# Denby Free CofE VA Primary School

## Child Protection and Safeguarding Policy September 2026

**Date policy last reviewed:** September 2026

**Signed by:**

_____ **Headteacher** **Date:** _____

_____ **Chair of governors** **Date:** _____

**Change Table History**

| Version | Reviewed /Modified by | Change History |
|---|---|---|
| 4 | JC | **Definitions**<br>• Definition of 'safeguarding and promoting the welfare of children' – amended to reflect the updated version of Working Together to Safeguarding Children (2023)<br>• 'Trusted' adult replaced with 'Safe' adult.<br><br>**Legal Framework**<br>• Legislation, statutory and non-statutory guidance documents have been updated reflecting the latest versions. Web links have been updated. NB: there are no new legal frameworks or guidance documents.<br><br>**Roles and Responsibilities**<br>Under 'the DSL has a duty to' section, explicit reference made to ensuring that safeguarding records include information regarding *the decisions made, and whether or not referrals have been made.*<br><br>**Early Help**<br>Additional bullet points added to expand the list of pupils who may benefit from early help to reflect working Together to Safeguard Children (2023):<br>• having family members in custody or is affected by parental offending.<br>• have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a Pupil Referral Unit.<br><br>**Abuse, neglect and exploitation.**<br>Abuse and Neglect – heading amended to include *exploitation* (also throughout the document as applicable)<br><br>**Alternative Provision**<br>Text added to clarify school remains responsible for the pupil's schools place in alternative provision.<br><br>**Information Sharing – new section**<br>Reference and web link added to *DFE Information Sharing Advice for Practitioners Providing safeguarding Services for children, young people, parents and carers* (2024) and *The Seven Golden Rules for Sharing Information (2024).* Strengthened the importance of recording decisions regarding information sharing.<br><br>**Appendix C Specific Safeguarding Issues**<br>• Added a reference to Stopping Domestic Abuse Together (SDAT) and related guidance document in the Domestic Abuse section.<br>• 'Sexual Offences, consent, upskirting' and 'Adult involvement in youth-produced sexual imagery' added to the issues covered list.<br>• Children absent from education section – persistently absent definition revised to *unexplainable and/or persistent absent from education* |

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| | | • 'Adult involvement in youth-produced sexual imagery' section added which includes reference to the government guidance *Sharing nudes and semi-nudes; advice for education settings working with children and young people (2024*)<br><br>**Appendix D**<br>Key local and national safeguarding contact list updated, added to and included in a new table format.<br><br>**Appendix E**<br>New addition – The Seven Golden rules for Information Sharing |

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| 5 | JC | Minor amends only<br><br>**Legal Framework**<br><br>Page 6 - Legislation, statutory and non-statutory guidance documents have been updated reflecting the latest versions. Web links have been updated.<br><br>**Online safety and personal electronic devices**<br><br>Page 16 added – 'Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.' Generative AI: product safety expectations - GOV.UK<br><br>**Alternative Provision**<br><br>Page 21 – added information to clarify and reflect existing alternative provision in relation to the checks and information schools are required to undertake when placing a child in alternative provision.<br><br>**Appendix D – Important Contact Details**<br><br>Page 47 – added link to Lucy Faithful 'Shore Space' which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours. |

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| 6 | JC | • Legislation, statutory and non-statutory guidance documents have been updated reflecting the latest versions.<br>• Updated throughout to reflect Keeping Children Safe in Education (KCSIE) 2026.<br>• Introduced Family Help and community-based early help arrangements, replacing and expanding previous Early Help references.<br>• Strengthened DSL responsibilities, including role in coordinating Family Help and ensuring effective DSL cover during school hours.<br>• Enhanced guidance on multi-agency working, information sharing and local safeguarding partnership arrangements.<br>• Updated procedures for identifying, reporting and responding to safeguarding concerns, including clearer referral pathways and decision-making.<br>• Expanded guidance on online safety, including AI, deepfakes, generative AI, filtering and monitoring responsibilities.<br>• Updated procedures for the making and sharing of nude or semi-nude images, including AI-generated imagery.<br>• Strengthened guidance on child-on-child abuse, including harmful behaviour, online abuse and image-based abuse.<br>• Expanded categories of children potentially at greater risk of harm, including attendance concerns, mental health, young carers, SEND and pupils questioning their gender.<br>• Added guidance on mental health as a safeguarding issue and support for vulnerable pupils.<br>• Strengthened safeguarding requirements for alternative provision, work experience and commissioned services.<br>• Updated safer recruitment, single central record and safeguarding training requirements re volunteers and work experience students.<br>• Updated legal framework to reflect new legislation, including the Data (Use and Access) Act 2025 and Children's Wellbeing and Schools Act 2026.<br>• General updates to improve clarity, reflect current statutory terminology and ensure alignment with current safeguarding guidance.<br>• Added Appendix E: Safeguarding and child protection recording (guidance provided by the Derbyshire Data Protection Hub) |

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## Statement of intent

Denby Free CofE VA Primary School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of Denby Free premises.

We have an experienced and well-trained Safeguarding Team in place which includes Senior Leaders (SLT), an in-school Family Liaison Worker (FLT) and access to a team of local Early Help Workers. All of these professionals are dedicated to the safeguarding and protection of our children and families and work in strong partnership with all local statutory agencies including Children's Services, Health and the Police.

All staff in school receive regular training and fully understand the role they play in safeguarding and protecting children. Underpinning this training is a comprehensive suite of policies and procedures, that all have the fundamental safeguarding priority running through them e.g. Anti- Bullying, Behaviour Regulation, Safer Recruitment, SEND.

At Denby Free, we have high expectations for ALL of our children, summarised in our whole school vision '*Imagine. Believe. Achieve. Shine.'*

*"Let your light shine" Matthew ch 5 v16.*

We aim to provide a safe, happy, caring environment where our children feel confident and learn skills and knowledge that will prepare them for their future life as active members of the community, through our 'Flourish and Shine' values.

Our aspirations are that our children will develop a love of learning and will have fun along the way, loving life at the same time. This will be achieved through a carefully planned and well-designed curriculum which promotes well-being and increases awareness of how to keep safe as core themes.

At Denby Free we will build strong relationships, where children and their families feel safe to talk and we will use age-appropriate child voice techniques/ activities to ensure the children's views are heard.

To meet the wide range of needs of our children, we implement lots of additional strategies to ensure social, emotional and mental health issues are addressed such as Lego Therapy and ELSA. We also signpost parents/carers to a range of well-being and mental health support services.

We have a comprehensive Early Help Offer, rigorous Anti-Bullying and Mental Health and Well- being Policies and Procedures and links with a range of partnerships such as Derbyshire's Road Safety team and NSPCC 'Speak Out, Stay Safe' trainers. All are aimed at keeping children safe, happy and well and helping them to be aware of how to keep themselves safe.

We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing body, the headteacher and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the headteacher and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

**The Senior DSL is Jen Clarke (Headteacher). In the absence of the DSL, child protection matters will be dealt with by the deputy DSLs, Claire Johnson (EY Lead) or Charlotte Hunt (Senior Teacher).**

- The Appointed Teacher for Looked after children/virtual School: Jen Clarke (Headteacher)
- The Appointed Teacher for SEND: Angela Hatton
- The Designated Lead for Anti- Bullying: Claire Johnson
- The Designated Link Governor for Safeguarding: Lyndsay Reast (Chair of Governors)
- The Senior Mental Health and Wellbeing Lead for pupils: Jen Clarke, Claire Johnson, Angela Hatton
- The Designated Link Governor for Anti- Bullying: Lyndsay Reast (Chair of Governors)
- The Designated link Governor for Looked after Children (Child in Care): Lyndsay Reast (Chair of Governors)
- The Nominated Governor for effective filtering and monitoring of IT and school devices: Dawn Roberts

We will ensure that parents/carers and our partner agencies are aware of our child protection/ safeguarding policy by ensuring that it is on Denby Free's website. Summary information is also given during new admission/ transition meetings and included in Denby Free prospectus. Specific areas are directly discussed with individual parents/ carers during parent meetings. Regular support/ information is given by a range of professionals such as Compass Changing Lives.

Denby Free's website will also have information about how parents/children/other agencies can contact the designated safeguarding lead and the deputies and include their availability during out-of-school hours and school holidays.

This 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. Our child-friendly happy, safe and well policy is discussed with all pupils at the start of each school year and throughout, with a summary poster displayed in all classrooms. Our Relationships and Behaviour Policy details our approach to building and maintaining supportive and mutually respectful relationships. Our PSHE/RHE scheme allows regular opportunities for discussions in class regarding safeguarding matters. Child voice is used regularly to seek the pupils' views on a range of issues.

Children, parents/carers, and all staff will be free to talk about any concerns and see Denby Free as a safe place. We have 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.

Our child-friendly safeguarding policy which summarises the overarching policy is well promoted, easily understood and easily accessible. This is used regularly with pupils to ensure they know:

- how to report any concerns
- that their concerns will be taken seriously
- they can safely express their views and give feedback.

## Definitions

The terms **"children"** and **"child"** refer to anyone under the age of 18.

For the purposes of this policy, **"safeguarding and protecting the welfare of children"** is defined as:

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

For the purposes of this policy, **"consent"** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **"sexual harassment"** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.

- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
    - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
    - Sharing unwanted explicit content.
    - Upskirting.
    - Sexualised online bullying.
    - Unwanted sexual comments and messages, including on social media.
    - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **"upskirting"** refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, **"making or sharing of nude or semi-nude images and/or videos"** refers to the creation, possession or sharing of nude or semi-nude images and/or videos involving anyone under the age of 18. This includes consensual and non-consensual sharing, AI-generated content where it depicts a child, and content shared online or offline.

**"Deepfakes"** and **"deepnudes"** refer to digitally manipulated or AI-generated images, audio or videos that falsely depict a person. Where these involve nude or semi-nude images of a child, they will be managed in accordance with Denby Free's procedures for responding to the making or sharing of nude or semi-nude images and/or videos.

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another

person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, 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 the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## 1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

**Legislation**

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.
- Early Years foundation stage statutory framework (2014, Updated 17 July 2026)
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Children's Wellbeing and Schools Act 2026

**Statutory guidance**

- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE 'Working Together to Safeguard Children'
- DfE 'Disqualification under the Childcare Act'
- DfE 'Keeping children safe in education'
- DfE 'Working together to improve school attendance'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'

**Non-statutory guidance**

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Child sexual exploitation'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Information sharing'

- DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Teachers' Standards'
- DfE 'Recruit teachers from overseas'
- DfE 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE 'Restrictive interventions, including the use of reasonable force, in schools'

This policy operates in conjunction with the following statutory policies. This includes child friendly developed safeguarding leaflets, and policies developed by pupils, and all will be made available on the Denby Free website:

- Children Absent from Education Policy
- Child Sexual Exploitation (CSE) Policy (DDSCP) Children at Risk of Exploitation (CRE) (trixonline.co.uk)
- Prevent Duty Policy Protecting children from radicalisation: the prevent duty - GOV.UK (www.gov.uk)
- Child-on-Child Abuse Policy (includes sexual violence and harassment)
- Anti-bullying Policy including Behaviour Policy
- Suspension and Exclusion Policy (includes Attendance Policy)
- Online Safety Policy
- Mobile Phone Policy
- Staff ICT and Electronic Devices Policy (Acceptable Use)
- GDPR/Data Protection
- Records Management Policy (2023) and Data Protection and Retention Schedule (May 2023) guidance document.
- LAC - looked after children (includes SEND)
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy including low-level Concerns
- Recruitment and Selection Policy (including Safer Recruitment)
- Staff Code of Conduct
- A family support offer

## 2. Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Read and understand at least 'Part one' of KCSIE.
- Be aware of Denby Free's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
  - Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of Denby Free's arrangements for community-based early help and targeted family help and understand their role in identifying pupils who may benefit from support before statutory intervention.
  - Be aware of local safeguarding partnership arrangements and understand the referral pathways to CSCS.
  - Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
  - Promote dialogue and understanding, and ensure all pupils feel listened to and understood.
- Empower pupils and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that, including technology-facilitated abuse, can put pupils at risk of harm.
  - Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

In addition, teachers, including the headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The governing body has a duty to:

- Take strategic leadership responsibility for Denby Free's safeguarding arrangements.
- Ensure that Denby Free complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in Denby Free are effective and comply with the law at all times.
- Guarantee that Denby Free contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.

- Confirm that Denby Free's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that all staff read at least Part one of KCSIE.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place that enable children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing body is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Ensure Denby Free has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Have overall strategic responsibility for filtering and monitoring, seek assurance that the filtering and monitoring standards for schools are being met, and that the effectiveness of filtering and monitoring systems is reviewed at least annually, including that appropriate checks are undertaken on all internet-connected devices and a record of those checks is maintained.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Confirm that there are procedures in place to make referrals to the DBS, Teaching Regulation Agency (TRA) and other relevant bodies where required.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Ensure that Denby Free has effective arrangements in place for community-based early help and targeted family help, and that staff understand their role in identifying pupils who may benefit from support before statutory intervention.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.

- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements, the Data (Use and Access) Act 2025 and the local multi-agency safeguarding arrangements.
- Ensure that appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensure that safeguarding requirements are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Ensure that appropriate arrangements are in place to provide effective DSL cover during school hours so that safeguarding concerns can always be responded to promptly.
- Establish robust health and safety and emergency evacuation procedures.

The headteacher has a duty to:

- Ensure that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Ensure that appropriate filtering and monitoring systems are implemented and that staff understand their roles and responsibilities in relation to filtering and monitoring.
- Provide staff with the appropriate policies and information upon induction.
- Ensure that Denby Free practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Ensure that Denby Free carries out all necessary checks on the suitability of people who serve as members and/or on the governing body.
- Ensure that, where Denby Free ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.
- Ensuring that appropriate contact with pupils does not prevent staff members from using reasonable force and other restrictive interventions.

The DSL / DDSLs have a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place,
- Coordinate Denby Free's approach to community-based early help and targeted family help.

- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Refer cases:
    - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically, including through community-based early help, family help and statutory services where appropriate.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school.

This includes:

    - Ensuring that Denby Free knows which pupils have or had a social worker.
    - Understanding the academic progress and attainment of these pupils.
    - Maintaining a culture of high aspirations for these pupils.
    - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
    - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.

- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.

- Ensure each member of staff has access to and understands Denby Free's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing body to ensure Denby Free's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure Denby Free's Child Protection and Safeguarding Policy is available publicly, and parents are aware that Denby Free may make referrals for suspected cases of abuse or neglect, as well as the role Denby Free plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
  - Undergo training and update this training at least every two years.
  - Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, the UK GDPR, and the Data (Use and Access) Act 2025.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

Denby Free will ensure that appropriate arrangements are in place to provide effective DSL cover during school hours. Safeguarding information will be shared securely where necessary to ensure continuity of safeguarding arrangements and timely responses to concerns.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

## 3. Multi-agency working

Denby Free contributes to multi-agency working as part of its statutory duty. Denby Free is aware of and will follow the local safeguarding arrangements. These are set out by the Derby City and Derbyshire Safeguarding Children partnership arrangements https://www.ddscp.org.uk/ Denby Free will be fully engaged, involved, and included in local safeguarding arrangements. Once Denby Free is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. Denby Free will act in accordance with the safeguarding arrangements and will use the local threshold document DDSCP Threshold document

Denby Free will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once Denby Free is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

Denby Free will work collaboratively with families and partner agencies to safeguard and promote pupils' welfare, through community-based early help and targeted family help, and by contributing to coordinated multi-agency plans to support children and families.

Where a child may benefit from family help, Denby Free will work with partner agencies and contribute to multi-agency assessments and plans.

Denby Free will allow CSCS from the host LA and, where appropriate, the placing LA, access to pupils to enable them to undertake or consider assessments under sections 17 or 47 of the Children Act 1989.

Denby Free will also be mindful of the importance of inter-agency working in identifying and preventing CSE, CCE and other forms of extra-familial harm.

Denby Free will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Understanding its role within the local safeguarding arrangements.
- Mutually and constructively challenging other's assumptions in a respectful manner.

Denby Free is also aware of and implements any local learning where appropriate, such as those as outlined in DDSCP Briefing notes and other DDSCP briefing notes located in the multi-agency safeguarding children procedures Documents Library

### Information sharing

Denby Free recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for community-based early help or family help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information

where failure to do so would result in the pupil being placed at risk of harm.

Staff members will be made aware that there may be legal or statutory requirements to share information for safeguarding purposes when requested by relevant agencies.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

Where decisions are made about sharing or withholding information, these will be based on consideration of the risks to the pupil and, where appropriate, the rationale for decisions will be recorded.

Denby Free will follow the **Seven Golden Rules for Information Sharing** (see Appendix E) as good practice principles.

## 4. Support before statutory intervention

Support before statutory intervention means providing help as soon as a problem emerges, at any point in a child's life. This may include support from universal services, community-based early help, or targeted family help, depending on the child's level of need.

Any pupil may benefit from support before statutory intervention; however, staff will be particularly alert to the potential need for community-based early help or family help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have a mental health need.
- Are young carers.
- Are pregnant or are a parent themselves.
- Have exhibited early signs of abusive, violent or harmful behaviours.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Have been repeatedly removed from the classroom.
- Have experienced multiple suspensions.
- Are on a part-time timetable.
- Are at risk of being permanently excluded or are in alternative provision or a pupil referral unit.
- Are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Are at risk of being radicalised into terrorism.
- Have family members in custody or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of honour or faith-based abuse, such as FGM or forced marriage.
- Are privately fostered.

Denby Free will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from community-based early help or family help.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The Designated Safeguarding Lead (DSL) will take the lead where Family Help or community-based early help is appropriate. This includes liaising with relevant agencies and coordinating referrals for Family Help, including arranging or contributing to a multi-agency Family Help assessment where appropriate, in accordance with local safeguarding partnership procedures.

Staff may be required to support other agencies and professionals during a community-based early help or family help assessment and, in some circumstances, may act as the Lead Practitioner, where appropriate and in

accordance with local arrangements. All cases will be reviewed regularly and consideration given to referral to CSCS where the child's circumstances do not improve or where the level of risk increases.

Staff will be familiar with the local thresholds for community-based early help, family help, Section 17 (Children in Need) and Section 47 (Child Protection) and will follow local safeguarding partnership procedures when making referrals. DDSCP Threshold document

## 5. Abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect, exploitation and modern slavery and will understand that children can be at risk of harm inside and outside of Denby Free, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

Denby Free will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. Denby Free will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

Denby Free will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside Denby Free and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of harms outside their families (extra-familial harms).

These harms include, but are not limited to:

- Sexual abuse, including harassment and exploitation.
- Domestic abuse in their own intimate relationships, including physical, sexual, emotional abuse, and stalking.
- Criminal exploitation, including financial exploitation.
- Serious youth violence.
- County lines.
- Radicalisation.

All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues and that risks such as abuse can take place online as well as face to face.

Staff will also understand that child-on-child abuse can occur online and can take the form of:

- Abusive, harassing, misogynistic or misandrist messages.
- The non-consensual making or sharing of nudes or semi-nudes, particularly within group chats.
- Sharing of abusive images and pornography to those who do not wish to receive such content.

Staff will always speak to the DSL or deputy if they are unsure about something in relation to abuse, neglect or exploitation.

## 6. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix C of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

## 7. Child-on-child abuse, including sexual harassment and sexual violence

For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children.

Denby Free has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up". Staff will understand that recognising behaviours early and putting in place timely, evidence-based support can be vital in preventing child-on-child abuse.

All staff will be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Serious physical assault and harm, or threat of harm with a weapon – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- 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.
- The 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 private areas to obtain sexual gratification.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group – this may also include an online element.

Some children may be particularly vulnerable to child-on-child abuse. Denby Free recognises that children with SEND or certain medical or physical health conditions may face additional safeguarding challenges and may be more vulnerable to abuse, bullying and prejudice-based bullying. Staff will recognise that children with disabilities are three times more likely to be abused than their peers and will consider whether additional pastoral or safeguarding support is required.

All pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability. Denby Free will give special consideration to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

The DSL will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to Denby Free's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

Denby Free's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in Denby Free's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

Denby Free recognises that harmful behaviours exist on a continuum and will respond proportionately, considering the age, developmental stage, intent, frequency and seriousness of the behaviour, as well as the needs of all children involved.

## 8. Online safety and technology

Denby Free will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- Content - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, and conspiracy theories.

- Contact - Training will address the risks of harmful online interaction with other users or generative AI applications that simulate this. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.

- Conduct - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as making, sending, or receiving explicit images, including those generated using AI and instances of online bullying.

- Commerce - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams.

Any concerns that pupils or staff may be at risk will be reported promptly to the Anti-Phishing Working Group or through appropriate safeguarding channels.

Denby Free will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with Denby Free's Cyber-security Policy. The appropriateness of Denby Free's filters and monitoring systems will be informed by the 'Filtering and monitoring standards', the 'Cyber security standards for schools and colleges', and the risk assessment required by the Prevent Duty. Denby Free will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. Denby Free will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding Denby Free's approach to online safety can be found in the Online Safety Policy.

## Communicating with parents

As part of the usual communication with parents, Denby Free will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems Denby Free uses to filter and monitor internet use.

Denby Free will also make it clear to parents what their children are being asked to do online for school.

## Reviewing online safety

Denby Free will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Denby Free will also review the effectiveness of its filtering and monitoring systems at least annually. This review will be led by the member of the SLT responsible for filtering and monitoring, with support from the DSL and ICT support where appropriate. The review will include checks that filtering and monitoring systems are operating effectively on all internet-connected devices in relevant locations, and a written record of the review will be maintained.

## Mobile Devices Policy

Denby Free will ensure that pupils do not have access to mobile phones throughout Denby Free day, including during lessons, the time between lessons, breaktimes and lunchtime, except where an exemption applies. Denby Free's approach to mobile phones and smart technology will be set out in the Mobile Devices Policy and will take account of the safeguarding risks associated with pupils having unlimited and unrestricted access to the internet via mobile networks.

## Photography and images

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to Denby Free's Data Protection Policy and Photography and Images Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

## 9. Making or sharing of nudes or semi-nudes

Denby Free will ensure that staff are aware to treat the consensual and non-consensual sharing of nudes and semi-nudes as a safeguarding concern, including where these images are generated by AI.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in Denby Free community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that making or sharing imagery depicting nudes or semi-nudes of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. The DSL will work to support the affected pupils and inform them of the reporting routes to remove a nude or semi-nude that has been shared online or to prevent an image from being shared online.

### Appropriate physical contact with pupils

Denby Free will not operate a 'no contact' policy. Denby Free will also not agree to any request from parents or staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach could leave staff unable to intervene appropriately to safeguard pupils and others.

Physical intervention and reasonable force may be used in limited circumstances and will be managed in line with Denby Free's Restrictive Intervention Policy.

Denby Free will adopt sensible policies and practices which will allow and support staff to make appropriate physical contact with pupils where this is necessary, proportionate and in the best interests of the child. There will be circumstances in which physical contact will be appropriate and will not give rise to concerns about the use of reasonable force or restrictive interventions.

Examples of circumstances where physical contact will generally be appropriate include:

- Providing first aid.
- Guiding or escorting pupils, e.g. holding the hand of a younger pupil when moving around Denby Free or on a school trip, supporting a pupil to move to a space they have chosen to access in order to self-regulate, or assisting pupils to move safely.
- Comforting a distressed pupil.
- Congratulating or praising a pupil, e.g. a handshake or a brief pat on the back.
- Demonstrating how to use a musical instrument.
- Demonstrating exercises or techniques during PE lessons or sports coaching.

When deciding whether physical contact will be appropriate in a particular situation, staff will use their professional judgement and will have regard to:

- This policy and any other relevant policy.
- The context and circumstances, including whether other adults are present.
- The individual pupil's age and level of understanding.
- Any other relevant factors, including, but not limited to:
    - Whether the pupil has SEND or other vulnerabilities.
    - Whether alternative strategies that do not involve physical contact could be used.

## 10. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. Denby Free will provide as much contextual information as possible when making referrals to CSCS.

## 11. Pupils potentially at greater risk of harm

Denby Free recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse, neglect and exploitation. Denby Free will ensure that safeguarding concerns involving these pupils are responded to appropriately, taking account of their individual needs and circumstances.

### Pupils who need social workers

Pupils may need social workers due to abuse, neglect, exploitation or complex family circumstances. Their experiences of adversity and trauma may leave them vulnerable to further harm and educational disadvantage, including barriers to attendance, learning, behaviour and mental health.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

## Children who are absent from education

Denby Free recognises that pupils who are absent from education for prolonged periods and/or on repeated occasions may be at increased risk of abuse, neglect, CCE and CSE, including county lines.

Denby Free will respond to concerns relating to attendance in accordance with its Attendance and Absence Policy and Children Missing Education Policy and will work with CSCS and other agencies where absence gives rise to safeguarding concerns. Denby Free will always work in line with the Derbyshire Educational Psychologists' EBSA approach wherever it is needed and appropriate.

## Home-educated children

Whilst many home educated children receive suitable education, Denby Free recognises that elective home education (EHE) can mean that children are less visible to the services needed to safeguard and support them.

In line with Denby Free Attendance (Pupil Registration) (England) Regulations 2024, Denby Free will inform the LA of all deletions from the admissions register when a pupil is removed from Denby Free roll via the system outlined on the Derby or Derbyshire Welfare webpages.

Where a parent has expressed their intention to remove a pupil from school for EHE, Denby Free, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

## Pupils requiring mental health support

Denby Free recognises that mental health problems can, in some cases, develop into safeguarding concerns. This may include self-harm, signs of an eating disorder, suicidal ideation or suicide, or indicate that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation. Denby Free will maintain a whole-school approach to promoting positive mental health and wellbeing and will make use of appropriate internal and external support services where required.

Only appropriately trained professionals will make a diagnosis of a mental health condition; however, all staff will play an important role in promoting positive mental wellbeing, identifying pupils who may require support, ensuring there is early intervention and the referral concerns where appropriate.

Where support is required, the DSL or deputy will consider whether parents should be informed where doing so will not place the pupil at additional risk. Where safeguarding concerns are linked to a pupil's mental health or emotional wellbeing, the DSL or deputy will liaise with Denby Free's senior mental health lead to ensure the pupil receives coordinated support.

Our school/setting will contact the local School Community Advisor for advice:
CAMHS South

Information and support for mental health and wellbeing

**For children and young people's services, visit Derbyshire Local Offer (if you live in Derbyshire) or Derby Local Offer (if you live in Derby).**

**For adults' services, visit the Joined Up Care Derbyshire website.**

**For suicide prevention and bereavement, visit Joined Up Care Derbyshire – Suicide Prevention.**

If a child is presenting with a risk of serious immediate harm and at risk of taking their own life, we will seek urgent advice from the urgent CAHMS services and/or seek medical intervention from the emergency services.

CAMHS Derbyshire

Denby Free will use the local guidance Mental Health Pathway to help identify a pupil who may be struggling and provide support, including a referral.

Derby-Derbyshire-Mental-Health-Pathway-Guidance-July-2023.pdf

## LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing body will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers. Further details of safeguarding procedures for LAC and PLAC are outlined in Denby Free's LAC Policy.

## Young carers

Denby Free recognises that caring responsibilities may have a significant impact on a pupil's attendance, attainment, behaviour and wellbeing.

Denby Free will seek to identify young carers at the earliest opportunity and will work with pupils, families and external agencies to ensure that appropriate support is provided.

## Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware that:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as peer isolation, bullying, and prejudice-based bullying without outwardly showing any signs.
- Communication barriers may make it more difficult for pupils to recognise, disclose or report abuse.
- Pupils with SEND may not always recognise that what is happening to them is abuse.
- Pupils requiring intimate care or who are more isolated from others may be at increased risk.
- Pupils may be more dependent on adults for care.
- Pupils may have difficulty understanding the difference between fact and fiction online or understanding the consequences of their online behaviour.
-

When responding to safeguarding concerns involving pupils with SEND, the DSL will liaise with the SENCO and, where appropriate, parents and external agencies to ensure that the pupil receives appropriate support.

Denby Free will also consider whether additional pastoral support or communication support is required.

## Pupils with medical conditions

Denby Free recognises that pupils with medical conditions or allergies may require additional safeguarding consideration.

A safeguarding referral will not be made solely because of an incident relating to the management of a pupil's medical condition; however, where concerns indicate that a pupil may be at increased risk of neglect, abuse or exploitation, for example where essential medical information or medication is repeatedly not provided, Denby Free will respond in accordance with its safeguarding procedures.

Pupils will be supported in accordance with Denby Free's Medications Policy.

## Pupils who are lesbian, gay or bisexual

The fact that a pupil is lesbian, gay or bisexual is not, in itself, a risk factor for harm; however, Denby Free recognises that these pupils, or those perceived to be lesbian, gay or bisexual, may be more vulnerable to discriminatory bullying.

Denby Free will take appropriate steps to prevent and respond to bullying and ensure that all pupils feel safe, respected and supported.

## Pupils who are questioning their gender

Denby Free recognises that some pupils may question their gender and that they may have additional vulnerabilities, including mental health or psychosocial needs.

Denby Free will take time to understand the individual circumstances of pupils who are questioning their gender and will respond on a case-by-case basis, acting in the best interests of the pupil and taking account of the safety and wellbeing of all pupils.

Denby Free will not initiate action relating to social transition. Where a request for support is received from a pupil or their parent, Denby Free will respond in accordance with the latest DfE guidance, taking a cautious approach, involving the DSL and, except where doing so would place the pupil at risk of significant harm, working in partnership with parents.

Where a pupil discloses that they are questioning their gender or requests support in relation to social transition, staff will listen carefully and respond sensitively. Staff will not promise confidentiality and will explain that any information shared may need to be discussed with the DSL in order to safeguard and promote the pupil's welfare.

Denby Free will maintain a culture in which bullying is not tolerated and will ensure that pupils who are questioning their gender receive appropriate safeguarding support and are able to raise concerns with trusted members of staff.

The DSL will ensure that appropriate records are maintained of any requests relating to social transition, the factors considered, decisions made, and the reasons for those decisions. Records will be kept securely in accordance with the Data Protection Policy.

## 12. Use of Denby Free premises for non-school activities

Where the governing body hires or rents out school facilities or Denby Free premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. Denby Free will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the governing body provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing body will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing body will also ensure that there are arrangements in place to liaise with Denby Free on these matters where appropriate. The governing body will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

### Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at Denby Free, e.g. AVSSP, charities or companies, will work in collaboration with Denby Free to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

## 13. Alternative provision

Denby Free will remain responsible for a pupil's welfare during their time placed at an alternative provider. When placing a pupil with an alternative provider, Denby Free will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of AP will be aware that pupils in AP will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

Denby Free will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment. This will include written confirmation that the alternative provider will inform Denby Free of any arrangements that may put the pupil at risk.

Denby Free will continue to carry out safeguarding checks and conduct its own due diligence to ensure that the AP is appropriate for meeting each pupil's individual needs.

Denby Free will ensure that the location of pupils placed at AP is always known and will maintain records of the address of the alternative provider and any subcontracted provision or satellite sites the pupil may attend.

AP placement reviews will take place at least half termly to ensure that pupils are regularly attending and the placement continues to be safe and meets their needs.

Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

## 14. Work experience

When a pupil is sent on work experience to our school, Denby Free will ensure that the provider has appropriate safeguarding policies and procedures in place.

Denby Free will not allow someone on the barred list to engage in regulated activity with a pupil on a work experience placement.

When a pupil undertakes work experience at Denby Free, an enhanced DBS check will be obtained if the pupil is over the age of 16.

## 15. Homestay exchange visits

### School-arranged homestays in UK

Where Denby Free is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, Denby Free is the regulated activity provider; therefore, Denby Free will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, Denby Free will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, Denby Free will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

### School-arranged homestays abroad

Denby Free will liaise with partner schools to discuss and agree the arrangements in place for the visit. Denby Free will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. Denby Free will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

### Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement and Denby Free is not the regulated activity provider.

## Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where Denby Free becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

## 16. Reporting and responding to concerns about pupils

### Reporting concerns

Staff members will maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff will always act in the best interests of a pupil when they are concerned about their welfare.

Staff will be aware that data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If there is any doubt about sharing information, staff will speak to the DSL or deputy. Fears about sharing information will not stand in the way of the need to safeguard and promote the welfare of children.

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSL.

Staff will not assume that a colleague or other professional will take action and share information that might be critical in keeping pupils safe. Staff will be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSL with the matter. If, in exceptional circumstances, neither the DSL nor deputy is available, this will not delay action being taken. Staff will consider speaking to a member of the SLT and/or take advice from LA children's social care. In these circumstances, any action taken will be shared with the DSL or deputy as soon as possible.

### Determining the appropriate response

Following a report, the DSL or deputy DSL will consider the information provided, the pupil's level of need and any known history before determining the most appropriate course of action.

This may include:

- Managing any support for the pupil internally via Denby Free's pastoral support processes, including considering where doing so does not place the pupil at additional risk, and whether the DSL or deputy should inform parents to further support the pupil's wellbeing.
- Undertaking a family help assessment.
- Making a referral to statutory services, e.g. as the pupil could be in need, is in need or is suffering, or likely to suffer harm.

Where a community-based early help or family help assessment is undertaken, the DSL will normally coordinate Denby Free's involvement with partner agencies. Staff will contribute to assessments, planning and reviews as required. Denby Free will keep all cases under regular review and will request further intervention or make a referral to CSCS where the pupil's circumstances do not improve or where risks increase.

Staff members will be advised to read the DfE's guidance on information sharing to support them in the event that they need to make a decision about sharing information.

## Referrals and multi-agency working

Where a pupil is suffering, or is likely to suffer, significant harm, or is in immediate danger, a referral will be made immediately to CSCS and/or the police, as appropriate. Referrals will follow the local referral process. Where a criminal offence is suspected, including incidents of sexual violence, the police will be notified without delay.

The reporting and referral process outlined in the Reporting Safeguarding Concerns Process Flowchart will be followed accordingly (Appendix B) 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 Social Care

The DSL will be familiar with local safeguarding partnership referral arrangements and will provide advice and support to staff where required. Information will be shared with external agencies in accordance with data protection legislation and Denby Free's confidentiality procedures.

Where Denby Free makes a referral, the DSL will expect to receive confirmation of the LA social worker's decision within one working day. Where this information is not forthcoming, the DSL will follow this up.

If the LA social worker decides to carry out a statutory assessment, the DSL or deputy will do everything they can to support this process, with assistance from relevant staff members as required.

If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil. The DDSCP Escalation and professional dispute procedure will be followed when deemed appropriate.

The DSL will maintain effective liaison with CSCS, the police and other relevant agencies to support the pupil's welfare and ensure that Denby Free does not compromise any ongoing investigations.

Denby Free will not wait for the outcome of a statutory or criminal investigation before taking appropriate action to safeguard and support the pupil. Where statutory intervention is not required, Denby Free will continue to consider appropriate support through community-based early help, family help, pastoral support or other suitable interventions.

## Supporting pupils and recording concerns

Where safeguarding concerns arise, Denby Free will ensure that the pupil's wishes and feelings are taken into account and that pupils are given opportunities to express their views. Staff will respond calmly and supportively, ensuring pupils feel listened to, taken seriously and supported.

Discussions with parents will take place where appropriate and where doing so will not place the pupil or others at increased risk of harm. Denby Free will work with parents and partner agencies, where appropriate, to support the pupil's safety and wellbeing.

All safeguarding concerns, discussions, decisions and the reasons for those decisions will be recorded promptly by the DSL or deputy DSL and stored securely in accordance with Denby Free's record management procedures.

## 17. Concerns about school safeguarding practices

Any concerns regarding the safeguarding practices at Denby Free will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as speaking with the governing body, the NSPCC whistleblowing helpline (0800 028 0285) or the LADO at DCC.

## 18. Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, trainee teachers, volunteers and contractors will be managed in line with Allegations Against Staff (including low level concerns) Policy, a copy of which will be provided to, and understood by, all staff. Denby Free will ensure all allegations against staff, including those who are not employees of Denby Free, are dealt with appropriately and that Denby Free liaises with the relevant parties.

When managing allegations against staff, Denby Free will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations against staff (including low level concerns) policy. Allegations that meet the harms threshold include instances where staff have:

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

Low-level concerns will be handled in line with the Allegations against staff (including low level concerns) policy.

## 19. Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within Denby Free and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent programme.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, Denby Free will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual

harassment is progressing through the criminal justice system, Denby Free will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, Denby Free will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving Denby Free, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

## 20. Safer recruitment

Denby Free's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members and volunteers engaged in regulated activity.

Denby Free will determine whether a role constitutes regulated activity in accordance with current legislation and DfE guidance, including the DBS Workforce Guides. This will include staff, volunteers and third-party personnel engaged in regulated activity. Where a role constitutes regulated activity, an enhanced DBS certificate with barred list information will be obtained before the individual begins work.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

Denby Free will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

Denby Free will also ensure that trainee teachers and other individuals undertaking placements are subject to the appropriate safeguarding and recruitment checks in accordance with KCSIE and the Safer Recruitment Policy.

### Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Annual Staff Disqualification Declaration Form confirming that they are not disqualified from working in a school setting. A disqualified person will not be permitted to continue working at Denby Free, unless they apply for and are granted a waiver from Ofsted. Denby Free will provide support with this process.

### Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to pupils or placing pupils at risk.

### Referral to the DBS

Denby Free will refer an individual to the DBS where the legal duty to do so is met, including where they have harmed, or pose a risk of harm to, a pupil and have been removed from regulated activity, or would have been removed had they not resigned, retired or otherwise left their role.

## 21. Single central record (SCR)

Denby Free keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at Denby Free.

The MAT holds a SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, Denby Free will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks Denby Free would perform on any individual working in Denby Free or who will be providing education on Denby Free's behalf, including through online delivery) and the date that confirmation was received.

For volunteers engaged in regulated activity, Denby Free will record on the SCR the same pre-appointment checks required for individuals undertaking regulated activity, including an enhanced DBS certificate with children's barred list information. Where checks are undertaken for volunteers who are not engaged in regulated activity, these will also be recorded on the SCR. Where a risk assessment is undertaken to determine whether a volunteer who is not engaged in regulated activity should be subject to an enhanced DBS check, this will also be recorded. Written confirmation that supply agencies have completed all relevant checks will also be included.

Denby Free is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at Denby Free.

## 22. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE).
- The Behaviour Policy.
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.

- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE, CSE, modern slavery and trafficking, including where a referral to National Referral Mechanism may be appropriate.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in Denby Free.

The DSL and deputy DSLs will undergo child protection and safeguarding training and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing community-based early help, family help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

## 23. Monitoring and review

This policy is reviewed at least annually by the DSL and the headteacher. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. **The next scheduled review date for this policy is July 2027, but will be updated if and when needed.**

This school will also undertake an annual school S175 safeguarding audit. This will be completed by the senior DSL/Head teacher and will be used to ensure there is a robust approach to child protection and safeguarding in this school. This will be shared with the governing body and a copy sent to Derbyshire Children's Services. Any parent/carer or interested party can request to see this.

# Appendices

## Appendix A Acronyms

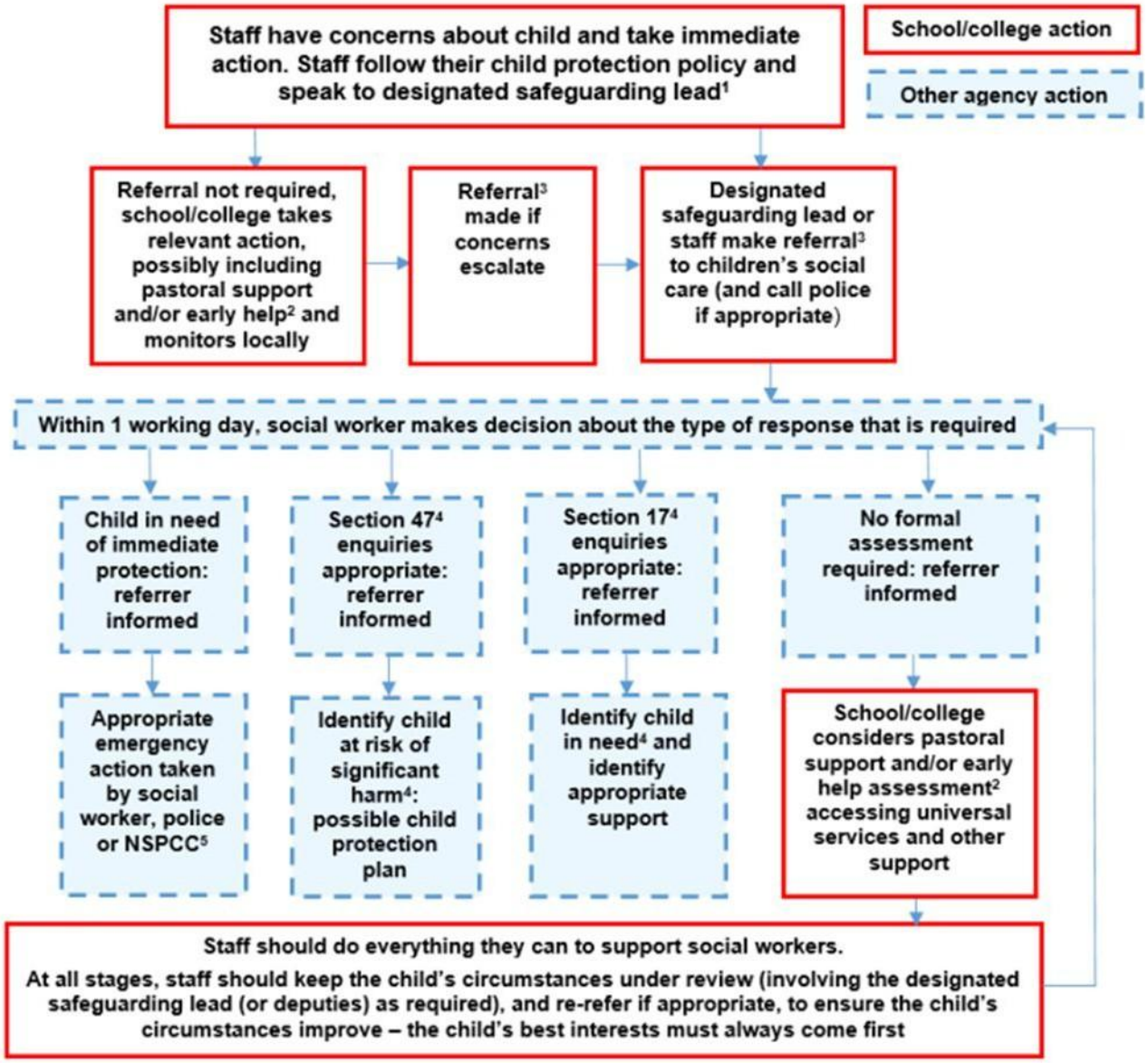
This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

| Acronym | Long form | Description |
|---|---|---|
| CCE | Child criminal exploitation | A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| CSCS | Children's social care services | The branch of the local authority that deals with children's social care. |
| CSE | Child sexual exploitation | A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. |
| DBS | Disclosure and barring service | The service that performs the statutory check of criminal records for anyone working or volunteering in a school. |
| DfE | Department for Education | The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England. |
| DPO | Data protection officer | The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act. |
| DSL | Designated safeguarding lead | A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout Denby Free. |
| EEA | European Economic Area | The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland). |
| EHC plan | Education, health and care plan | A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil. |
| EHA | Early Help Assessment | An early help assessment is where a lead practitioner (such as a GP, family support worker, family resource worker, school lead, school |

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|---|---|---|
| | | nurse, teacher, health visitor, and/or special educational needs co-ordinator) makes an assessment of the child's needs. |
| ESFA | Education and Skills Funding Agency | An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults. |
| FGM | Female genital mutilation | All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. |
| UK GDPR | UK General Data Protection Regulation | Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent. |
| HBA | 'Honour-based' abuse | So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community. |
| HMCTS | HM Courts and Tribunals Service | HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice. |
| IICSA | Independent Inquiry into Child Sexual Abuse | The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours. |
| KCSIE | Keeping children safe in education | Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children. |
| LA | Local authority | A local government agency responsible for the provision of a range of services in a specified local area, including education. |
| LAC | Looked-after children | Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours. |
| LGBTQ+ | Lesbian, gay, bisexual, transgender and queer plus | Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities. |
| NPCC | The National Police Chiefs' Council | The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers. |

| | | |
|---|---|---|
| PLAC | Previously looked-after children | Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers. |
| PSHE | Personal, social and health education | A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships. |
| RSHE | Relationships, sex and health education | A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships. |
| SCR | Single central record | A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend Denby Free in a non-visitor capacity. |
| SENCO | Special educational needs coordinator | A statutory role within all schools maintaining oversight and coordinating the implementation of Denby Free's special educational needs policy and provision of education to pupils with special educational needs. |
| SLT | Senior leadership team | Staff members who have been delegated leadership responsibilities in a school. |
| TRA | Teaching Regulation Agency | An executive agency of the DfE with responsibility for the regulation of the teaching profession. |
| VSH | Virtual school head | Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker. |

## Appendix B: Safeguarding referral flowchart



Appendix C

## Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

Denby Free recognises that many of the safeguarding issues described in this appendix may be facilitated by technology or occur wholly online. Staff will remain alert to online indicators of abuse, exploitation and harm and respond in accordance with this policy.

Here are the issues covered:


1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cyber-crime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage
12. Radicalisation
13. Pupils with family members in prison
14. Pupils required to give evidence in court
15. Mental health
16. Serious violence
17. Adult involvement in the making or sharing of nude or semi-nude images


### Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **"domestic abuse"** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. **"Abusive behaviour"** includes

physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **"Personally connected"** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Denby Free will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

## Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

## Children absent from education

A child who is absent from education can be a vital warning sign of abuse, neglect, exploitation, mental health concerns and other safeguarding issues, including CCE and CSE. Denby Free will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from Denby Free, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy. Denby Free will inform the LA of any pupil who fails to attend regularly or has been absent without Denby Free's permission for a continuous period of 10 school days or more.

Denby Free will follow the DfE's guidance on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

## Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by Denby Free, or when Denby Free has been notified that the pupil will first be attending. Denby Free will notify the LA within 5 days of when a pupil's name is added to the admissions register.

Denby Free will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend Denby Free on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies Denby Free that their child will live at a different address, Denby Free will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies Denby Free that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, Denby Free will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, Denby Free will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of Denby Free by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend Denby Free and no longer live within a reasonable distance of the premises.
- Have been certified by Denby Free's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and Denby Free does not reasonably believe they will be returning to Denby Free at the end of that period.
- Have been permanently excluded.
-

Denby Free will also remove a pupil from the admissions register where Denby Free and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, Denby Free will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

Denby Free will work with the LA to establish methods of making returns for pupils back into Denby Free. Denby Free will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. Denby Free will also highlight any other necessary contextual information, including safeguarding concerns.

## Child abduction and community safety incidents

For the purposes of this policy, **"child abduction"** is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of Denby Free that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

## Child criminal exploitation (CCE)

For the purposes of this policy, **"child criminal exploitation"** is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

Denby Free will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. Denby Free will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

## County lines

For the purposes of this policy, **"county lines"** refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

## Cyber-crime

For the purposes of this policy, **"cyber-crime"** is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

## Child sexual exploitation (CSE)

For the purposes of this policy, **"child sexual exploitation"** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Denby Free will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. Denby Free will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. Denby Free will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with Denby Free's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. Denby Free will cooperate as needed.

## Modern slavery

For the purposes of this policy, **"modern slavery"** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

## FGM

For the purposes of this policy, **"FGM"** is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. Denby Free's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called **"'honour-based' abuse (HBA)"**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

### Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

**Virginity testing** - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

**Hymenoplasty** - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental

health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. Denby Free will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

Denby Free will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

## Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed

if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, Denby Free will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – Denby Free will use existing national and local protocols for multi-agency liaison with police and CSCS.

Denby Free will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

Denby Free will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

Denby Free will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

Denby Free will take a whole school approach towards educating on forced marriage in Denby Free curriculum and environment – in particular, Denby Free's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated about the issues surrounding forced marriage and the signs to look out for.

## Radicalisation

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **"extremism"** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **"terrorism"** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of Denby Free's wider safeguarding duties. Denby Free will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. Denby Free will work with local safeguarding arrangements as appropriate.

Denby Free will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, Denby Free will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless Denby Free has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

## The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **"the Prevent duty"**. The Prevent duty will form part of Denby Free's wider safeguarding obligations.

Denby Free's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

## Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?]' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

### Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet '[Going to Court]' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – Denby Free will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

Denby Free will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, Denby Free's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

## Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been suspended, spent time in AP or permanently excluded from school.
- Having experienced child maltreatment.
- Having used drugs or alcohol in early adolescence.
- Having previously been a victim or previously perpetrated violence.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Denby Free will cooperate with safeguarding partners, CSCS, the police and other relevant agencies where appropriate.

## Adult involvement in the making or sharing of nude or semi-nude images

Denby Free's response to the making or sharing of nude or semi-nude images will follow the guidance in KCSIE.

## Sexually motivated incidents

Denby Free will remain aware that not all instances involving the making or sharing of nude or semi-nude images will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

## Financially motivated incidents

Financially motivated incidents involving the making or sharing of nude or semi-nude images involving adults may also be called **"sextortion"**, where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money. In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

## Appendix D

Key Local Safeguarding Contacts

### Other Key Local Safeguarding Contacts

| | Derby | Derbyshire |
|---|---|---|
| **Early/Family Help and Advice** | • Derby City Family Hubs and Early Help<br>• Early Help Advisors, see Safeguarding Children Procedures Contacts, advice and further information | • Family Help Service<br>• For advice contact Starting Point Consultation and Advice Service for Professionals via 01629 535353 |
| **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***<br>**Urgent:** 01332 641172 or out of hours via Careline 01332 956606<br>**Non urgent:** Derby Children's Social Care Online Referral system | ***Starting Point***<br>**Urgent:** Call Derbyshire 01629 533 190<br>**Non urgent:**<br>Starting Point online |
| **Local Authority Designated Officer (LADO)** | Derby LADO advice form<br>Derby and Derbyshire LADO referral form<br>**Email:** CPMduty@derby.gov.uk | Derby and Derbyshire LADO referral form<br>**Email:**<br>professional.allegations@derbyshire.gov.uk |
| **Derbyshire Police** | • 999 for emergencies or 101 for non-emergencies<br>• Mandatory reporting of Female Genital Mutilation (FGM) via 101<br>• School/College Police Safer neighbourhood team or link officer Also see *When to call the police – guidance for schools and colleges* | |
| **Prevent (radicalisation and extremism)** | • For advice contact the Local Authority Prevent Team:<br>Derbyshire - 01629 535646 or prevent@derbyshire.gov.uk<br>Derby - Prevent@derby.gov.uk<br>• 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)<br>• Reporting extremism concerns about an adult working in an education setting submit the details at report extremism in education | |

| | Derby | Derbyshire |
|---|---|---|
| **Children absent from education** | • Derby Education Welfare Service (EWS)<br>• Elective home education (EHE)<br>• Children missing education (CME) | • Derbyshire Education Welfare Services<br>• Elective home education (EHE)<br>• Children missing education (CME)<br>• See Children missing from education for further information on guidance, policies and procedures relating to school age children missing from education |
| **Virtual School for Looked After Children** | • Virtual School Head - 07812 301044 or graeme.ferguson@derby.gov.uk<br>• Specialist Education Support Officer for LAC | Helen Moxon, Virtual School Headteacher 01629 538028 virtualschool@derbyshire.gov.uk<br>• Specialist Education Support Officer for LAC or other role |
| **Domestic Abuse** | • Safer Derby City<br>• Derbyshire constabulary - information and advice about domestic abuse webpages | • Safer Derbyshire domestic abuse webpage<br>• 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 | See relevant District council website |

**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:<br>• Text 88858<br>• 0808 800 5000<br>• 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:<br>• 0800 136 663<br>• 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:<br>• 0800 028 0285<br>• help@nspcc.org.uk |

| Organisation | Description and contact details |
|---|---|
| **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:<br>• 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<br>• CEOP – to report online sexual abuse or the way someone has been communicating online<br>• 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.<br>• 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.<br>• Lucy Faithfull Foundation's Shore space offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours. |

## Appendix E

### 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 Denby Free is committed to ensuring practices at Denby Free are reflective of IICSA recommendations.

**Statement of Intent**

Denby Free 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 Record Retention Policy.

**How to record safeguarding/child protection concerns.**

Given these very long retention periods, Denby Free 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 Denby Free, its staff, pupils or systems. Staff will be trained in good practice.

Our records will:

- Be written by Denby Free'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, e.g. 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**

Denby Free uses an electronic safeguarding platform 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 Denby Free's website.

Any related physical first-hand notes will be accurately transcribed into the electronic platform. Diagrams will be scanned in. Any recordings will also be securely retained.

**The transfer of pupil safeguarding records**

Keeping Children Safe in Education states that "where children leave Denby Free 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 Denby Free, 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 Denby Free 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 Denby Free'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'.

Denby Free 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 Denby Free 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**
Denby Free retains staff records in line with Denby Free 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 Denby Free 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.

## Appendix F

### The Seven Golden Rules for Sharing 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 framework1 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 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 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, 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), 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.**

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* DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers (2024)