiscating powers will be used safely, proportionately, and appropriately, including undertaking a police strip search on a child and the requirement for children to have an appropriate adult.; see Searching, screening and confiscation at school guidance (2022)
- In all cases where children are believed to be at risk of exploitation, complete and submit an Information Sharing Form for Professionals - Operation Liberty to raise concerns and share information

Notifying parents/carers

The school will normally seek to discuss any needs or concerns about a child with their parents or carers. Where an early help assessment would benefit the child and their family the most appropriate member of staff should approach the parent/carer to take this forward. In situations

[8] See statutory guidance Children Act 1989: private fostering

where there are serious needs or child protection concerns the designated safeguarding lead or deputy will contact the parent or carer. However, if the setting believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from local authority children's social care.

Pastoral/school-based support (universal and community-based support)
In all cases the school will consider what support could be offered within the setting via pastoral support processes. Pastoral support will be kept under constant review to ensure that it is effective. Pastoral Support in our setting is responsive to need and is specifically tailored to each individual child or small group of children

Early help support and assessment (emerging needs/additional needs – will be known as Family Help)
Where a child is likely to require co-ordinated support from more than one service to prevent escalation and improve outcomes. This is reflected in the local Family Help offer, bringing together targeted early help and, where appropriate, support that may sit alongside or inform statutory assessments and plans. The designated safeguarding lead or their deputy will support the completion of an early help assessment (EHA) and if needed, co-ordinate a team around the family (TAF). The school offers early help to children and families as soon as concerns are identified, ensuring support is provided at the earliest opportunity. The Safeguarding Team, working closely with the SENDCo and Inclusion Team, leads on early help within the school and will complete or contribute to Early Help Assessments (EHAs) and make referrals where appropriate. The school works in partnership with families and external agencies to coordinate support and improve outcomes for children.

Whenever a child and their family are supported via an early help assessment, the school will keep this under constant review and should the child's situation appear not to be improving or getting worse, consideration will be given to a referral to local authority children's services.

For more information about the early help assessment process see Derby and Derbyshire Safeguarding Children; Providing early help procedure.

Intensive support
Where a child requires services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their health and development and/or are disabled they are likely to require specialist services. The designated safeguarding lead or their deputy will refer to local authority children's services and provide a new or updated early help assessment and team around the family action plan. See Derby and Derbyshire Safeguarding Children; Making a referral to Children's Social Care procedure

Referral to local authority children's social care (specialist services)
Concerns about a child's welfare will be referred to local authority children's social care using the agreed referral process as outlined in Derby and Derbyshire Safeguarding Children; Making a referral to Children's Social Care procedure.

If at any point there is a risk of immediate serious harm to a child, an immediate referral should be made to local authority children's social care and/or if appropriate, the police

Anybody can make the referral

Where it is believed that a child is suffering or likely to suffer significant harm, a referral should be made to local authority children's social care. If the child protection concerns are urgent, the designated safeguarding lead or deputy will make a referral to local authority children's social care by phone and follow this up in 'writing' via the local authority Online Referral System. Non-urgent cases will be referred via the local authority Care Online Referral System. In Derby submission of an early help assessment, or equivalent assessment, to the weekly Vulnerable Children meeting (VCM)/ Family Help Forums (FHF) in the relevant locality can also be made.

In exceptional circumstances, such as in an emergency or a genuine concern that appropriate action hasn't been taken, any staff member can refer their concerns directly to local authority children's social care; however, they should inform the designated safeguarding lead or deputy as soon as possible.

Female genital mutilation (FGM)

If the referral is about a 'known' case of female genital mutilation (FGM), in addition to a referral to local authority children's social care, the individual teacher also has a mandatory reporting duty; see Mandatory Reporting of Female Genital Mutilation; procedural information (2015). Under this duty, 'known' cases of FGM where a girl under 18 informs the person that an act of FGM has been carried out on her, or where physical signs appear to show that an act of FGM was carried out, this must be reported to the police on 101. This is a personal responsibility in addition to the referral to local authority children's social care and the professional who identifies FGM and/or receives the disclosure should make the report by the close of the next working day.

Action following referral to local authority children's social care

The designated safeguarding lead, their deputy or other appropriate member of staff will:

- Where a referral was made by phone follow up the referral in writing using the online referral system within 48 hours and attaching any existing assessment e.g., early help assessment. In all cases the school will also include information held about any place-based risks (harm outside of the home)
- Be aware that local authority children's social care should make a decision within one working day of the referral being made about what course of action they are taking and let the school know the outcome. If the information is not forthcoming, the designated safeguarding lead or another appropriate member of staff should follow this up
- Maintain contact with the allocated social worker and support them or other agencies following any referral
- Contribute to any strategy discussion or meetings
- Support any Section 47 enquiries or statutory assessments that are carried out
- Provide a report for, attend, and contribute to any initial and review Child Protection Conference. This includes sharing any reports with parents/carers and where appropriate, the child
- Share the content of this report with the parent/carer and if appropriate the child, prior to the meeting
- Attend core group meetings for any child subject to a Child Protection plan or Child in Need meeting for any child subject to a Child in Need plan
- Whenever there are concerns about the outcome of a Child Protection Conference, use the appropriate Derby and Derbyshire Child Protection Conference Professional Dissent Process

- Where a child on a Child Protection plan, Child in Need plan or who is Looked After moves from the school or if there are unexplained absences from school, immediately inform the child's social worker/key worker in local authority children's social care
- If after the referral the child's situation does not appear to be improving the designated safeguarding lead should press for re-consideration to ensure their concerns have been addressed and the child's situation improves. See Derby and Derbyshire Multi-Agency Dispute Resolution and Escalation Policy

Information sharing[9]

The school recognises the importance of information sharing between the school and local agencies to effectively safeguard our learners. The setting operates with regard to HM Government Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024), Information Commissioner's Office Sharing information to safeguard children and young people in the education sector in the UK, Data protection in schools and DDSCP Information Sharing Guidance for Practitioners.

All staff will be mindful of the seven golden rules to sharing information (See Appendix 3) and Data Protection laws (Data Protection Act (2018), UK General Data Protection Regulation (UK GDPR) obligations and Data (Use and Access) Act (2025)). Staff are aware that the Data Protection laws do not prevent or limit the sharing of information for the purposes of keeping children safe and promoting their welfare, rather, they provide the legal framework under which information can, and in some cases, must be shared.

School staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of a child, whether this is when problems are first emerging, or where a child is already known to local authority children's social care. Professional judgement should be used to ensure the information shared is focused and proportionate.

If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy, who will seek advice from our Data Protection Officer if needed

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

All information sharing outside of 'business as usual', should be recorded on the appropriate logs

Staff should only discuss concerns with the designated safeguarding lead or deputy (or the most senior person on the premises if they are unavailable), headteacher or chair of governors/trustees (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Where appropriate, consent will be sought to share information. However, where there are safeguarding concerns about a child, information will be shared with the appropriate organisations such as local authority children's social care under alternative, appropriate, lawful basis[10]. In most

[9] Following consultation specific Information sharing duty statutory guidance is expected to be published in Autumn 2026

[10] See Information Sharing Advice for practitioners providing safeguarding services for children,

cases concerns will be discussed with parents and carers prior to the referral taking place unless doing so would increase risk.

Details of whom the school shares information with, in what circumstances and under what lawful basis can be found in our published Privacy Notices.

Record keeping
All concerns, discussions and decisions made, including the rationale for those decisions, should be recorded in writing following the protocols in Appendix 4: Safeguarding and child protection recording *(amend as per school processes)*. This includes instances where referrals were or were not made to another agency, such as local authority children's social care or the Prevent programme etc. If in doubt about recording requirements staff should discuss with the designated safeguarding lead or their deputy.

Records of concerns documentation, referrals and other written safeguarding information are kept in a child protection file for each child and stored separately from each child's education file; this file is 'tagged' to indicate that separate information is held. Child protection files are confidential and stored securely and only made available to relevant individuals.

Records will include:

- A clear, factual and comprehensive summary of the concern which distinguishes between observed concerns, professional opinion and historic information (see Appendix 4)
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached, the rationale for these, and the outcome, as well as a review of any progress made
- Any professional differences of opinion about the safety of a child will also be recorded; see DDSCP Multi Agency Dispute Resolution and Escalation Policy and Derby and Derbyshire Child Protection Conference Professional Dissent Process

When a child leaves the school, the designated safeguarding lead will ensure a copy of these records will be sent securely as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term) to any school or other education setting to which the child transfers and a confirmation of receipt obtained. The child protection file transfer will be separate to the main pupil file. This will allow the new provider to continue supporting the child and have the support in place for when the child arrives.

When child protection files are transferred, the school will include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs.
The designated safeguarding lead will also consider if it would be appropriate to share any information with the new education provider in advance of the child leaving e.g. children who have or who have had a social worker and those receiving support through the Channel programme.

Where the school considers that safeguarding information is unclear or incomplete, the DSL will seek clarification where necessary to support effective safeguarding.

young people, parents and carers, Why data protection legislation does not prevent information sharing, pages 9 -11

The designated safeguarding lead, their deputy/ies and key staff such as special education needs co-ordinators will be informed when a child's safeguarding/child protection file is received.

Support for those involved in a safeguarding/child protection issue

Child neglect, abuse and exploitation are devastating for children and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- Taking all suspicions and disclosures seriously
- Nominating a link person who will keep all parties informed and be the central point of contact
- Nominating a 'case manager' where a member of staff is the subject of an allegation made by a child
- Responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- Storing records securely
- Offering details of helplines, counselling, or other avenues of external support
- Following the procedures laid down in our whistleblowing, complaints, and disciplinary procedures
- Co-operating fully with relevant statutory agencies
- All staff are offered support when reporting significant safeguarding concerns.
-

Section 7: Child-on-child abuse, including sexual harassment and violence

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

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

The school recognises that children may abuse their peers physically, sexually, and emotionally. There is a zero-tolerance approach to child-on-child abuse; abuse is abuse and this will not be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up' as this can lead to a culture of unacceptable behaviours, misogyny and an unsafe environment for children. Drakelow Park have a commitment to the DDSCP Child-on-Child Abuse Strategy recognising that the issue requires a partnership-wide strategic response.

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

ALL CASES MUST BE LOGGED ON CPOMS AND REVIEWED BY A DSL AS SOON AS POSSIBLE FOLLOWING AN EVENT.

What is child-on-child abuse?

- Keeping Children Safe in Education (2026) defines child-on-child abuse as most likely to include but not limited to:
    - Bullying (including cyberbullying, prejudice based and discriminatory bullying)
    - Abuse within intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
    - Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and /or encourages physical abuse)
    - Serious physical assault and harm, or the threat of harm with a weapon
    - Harmful sexual behaviour, sexual violence, such as rape or penetration including with an object and sexual assault (this may include an online element which facilitates, threatens and /or encourages sexual violence)
    - Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may include misogyny/misandry, be standalone or part of a broader pattern of abuse
    - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
    - Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated by AI
    - Upskirting[11], which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
    - Initiating/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- It can also include causing someone to engage in extremist or radicalising behaviour
- Child-on-child abuse exists on a continuum and different forms of abuse may overlap
- It can affect any child/young person of any age and sex and can occur between two children or through a group of children abusing a single child or group of children
- Sometimes vulnerable children are targeted. For example:
    - Those living with domestic abuse or with intra-familial abuse in their histories
    - Young people in care
    - Those who have experienced bereavement through the loss of a parent, sibling, or friend
    - Black and minority ethnic children are under identified as victims but are over identified as perpetrators
    - There is recognition it is more likely that girls will be victims and boys are likely to be perpetrators. However, both girls and boys can experience child-on-child abuse, but they are likely to experience it differently e.g., girls being sexually touched/assaulted or boys being subject to homophobic taunts/initiation/hazing

[11] The Voyeurism (Offences) Act (2019) – upskirting is a criminal offence and anyone of any gender can be a victim

(rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group)
    - Evidence also shows that children with disabilities, and lesbian, gay, bisexual, or gender questioning children are at greater risk
- It is influenced by the nature of the environments in which children/young people spend their time - home, school, peer group, online and community - and is built upon notions of power and consent. Power imbalances related to gender, social status within a group, intellectual ability, economic wealth, social marginalisation etc, can all be used to exert power over a peer
- Child-on-child abuse involves someone who abuses a 'vulnerability' or power imbalance to harm another and has the opportunity or is in an environment where this is possible
- While perpetrators of child-on-child abuse pose a risk to others, they are often victims of abuse themselves

Preventing child-on-child abuse

All staff know that child-on-child abuse is preventable and know that timely, evidence-based support can be key to preventing children from going on to commit harm, abuse or violence. There is a whole school approach to preventing child-on-child abuse, including child-on-child sexual violence and sexual harassment; this forms part of the whole school approach to safeguarding. The school will seek to minimise the risk of child-on-child abuse by ensuring an approach that prepares learners for life in modern Britain. The establishment has a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life.

The school provides a safe environment, is alert to when children might be at highest risk around the school day, promotes a culture of positive standards of behaviour, takes steps to address inappropriate behaviour, has effective systems in place where children can confidently raise concerns knowing they will be taken seriously and provides safeguarding through the curriculum via relationships education/relationships and sex education, online safety, and other curriculum opportunities. This may include targeted work with children identified as vulnerable or being at risk and developing risk assessment and targeted work with those identified as being a potential risk to others.

All staff understand the importance of challenging inappropriate behaviours between peers that are abusive in nature. We recognise the escalatory nature of misogyny and downplaying certain behaviours will not be tolerated or passed off. Staff will maintain an attitude of '*it could happen here'* and all inappropriate behaviour will be addressed.

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

- Drakelow Park Flying High Academy behaviour policy, including bullying/ online bullying and prejudice-based bullying and school screening, searching, and confiscating powers and how they will be used safely, and appropriately, including police strip searches
- Online safety policy and other associated issues, including making or sharing nudes and semi-nudes and extremist material
- Attendance policy
- Relationships education/ relationships and sex education
- Drakelow's curriculum, curriculum principles, Personal development and character education.

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

See page 24 *Systems for children to report concerns and abuse* for information about the systems in place for children to confidently report abuse.

If staff have any concerns regarding child-on-child abuse, which may have taken place on or off-site, they should speak to the designated safeguarding lead or deputy

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

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

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

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

- What are the wishes of victims in terms of how they want to proceed?
- What is the nature, extent and context of the behaviour including verbal, physical, sexual (including making or sharing of nudes/semi-nudes) and/or online abuse? Was there coercion, physical aggression, bullying, bribery or attempts to ensure secrecy? What was the time, location, duration, and frequency? Is the incident a one off or a sustained pattern of abuse? (Remember there may be other forms of abuse in addition to what has been reported) Were other children and /or adults involved? Has a crime been committed and/or have any harmfully sexual behaviours been displayed?
- What is the child's age, development, capacity to understand and make decisions (including anything that might have had an impact on this e.g., coercion), and family and

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

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

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

All decisions will be made in the best interests of the children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator. In all cases, the initial report should be carefully evaluated on a case-by-case basis with the designated safeguarding lead taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. The designated safeguarding lead will refer to relevant assessment tools and guidance as appropriate such as:

- Keeping Children Safe in Education (2026) part five
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Searching, screening and confiscation at school
- Behaviour in schools
- School suspensions and permanent exclusion
- Stop it Now Sexual Behaviours Traffic Light Tool
- DDSCP Thresholds Document
- DDSCP Safeguarding Children Procedures, in particular Children who present a risk of harm to others and Safeguarding children from online harms procedures
- When to call the police – guidance for schools and colleges

When appropriate the designated safeguarding lead may seek further advice from local or national safeguarding contacts as outlined in Section 4: Key safeguarding contacts.

Whenever there is an allegation of abuse, including concerns about sexual harassment and violence, made against a child, the designated safeguarding lead and other appropriate staff will

draw together separate risk and needs assessments and action plans to support the victim and the alleged perpetrator. These will consider:

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

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

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

Where appropriate incidents may be managed internally (universal and community based support), via early help (emerging/additional needs – which will be known as Family Help) or through local authority children's social care (via intensive and specialist services which incudes child protection concerns); reports to the police will be run in parallel with children's social care as outlined in the Derby and Derbyshire multi-agency safeguarding procedures, in particular Children who Present a Risk of Harm to Others and Safeguarding children from online harms procedures.

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

The school uses the Contextual Safeguarding School Beyond Referrals Self-Assessment Toolkit & Guidance to self-assess our response to harmful sexual behaviour. All relevant policies will be updated to reflect the lessons learnt and consideration given to the wider cultural issues within the school that enabled the behaviour to occur.

Where the victim or alleged perpetrator transfers to another education setting, the designated safeguarding lead will ensure the new provider will be made aware of any on-going support needs (and will discuss this with the victim and where appropriate their parents, as to the most suitable way of doing this) as well as transferring the safeguarding/child protection file. In the case of the alleged perpetrator, where appropriate, this will also include potential risks to other children and staff. See Section 6. Responding to concerns about a child's welfare - record keeping.

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

Section 8: Safer recruitment and selection of staff

The school uses best practice and has adopted robust recruitment procedures as outlined in Keeping Children Safe in Education (2026) to deter and prevent people who are not suitable to work with children from applying, securing employment or volunteering opportunities in the school. We apply all appropriate measures for our staff, including volunteers, agency, and third-party staff (supply staff) trainees/student teachers, governors/trustees, and contractors. This forms a vital part of the whole school approach to safeguarding and is an essential part of creating a safe environment for our learners.

Those involved with the recruitment and employment of our staff have received appropriate safer recruitment training and at least one person who conducts an interview has completed safer recruitment training. At Drakelow, our training is delivered through DCC, NSPCC and The National College.

Safer practice in recruitment means thinking about and including issues to do with child protection and safeguarding children at every stage of the process from advertising, job descriptions/person specifications, application forms, shortlisting, employment history and references, selection, and pre-appointment vetting checks.

Everyone who works in the school, including volunteers and school governors will have appropriate Disclosure and Barring (DBS) and teacher status, teacher, and teacher prohibition checks or where appropriate GTCE sanctions and restrictions. Governors/trustees/proprietors will also require section 128 checks.

Other checks that may be necessary for staff, volunteers, and others:

- **Individuals who have lived or worked outside the UK** – will undergo the same checks as all other staff in the school and further checks deemed appropriate to ensure suitability
- **Agency and third-party staff (supply staff)** - the school will obtain written notification from any agency or third-party organisation provider that they have carried out checks on an individual who will be working at the school that we would otherwise perform.
- **Contractors** - where the school uses contactors to provide services the contact will set out their safeguarding requirements.
- **Trainee/ student teachers** – applicants salaried by the school will undergo all necessary checks by the school. The initial teacher training provider will carry out necessary checks on fee funded trainee teachers and will provide written confirmation that these have been carried out and judged suitable to work with children.
  Volunteers - will undergo all necessary checks by the school and if they are in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight the school will obtain an enhanced DBS check with children's barred list information.

The school maintains a single central record of pre-appointment checks consistent with Keeping Children Safe in Education (2026). The school uses EveryHR* to maintain a single central record of pre-appointment checks

See the school recruitment and selection policy/disclosure and barring (DBS) policy and supervision of volunteer's statement.

Visitors
The school premises provide a safe learning environment with secure access. We recognise there are different types of visitors, those in a professional capacity, children's relatives or others visiting for school activities or visitors via a third party and have processes in place to ensure they are suitable, are checked and monitored as appropriate.

We recognise the importance of allowing access for local authority children's social care to conduct, or to consider whether to conduct an assessment and that staff from other partner agencies may need to visit to see a child or young person to either safeguard or promote their welfare. For visitors who are there in a professional capacity, the school will check ID and be assured that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks).

External speakers/visitors
The school may ask external speakers or visitors to work with children or provide assemblies on subjects such as online safety, relationships/relationships and sex education and health education. On these occasions we refer to the Effective Working Together Guidance: Supporting Schools to Deliver the PSHE Programme guidance. The school will undertake an assessment of the educational value, the age appropriateness of what is going to be delivered and whether relevant checks will be required, and an assessment made of what will be appropriate supervision. There will also be an agreement made in advance of the session/s on how a safeguarding report should be dealt with by an external visitor. See school policy/agreement for visiting speakers.

Alternative provision
The school continues to be responsible for the safeguarding any learner placed with an alternative provision provider. Learners in alternative provision often have complex needs and are vulnerable to additional risk of harm. We will ensure that the provider meets the needs of the learner.

The school obtains written confirmation from the provider that:

- Appropriate safeguarding checks have been carried out on their staff and individuals working for the provider; and
- The provider will inform the school of any arrangements that may put the child at risk i.e., staff changes, so the school can ensure that appropriate safeguarding checks have been carried out on new staff.

The school has arrangements in place to ensure attendance is monitored and that there are effective safeguarding arrangements within the provision. Arrangements include always knowing where a child is based during school hours, the address of the provider, any satellite sites and subcontracted provision a learner may attend .

Alternative provision placements are regularly reviewed to provide assurance that the learner is regularly attending, and the placement continues to be safe and meets the child's needs. Senior school staff including members of the school safeguarding team will regularly visit to monitor the provision in place including the effective safeguarding arrangements within the provision.

Whenever safeguarding concerns arise, placements are immediately reviewed and terminated, if necessary, unless or until concerns have been satisfactorily addressed.

School will complete the Trust Alternative Provision Checklist and the Alternative Provision Transition Plan as part of Due Diligence ensuring written confirmation from the provider that appropriate safeguarding checks have been carried out. This must then be checked and approved by Flying High Inclusion Lead Grant Worthington. *Senior school staff including members of the school safeguarding team will regularly visit to monitor the provision in place including the effective safeguarding arrangements within the provision.*

Use of school premises for non-school activities

Our school safeguarding arrangements will apply to all activities provided by the school under the direct supervision of school staff. Where activities are provided by another body, the governing body/trustees/proprietor will seek assurance that the provider has appropriate safeguarding/child protection policies and procedures in place, as outlined in the Keeping children safe in out-of-school settings guidance. This includes arrangements to liaise with the school where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll/attend the college. Safeguarding requirements are included in all lease/hire agreements.

Section 9: What staff should do if they have a safeguarding concern or an allegation about another member of staff or concerns about safeguarding practices within the school/ college

As part of our whole school approach to safeguarding there are processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. Our culture and environment support all of our staff to discuss matters that concern them in the workplace and, where appropriate, outside the workplace (including online) which may have implications for the welfare and safety of children.

All concerns and or allegations about adults working in or on behalf of the school (including supply teachers, trainee teachers, contractors, and volunteers) will be reported, recorded, and dealt with promptly and appropriately.

This includes whenever the school receives an allegation relating to an incident that happened when an individual or organisation was using their school promises for the purposes of running activities for children.

By doing so everyone in the school will:

- Create and embed a culture of openness, trust, and transparency
- Help to identify concerning, problematic, or inappropriate behaviour at an early stage
- Minimise risk of abuse
- Ensure that school staff are clear about professional boundaries and act within these, in accordance with the ethos and value of the school

The school recognise there are two levels of allegation/concern

1. Allegations that **may** meet the harms threshold
2. Allegations/concerns that **do not** meet the harms threshold, also known as 'low level concerns'

Our response to concerns/allegations is consistent with the DDSCP Safeguarding Children Allegations against Staff, Carers and Volunteers procedure.

1. Allegations that may meet the harms threshold

This is where an allegation might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. Where it is alleged that anyone working in the establishment, including supply teachers, contractors and volunteers has:

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

This includes any behaviour that may have happened outside school and is known as transferable risk.

If you have concerns about another staff member
Staff who are concerned about the conduct of a colleague (including supply staff, contractors, and volunteers) must remember that the welfare of the child is paramount.

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff then this should be reported without delay to the headteacher, who will consider whether an onward referral to the LADO is required. Where there are concerns/allegations about the headteacher, this should be referred to the chair of governors. In a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the Local Authority Designated Officer (LADO). The member of staff should make a record which will include time, date, place of incident, persons present, what was witnessed, what was said etc; this should then be signed and dated. All concerns and allegations must be recorded and reported in accordance with the school's safeguarding procedures and using the school's agreed recording system and forms (see Appendix 1: Example Concerns Form). Records should be factual, signed, dated and submitted without delay. Where an allegation meets the threshold for further consideration, the investigation lead will liaise with the Flying High Partnership (FHP) Safeguarding Lead, Trust Safeguarding Team and FHP HR Team to ensure that safeguarding, employment and statutory procedures are followed appropriately.

Looking after the welfare of the child
Where a child has been harmed, or there is an immediate risk of harm to a child or if the situation is an emergency, local authority children's social care should be contacted and where appropriate the police. It is the designated safeguarding lead's responsibility to ensure the child is not at risk and refer cases of suspected abuse to children's social care.

For further information about how concerns which may meet the harms threshold will be investigated, recorded, and managed, including non-recent allegations by a child and referrals to the Local Authority Designated Officer (LADO) see Drakelow Park Flying High Academy staff behaviour (code of conduct) policy, which incorporates low-level concerns, managing allegations against staff and whistleblowing.

2. Concerns that do not meet the harm threshold
Allegation/concerns that do not meet the harms threshold are referred to as 'low-level concerns". A low-level concern does not mean it is insignificant, rather that the behaviour towards the child does not meet the harm threshold as outlined above.

A low- level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is:

- Inconsistent with the staff behaviour (code of conduct) policy, including inappropriate conduct outside of work, or
- Does not meet the harm threshold or is not serious enough to consider a referral to the Local Authority Designated Officer (LADO)

The behaviour can exist on a wide spectrum. Further information about distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour can be found in the school staff behaviour (code of conduct) policy.

Staff should share low-level concerns in confidence with the following people;

1.Headteacher or chair of governors if the Headteacher is not available. Low-level concerns about the headteacher/principal should be reported to the chair of governors/FHP Paul Goodman in writing as soon as possible.

Low-level concerns about the headteacher/principal should be reported to the chair of governors via their email or by calling.

Staff are also encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or on reflection they believe they have behaved in a way that they consider falls below the expected professional standards.

The headteacher will be the decision maker in respect of all low-level concerns; however, this may be undertaken in collaboration with the designated safeguarding lead. Headteachers can seek advice from FHP Inclusion Lead or FHP Safeguarding Lead if unsure of best course of action.

Reports about supply staff or contractors will be notified to their employers.

All low-level concerns will be recorded in writing to include details of the concern, the context and the action taken. For further information about the procedure for recording and responding to low-level concerns see school staff behaviour (code of conduct) policy and be logged on EveryHR.

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

For information about how to raise concerns with the senior leadership team or other channels see staff behaviour (code of conduct) policy, which incorporates the whistleblowing routes available to staff.

Appendix 1 Example concerns form
Either adopt or amend in line with CPOMS

Education settings must ensure that volunteers, staff, and governors are able to record concerns about:

- The welfare of a child or young person; and
- The behaviour of a volunteer, member of staff, trainee teacher, governor or person connected with the school

The following headings illustrate the minimum information that should be included in the local arrangements that is agreed within the individual education setting.

Principles
A statement should be included on the form used in the setting that confirms:

"Any member of the staff, including volunteers, must record any concerns about a child or young person. This form must be completed as soon as possible after the discovery of the concern. If the concern is about:

- *The welfare of a child, it must be sent to the designated safeguarding lead*
- *The behaviour of any member of staff, it must be sent immediately to the headteacher, or the chair of governors/management committee or equivalent if the allegation is against the headteacher/principal or where the headteacher/principal is the sole proprietor of an independent school the allegations should be reported directly to the Local Authority Designated Officer (LADO).*

If the concerns are immediate, please inform an appropriate person straight away."

Concerns about a child or young person

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

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

Please provide a description of any incident/s or anything you see or have been told by a child, or another person. Record any visible injuries or ask the child/young person to point to where else it is sore/hurts. Do not remove or lift clothing for the purpose of the examination unless the injury site is freely available because of treatment or take photos of injuries. If photos of injuries are required for evidence purposes, then this should be done by the police. Remember to make clear what is fact and what is hearsay/opinion. Note the language and terminology used by the child, or adult, and be clear about who has said what. Continue on a separate sheet if necessary.

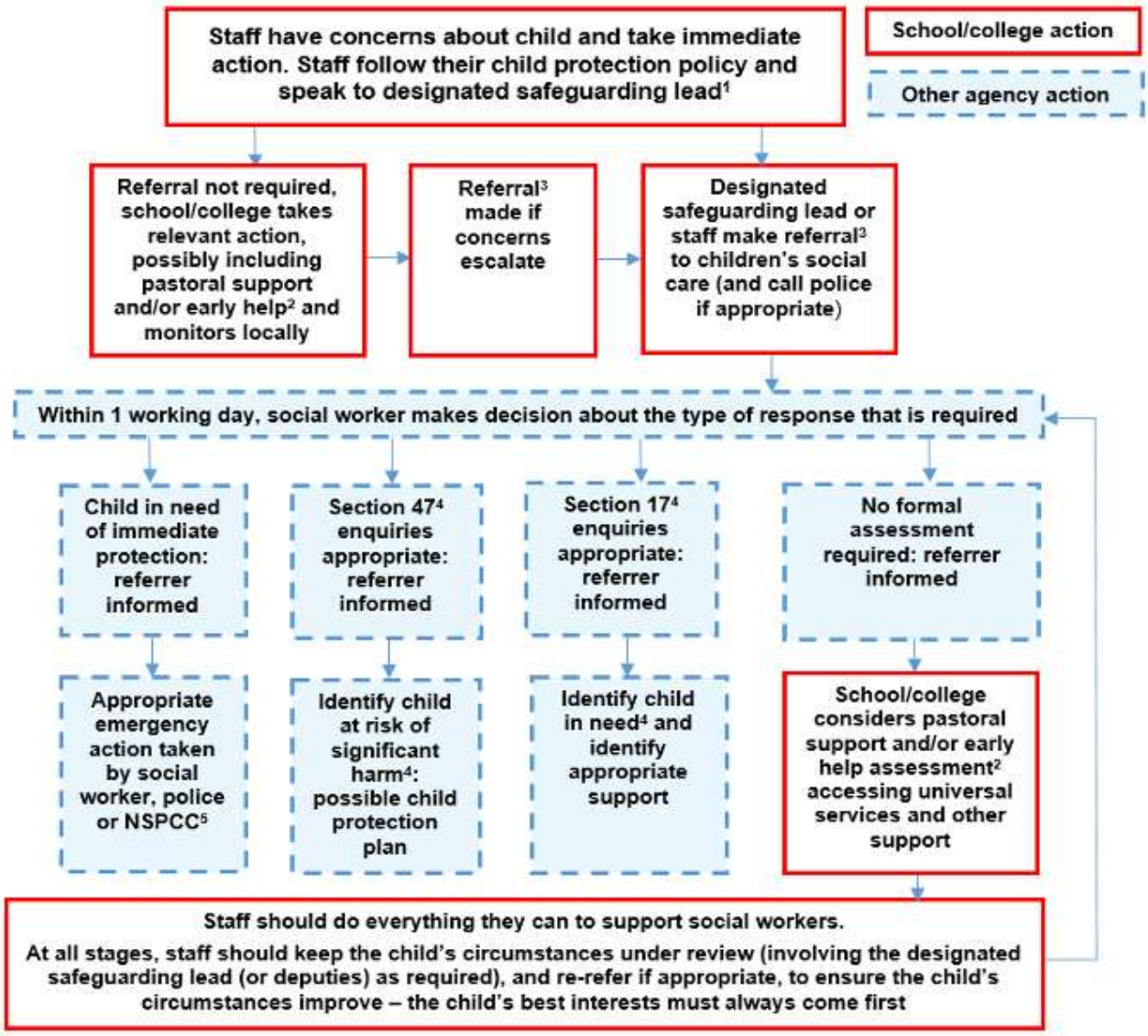
Has any action already been taken in relation to this concern? For example, child taken out of class, first aid

Name of person concerns reported to	**Date**

Action to be taken / recommendations from designated safeguarding lead

Name of person completing form	**Signature**	**Date and time**

Appendix 2	Safeguarding flowchart



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

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

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

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

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

Taken from Keeping Children Safe in Education for information only (2026), page 27

Appendix 3 The seven golden rules to sharing information (including personal information)

1. **All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.** The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework[12] to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

2. **When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child[13] and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.** You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

3. **You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** You need a lawful basis[14] to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm[15], consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

4. **Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer[16]), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.

5. **When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**

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[12] Where processing or sharing personal data, you must follow the Information Commissioner's Code of Practice for Data Sharing which should be read alongside the ICO's guide to GDPR

[13] Engagement with a child where it is appropriate to based on their level of assessed competency. See NSPCC Learning Gillick competence and Fraser guidelines

[14] A guide to lawful basis

[15] See Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (2024) page 9 for further advice on appropriate lawful basis or use the IOC Lawful basis interactive guidance tool

[16] Data Protection Officers, IOC

6. **Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.** Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

7. **Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

   Taken from Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (2024) HM Government

Note:
The Derbyshire Education Data Hub advise schools ensure there is a good working relationship between DSL and Data Protection Officer (DPO). Work together to determine when information should be shared, how and under what lawful basis. Ensure all decisions are properly recorded and do not attempt to redact information without the support and advice of your Data Protection Officer (even if your safeguarding recording software offers this functionality).

Appendix 4 Safeguarding and child protection recording

(Please note: this appendix has been developed and published for schools by the Derbyshire Data Protection Hub)

Introduction

The Independent Inquiry into Child Sexual Abuse (IICSA) found that proper creation, maintenance and long-term retention of records is an important part of supporting victims of Child Sexual Abuse (CSA) and bringing perpetrators to justice. This is because victims and survivors may take decades to come to terms with what has happened to them and potentially to decide to take action to report a crime.

The IICSA Inquiry recommended that records relating to CSA should be retained for 75 years. It also recommended that the UK government directs the Information Commissioner's Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. The Inquiry report stated that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

A Code of Practice has not yet been published, but [School name] is committed to ensuring practices at the school are reflective of IICSA recommendations.

Statement of Intent

[Insert name of School] is aware that creation, maintenance and retention of child protection, safeguarding and CSA records must be carried out with the understanding that access to records may be required many decades after records are created.
This document should be read in conjunction with the school's / Trust's Record Retention Policy. [Note to schools- you should review and update your Retention Policy if it still refers to no record deletion whilst the IICSA inquiry is ongoing].

How to record safeguarding/child protection concerns.
Given these very long retention periods, [school name] will ensure that safeguarding, child protection and CSA records are written in such a way as to be intelligible in the future and without any additional knowledge of the school, its staff, pupils or systems. Staff will be trained in good practice.

Our records will:

- Be written by the school's Designated Safeguarding Lead (DSL), Deputy (DDSL) or other suitably trained staff [delete / amend as required]
- Identify the author by name and role

- Make clear it where the person who is recording the information is not the person who has seen or heard the issue, and identify all relevant parties by name and role
- Use full names (not initials) of staff, other adults and parents/family members (full name in this context means first and surname)
- Ensure staff roles / job titles are included
- Ensure family relationships are clear
- Use full name (not initials) of child whose record this is
- Use full name (not initials) of any other child involved and ensure a mirror record is on their file, if appropriate
- Not use initials when recording names
- Where individuals have the same or similar names, ensure there is a distinguishing factor, eg middle name, job title, DoB etc
- Ensure all spelling, punctuation and grammar is correct.
- Use appropriate language to describe events, not slang, shorthand, local terminology or asterixis.
- Ensure quotes are properly identified as such and attributed to their owner
- Be objective and avoid opinion. If opinion is necessary, ensure it is identified as such and attributed to its owner.

How records are stored
Drakelow Park use CPOMS to record and store child protection and safeguarding records.

This method was risk assessed in conjunction with our Data Protection Officer using a Data Protection Impact Assessment to determine the nature, scope and context of the data processing. This is subject to regular review.

We inform our pupils, families and staff that we process their personal data for this purpose via our Privacy Notices which are published on the school website.

Any related physical first-hand notes will be accurately transcribed into *CPOMS* and include the following statement: “This is an accurate transcription of notes taken at (insert date & time)”. Diagrams will be scanned in. Any recordings will be also be securely retained.

The transfer of pupil safeguarding records
Keeping Children Safe in Education states that “where children leave the school or college, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file.”

When a child leaves [name of school], all pupil records, including safeguarding, child protection and CSA records must be transferred in a secure manner, to the child’s new school. The legal basis and time scale for this can be found in The Education (Pupil Information) (England) Regulations 2005, parental consent is not required.

All copies of data held by the school that the child has departed will then be deleted or retained in line with the retention policy, including all paper records and data stored electronically. A record could be kept for tracking and auditing purposes only.

Schools may retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the school's historical archive. Where we intend to create and maintain these records, this will be noted on the retention policy. In some instances, we may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If we do retain pupil records, we will justify this retention and document the reasons for doing so, and will carry out a Data Protection Impact Assessment where required.

Responsibility for maintaining the pupil record, including retaining records relating to Child Protection, Safeguarding and CSA passes to the 'last known school'.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

Tertiary colleges are not included in this definition, therefore the school will retain the record. However, the college must receive a copy of the child protection file, as per the requirements of KCSiE above.

Retention of Records relating to Staff

[school name] retains staff records in line with the school Record Retention Policy. Where staff records pertain to CSA they will be retained for up to 75 years, subject to review, as set out in the Policy.

As stated above regarding the long-term retention of minimal pupil records, we may wish to retain very basic 'skeleton' records about staff that have worked in the school/trust beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates and evidence of Single Central Record checks. This may be useful when we need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of our historical archive. If we intend to create and maintain these records, this will be noted on the retention policy.

END