Rougemont School

Safeguarding Policy 2026-2027

Policy Title	
Safeguarding Policy	
Date Approved	**Date To Be Reviewed**
Summer 2026	Summer 2027
SLT Lead(s)	Sarah Howell-Jones
Governor Lead(s)	Wendy Williams

Governance and Accountability

The Governing Body retains ultimate responsibility for ensuring that this policy is implemented effectively. Senior Leadership is responsible for the day-to-day operation of the policy, ensuring that appropriate systems, training and monitoring are in place.

This policy is made available to parents and carers in accordance with statutory requirements relating to the provision of information.

SAFEGUARDING (AND CHILD PROTECTION) POLICY
Academic Year 2026/27

Designated Safeguarding Person:	Mrs Sarah Howell-Jones
Deputy Designated Safeguarding Persons:	Mr Andrew Bevan Mr Huw Singer
The Head:	Mrs Lisa Pritchard
Chair of Governors	Dr Stephen Anthony
Designated Safeguarding Governor:	Mrs Wendy Williams (Mrs Eleanor Farncombe Deputy / 'Shadow' Safeguarding Governor)

Contents

1.0 PURPOSE OF THE POLICY....3

2.0 PRACTICAL ADVICE: SIGNS AND SYMPTOMS OF ABUSE AND NEGLECT....12

3.0 REPORTING PROCEDURES....15

4.0 DEALING WITH DISCLOSURES....17

5.0 SAFEGUARDING RESPONSIBILITIES IN SPECIFIC CIRCUMSTANCES....26

6.0 CONFIDENTIALITY, SHARING INFORMATION AND RECORD KEEPING....38

7.0 SAFER RECRUITMENT PROCEDURES....39

8.0 SUPPORT....39

9.0 GOOD PRACTICE GUIDE....41

10.0 ABUSE OF TRUST....41

Appendix A: MyConcern....43

Appendix B: Key personnel – Safeguarding team details and contacts....44

Appendix C: Responding to a CP disclosure or concern....50

Appendix D: Child on Child behaviours including Abuse....51

Appendix E: Procedures regarding pupil disclosure of Child-on-Child Harmful Sexual Behaviour....52

Appendix F: Brook traffic light tool for identifying sexual behaviours....53

Appendix G: Protecting your setting's images from AI manipulation and abuse: Guidance for education settings and organisations working with children and young people 57

Appendix H: Safeguarding Adolescents from Exploitation (SAFE). Child Exploitation Screening Tool....58

Appendix I: Intimate Care Guidance....65

Appendix J: Professional Allegations & Concerns Flow Diagram....67

Appendix K: Safeguarding of Sixth Form Students Aged 18 and Over Appendix Statement October 2026…69
Appendix L: Safeguarding Concerns Involving Sub-Contracted Members of Staff……..…71

1.0 PURPOSE OF THE POLICY

1.0.1 The policy applies to all staff (teaching and non-teaching), visitors and governors and can be found on the School's website and a paper copy will be provided, on request, at reception. The policy highlights our core safeguarding principles as:

a) Safeguarding children is everybody's responsibility. The School's responsibility to safeguard and promote the welfare of all children in the School is of paramount importance regardless of age, gender, ability, culture, race, language, religion or sexual identity.
b) The School's statutory responsibility to ensure reasonable measures are taken to minimise risks of harm to children's welfare; appropriate actions are taken to address concerns about the welfare of a child or children, working with agreed local policies and procedures in full partnership with other local agencies.
c) Representatives of the whole-school community of pupils, parents, staff and governors will be involved in policy development and review.
d) This policy will be reviewed at least annually, unless an incident or new legislation or guidance suggests the need for an interim review.
e) To provide all staff with the necessary information and training to enable them to meet their Safeguarding and Child Protection (CP) responsibilities, including early help interventions.
f) All staff have an equal responsibility to act on any concern or disclosure that may suggest a child is at risk of harm.
g) Pupils and staff involved in Safeguarding and CP issues will receive appropriate support.
h) Safer children make more successful learners.
i) A zero-tolerance approach to **bullying**, sexual harassment and violence

1.0.2 Throughout this document, the words 'child' and 'children' include everyone under the age of 18.

Key pages at a glance:	
Definitions, signs and symptoms of abuse:	p9.
Procedures for reporting concerns**:**	p11, Appendix A (p33.) and C (p40.)
Dealing with and reporting disclosures:	p13, Appendix C(p40.), D(p41.) and E (p42.)
Names and points of contact, including early help services:	Appendix B (p34.)
Brook Traffic Light tool for Harmful Sexual Behaviour:	Appendix F(p43.)

1.1 Background and Context

1.1.1 Safety and welfare within the context of an enriching and challenging education for pupils at Rougemont School is our highest priority. **Safeguarding and promoting the welfare of children is everyone's responsibility**. We take a whole school approach to safeguarding and ensure that safeguarding and child protection are at the forefront of all aspects of process and policy development. At all times, we maintain an 'it could happen here' approach to all aspects of safeguarding.

1.1.2 Our role is to know everyone as an individual and to provide a secure and caring environment, so that every pupil may learn most effectively in safety. Where there is a safeguarding concern, school staff (alongside the Safeguarding team) will ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Our systems of support are in place, and they are well-promoted, easily understood and easily accessible for children to confidently report concerns, knowing that they will be treated seriously, and knowing they can safely express their views and give feedback.

1.1.3 As well as safeguarding children at risk of harm, we recognise our duty to children in need of **early help**, so that we may play our part in providing support as soon as a problem emerges. We also recognise the importance of considering appropriate action when we have concerns about a child, as opposed to a child being in immediate danger. All school staff should be aware that safeguarding incidents can happen at any time, anywhere and are required to be alert to any possible concerns. Where this document refers to 'staff' it should be taken that this is anybody who is employed by the School or who works in the school, for example peripatetic teachers, invigilators, agency members of staff, premises staff, contracted staff (eg. cleaning), volunteers, university students.

1.1.4 The School will maintain an ethos where children feel secure, are encouraged to talk and are listened to; we ensure children know that there are adults in the School whom they can approach if they are worried or in difficulty; included in the curriculum are activities and opportunities for Personal Health and Social Economic Education (PSHE) which equip children with the skills they need to stay safe from abuse and to know to whom to turn for help; we include in the curriculum, material which will help children develop realistic attitudes to the responsibilities of adult life.

1.1.5 We support all children who have been abused or who are at risk of abuse and ensure that safeguarding issues are explored through the education of pupils and appropriate communication with staff and parents. We are alert to the signs of abuse and neglect and follow our procedures herein to ensure that all our children are safeguarded.

1.1.6 We recognise the principles enshrined in the United Nations Convention on the Rights of the Child (UNCRC) and the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

The School recognises and acts upon the legal duties set out in the above statutes, regulations and guidance, to protect its pupils (and staff) from harm, and to cooperate with other agencies in carrying out those duties and responding to safeguarding concerns.

1.2 **Statutory Framework**.

Key Statutory Guidance: Wales Safeguarding Procedures and Keeping Learners Safe reference all the key government acts.

Ke*eping Learner*s Safe (gov.wales)

https://safeguarding.wales/

This Policy is implemented in line with locally agreed inter-agency procedures, specifically those of the Southeast Wales Safeguarding Children's Board (SEWSCB), which include local criteria for action and assessment protocols.

This Policy is addressed to all members of staff and volunteers at the School (temporary and permanent). Adherence to this Policy is mandatory for all staff and volunteers and its use is not subject to discretion. This Policy applies whenever staff or volunteers are working with pupils, including where this is away from the School, for example at another institution, on school visits and trips, as well as sporting and cultural activities.

1.3 Safeguarding and promoting the welfare of children – Creating a Culture of Safeguarding

1.3.1

Safeguarding *is the protection of children from abuse and neglect, preventing impairment of their health or development and ensuring that they receive safe and effective care to enable them to have optimum life chances.*

CHILD AT RISK – see section 130 part 7 of the Social Services and Well-being Act *is a part of safeguarding and promoting welfare. This refers to the activity which is undertaken to protect specific children who are suffering -because of abuse or neglect.*

1.3.2 **Roles and Responsibilities**

Everyone who encounters children and their families has a responsibility and role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children to prevent issues from escalating.

Rougemont School will:

● Ensure it has a designated senior person (DSP) and deputies for child protection, who have undertaken the appropriate Social Care Framework Level C training.

● Ensure that all members of staff, including permanent, part time and adult volunteers, know:

- that they have an individual responsibility for referring child protection concerns using the agreed procedures
- the name, contact details and the role of the designated senior person (DSP), the deputy DSPs and designated governor responsible for safeguarding;
- that they have an individual responsibility for reporting children at risk and child protection concerns to social services, or to the police, within the timescales agreed with the Regional Safeguarding Board (by following the school's agreed procedures)-
- how to take forward those concerns where the DSP is unavailable
- how to support a child who discloses abuse

● Ensure that all members of staff are aware of the need to be alert to signs of abuse and neglect and know how to respond to a child who may disclose abuse or neglect.

● Provide training for all staff so that they:

- understand their personal responsibility
- know the agreed local procedures and their duty to report
- are aware of the need to be vigilant in identifying cases of abuse and neglect
- how to support a child who discloses abuse or neglect
- understand the role online behaviours may have in each of the above

● Designate a governor for safeguarding who will oversee the school's child protection policy and practice

1.3.3 **Staff**

Where this document refers to 'staff' it should be taken that this is anybody who is employed by the School or who works in the school, for example peripatetic teachers, invigilators, agency members of staff, premises staff, contracted staff (eg. catering, cleaning), volunteers, university students.

1.3.4 **Governing Body**

1.3.4.1 The governing body will ensure that there are effective safeguarding policies and procedures in place to safeguard and promote the welfare of children and will monitor their compliance with statutory guidance (including LA guidance).

1.3.4.2 The governing body will identify a governor as the Designated Governor for safeguarding and a 'shadow/deputy' as part of succession planning procedures and all members of the governing body will undertake relevant safeguarding training. The Governing Body will have 'Safeguarding' as a standing agenda item.

1.3.4.3 The Designated Governor for safeguarding will:

a) Be the lead governor on safeguarding and child protection matters;
b) Ensure they are trained to Group B training level and keep this up to date, every two years.
c) Ensure the safeguarding policies and procedures are reviewed at least once annually and how the duties have been discharged;
d) Maintain contact with the statutory authorities in relation to Child Protection staff disciplinary cases - following procedures within Disciplinary and Dismissal procedures for school staff (002/2020).

1.3.5 **Head Teacher (The Head)**

1.3.5.1 The Head will ensure that:

a) all staff can access sufficient resources and time to discharge their responsibilities relating to safeguarding, including training, inter-agency meetings and the provision of early help and assessment of children;
b) all staff understand the policies and procedures for safeguarding children and feel able to raise concerns about poor or unsafe practice (see whistleblowing and school staff are also aware of the NSPCC whistleblowing helpline 08000280285 help@nspcc.org.uk);
c) all staff as part of their induction, all staff are given a written statement about the School's policies and procedures, as well as the name and contact details of the Designated Senior Person (DSP);
d) The DSP is a member of the Senior Leadership Team (SLT) and is given sufficient time and resources to carry out the role effectively;
e) The School's record of employment includes identity checks, qualification checks, registration with the Education Workforce Council EWC (Wales) for teaching and learning

support posts, checks of the right to work in the UK, a DBS enhanced disclosure and two references.

13.5.2 The Head will also:

I. take overall responsibility for the School's CP practice, policy, and procedures and complete Social Care Framework Level C training on a biannual basis; and
II. Follow Section 5 of Wales Safeguarding procedures when handling allegations of abuse against teachers and other staff and follow procedures within Disciplinary and Dismissal procedures for school staff (002/2020) and Safeguarding Children in Education: handling allegations of abuse against teachers and other staff (009/2014)

1.3.6 **Designated Senior Person (DSP)**

1.3.6.1 The DSP will:

a) Be trained to SC Framework level C
b) know how to recognise and identify the signs of abuse and neglect;
c) know when it is appropriate to make a report to relevant investigating agencies, including the Local Safeguarding Children Board's (LSCB) Children's Services team;
d) provide training, advice and support to staff, including refresher, induction training and weekly 'safeguarding shout outs';
e) provide regular updates at staff meetings as appropriate;
f) keep online records of the dates of the training, details of the provider and a record of staff attendance;
g) keep The Head informed of all CP issues and work with other agencies as necessary;
h) ensure that parents and carers see copies of the Safeguarding (and Child Protection) policy and will take steps to inform new parents (at, for example, a new parent information evening or within a welcome letter) that we have a duty to share information with other agencies and reports may be made as a child's safety is paramount;
i) keep confidential, detailed, accurate and secure written records of children where there are safeguarding concerns. These records will include:
    i) Chronology of concerns
    ii) Concern reports and action taken feedback
    iii) Reports made to agencies
    iv) Requests for consent and the outcome
    v) Meetings/phone calls/emails
j) ensure that when a child leaves the School, their CP file is copied and transferred securely, but separately, from the main pupil file to the child's new establishment;
k) liaise with the Designated Governor and when appropriate, their 'shadow' so that the DSP and Designated Governor can report to the governing body on safeguarding issues (not including specific safeguarding cases);
l) ensure staff and volunteers have access to and understand this policy;
m) review this policy at least annually and will work with the pupils, The Head, Designated Governor and Safeguarding Committee for this purpose;

n) undergo appropriate training, including inter-agency training if provided by the LA, and keep up-to-date with legislation;
o) together with the Head, monitor the effectiveness of other policies relevant to safeguarding, listed below:
Inclusion Policy
Attendance Policy
Data Protection Policy
Fire Policy
First Aid Policy
Health and Safety Policy
Pupils' Use of ICT, Mobile Phones and Electronic Devices Policy
Medication Policy
Missing Pupil Policy
Anti-Bullying Policy
Behaviour and Discipline of Pupils: Governors Statement and Policy
Safer Recruitment Policy
p) Staff Code of Conduct and whistleblowing policy located via the desktop home screen in the Policies Manual
q) collaborate, when possible, with local area DSPs to share good practice;
r) display posters where relevant informing pupils and staff of safeguarding procedures;
s) collaborate with The Head and members of staff with responsibilities for Personal Health and Social Education to ensure that children are educated with regards to Safeguarding matters and that the PHSE programme is flexible to respond to the needs of the school community and that parents receive appropriate information;
t) contact a child's social worker, if that child is absent for 2 days or more and is on the Child Protection Register.
u) Review safeguarding concerns arising from the remote monitoring of online behaviours via Impero and alerts from Computer World Wales.

1.3.6.2 The Deputy DSPs will:

a) Be trained to SC Framework level C
b) Assist the DSP in all aspects of their role;
c) Deputise for the DSP as required;
d) Meet with the safeguarding team each week;
e) Work with individual children / parents in safeguarding matters as delegated by the DSP;
f) Be trained in advanced safeguarding training including Safer Recruitment;
g) Support the DSP in ensuring that safeguarding is appropriately built into the PSHE programme as directed by the DSP;
h) Support the DSP in ensuring School Councils and other elements of Pupil Voice have Safeguarding as a regular agenda item

1.3.7 **Staff**

1.3.7.1 *Everybody working in education should safeguard children's well-being.* We have a responsibility to provide a safe environment and to identify children who may need extra help or who are suffering, or likely to suffer significant harm. All staff, teaching and non-teaching, then have a responsibility to take appropriate action. All staff, teaching and non-teaching, must:

a) be aware of the policies, procedures and systems which support safeguarding in the School and as such are advised to download the app for Wales Safeguarding Procedures www.safeguarding.wales
b) be aware of who the DSP is and how to contact them in school (Appendix B);
c) be aware of who the Deputy DSPs are and how to contact them in school (Appendix B);
d) be aware of who the Designated Governor and their 'shadow' is and how to contact them (Appendix B);
e) be aware of the signs of abuse and neglect and how this may affect a child in school;
f) always act in the interests of the child;
g) report concerns to the DSP in writing via MyConcern.
h) **report directly to Children's Services if there is a risk of immediate serious harm to a child (see Appendix B)**;
i) press for action if they are not satisfied with the response to their reported concern or report;
j) receive SC Framework level B or A training (depenent on their role in school) which identifies:
    i. their personal responsibility;
    ii. the agreed local procedures;
    iii. the need to be vigilant in identifying cases of abuse;
    iv. how to support a child who discloses abuse.

1.3.8 **Handling allegations of abuse against all staff and any other stakeholders**

1.3.8.1 Staff should take care to protect themselves from allegations of abuse by following the guidelines in the Staff Code of Conduct.

1.3.8.2 The School has a duty of care to our teachers, staff and other stakeholders. Should an allegation of abuse be made against any member of staff, we will act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty.

1.3.8.3 Any allegation of abuse made against a teacher or other member of staff or volunteer in an education setting will be dealt with fairly, quickly and consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation. The quick resolution of allegations of abuse will be a clear priority to the benefit of all concerned. All unnecessary delays will be eradicated. See Appendix I

1.3.8.4 If an allegation is made, the School will follow section 5 of Wales Safeguarding Procedures for handling allegations against staff and the guidance from the Welsh Government circular 009/2014 Safeguarding children in education: handling allegations of abuse against teachers and other staff. (See also Section 3.0 Reporting Procedures).

1.4.1 **Pupils**

There are two child friendly policies on our school website, one for Prep school and one for Seniors.

1.4.2 **Parents**

1.4.2.1 Parents/carers should be aware that schools have a responsibility to ensure the well-being of all children. This responsibility means that the School:

a) will have Safeguarding (and child protection) policy and procedures;
b) will make parents or carers aware of its safeguarding policy through the School website, and that this may require their child or young person to be-reported to the statutory welfare agencies if the School believes that the child or other children may be at risk of significant harm;
c) should endeavour to work with parents/carers regarding early help and the welfare of their child and remain impartial if their child is being, or has been referred;
d) should help parents or carers understand that if a report is made to Children's Services or the police, it has been made in the best interests of the child and that the School will be involved in any child protection enquiry or police investigation in relation to their child's welfare and educational progress;
e) keep the parents or carers informed of the welfare and educational progress of the child.

Parents are also made aware during Welcome Events, at the start of each year, that they can report a concern to school electronically using MyVoice. There are reminders about this method of reporting throughout the year.

1.4.2.2 Where a member of staff has a concern about a child, the matter will be discussed with parents only on the advice provided by the local Children's Services department, in consultation, where appropriate, with the police.

1.4.2.3 The DSP at the School should clarify with these statutory agencies, when, how and by whom, the parents or carers will be told about any report. The DSP will also seek advice as to whether or not the child should be informed of the process.

1.4.2.4 As a parent or carer you may sometimes feel alone but there is usually somebody you can talk to. Caring for children is not always easy and if you're struggling to cope you may need to ask for help and support to protect your child.

You may find the following helpful:

a) make time to talk and listen to your child;
b) familiarise yourself with your child's friends and routine;
c) be sensitive to changes in behaviour;
d) teach your child to feel confident to refuse to do anything they feel is wrong;

e) be aware of your child's use of the internet and mobile phone to ensure they don't place themselves at risk, using home internet security and encouraging the use of privacy settings;
f) familiarising yourself with agencies and resources available which could support you (see Appendix B).

2.0 PRACTICAL ADVICE: SIGNS AND SYMPTOMS OF ABUSE AND NEGLECT

2.1 Recognising abuse

2.1.1 To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

2.1.2 Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

2.1.3 There are five categories of abuse: physical abuse, emotional abuse, sexual abuse, neglect and financial abuse:

2.1.4.A **Physical abuse**
The hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates or induces illness in a child whom they are looking after.

2.1.4.B **Emotional abuse**
The persistent emotional ill-treatment of a child, such as to cause severe and persistent adverse effects on the child's emotional and behavioural development.

2.1.4.C **Sexual abuse**
Forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening, including:

a) physical contact, including penetrative or non-penetrative acts;
b) non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities; or
c) encouraging children to behave in sexually inappropriate ways.

2.1.4.D **Neglect (Social Services and Well-Being act 2014, Wales)**
A failure to meet a person's basic physical, emotional, social or psychological needs, which is likely to result in an impairment of the person's well-being (for example, an impairment of the person's health or, in the case of a child, an impairment of the child's development.

2.1.4.E **Financial abuse**

Financial abuse is a category that is less prevalent for children. Young people may be vulnerable and often not aware of the risk of financial abuse. With regards to pressure about money and the misuse of money it is a form of emotional abuse that can involve peers of the age 16-17 as well as adults abusing children. Financial abuse also includes theft and fraud.

2.1.5 **Indicators and signs of abuse**

2.1.5.1 Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

2.1.5.2 **It is the member of staff's responsibility to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

2.1.5.3 A child who is being abused or neglected may:

a) have bruises, bleeding, burns, fractures or other injuries
b) show signs of pain or discomfort
c) keep arms and legs covered, even in warm weather
d) be concerned about changing for PE or swimming
e) look unkempt and uncared for
f) change their eating habits
g) have difficulty in making or sustaining friendships
h) appear fearful
i) be reckless with regard to their own or other's safety
j) self-harm
k) frequently miss school or arrive late
l) show signs of not wanting to go home
m) display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
n) challenge authority
o) become disinterested in their school work
p) be constantly tired or preoccupied
q) be wary of physical contact
r) be involved in, or particularly knowledgeable about drugs or alcohol
s) display sexual knowledge or behaviour beyond that normally expected for their age.

2.1.5.4 Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSP to decide how to proceed. It is very important that you report your concerns – you do not need 'proof' that the child is at risk.

2.1.6 **Impact of abuse**

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

2.1.7 **Children with Additional Support Needs and Disabilities**

We recognise that statistically children with behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children and young people with profound and multiple disabilities, sensory impairment and or emotional and behaviour problems need to be particularly sensitive to signs of abuse.

2.1.8 **Children who may be particularly vulnerable**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge the diverse circumstances of children, rather than the individual personality, impairment or circumstances of the child. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that all our pupils receive equal protection, we will give special consideration to children who are:

~~a)~~ disabled or have additional support needs
b) living in a domestic abuse situation
c) affected by parental substance misuse
d) asylum seekers
e) living away from home
f) vulnerable to being bullied, or engaging in bullying
g) living in temporary accommodation
h) living transient lifestyles
i) living in chaotic and unsupportive home situations
j) vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
k) involved directly or indirectly in prostitution or child trafficking
l) not using English as a first language.

3.0 REPORTING PROCEDURES

3.1 Procedures for reporting concerns

3.1.1 The reporting procedures contained in this policy applies to all staff, who can all be the first point of disclosure for a child. The procedures are consistent with the Safeguarding Wales procedures. The flow chart in Appendix C highlights the procedures.

Procedures for identifying and reporting cases, or suspected cases, of abuse:

3.1.1.A Procedures for concerns about a child

3.1.1.A1 There will be occasions when you suspect that a pupil may be at risk, but you have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or you may have noticed physical but inconclusive signs. In these and other circumstances of concern, you should try to give the pupil the opportunity to talk. The signs you have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine to ask the pupil if they are OK or if you can help in any way.

3.1.1.A2 Complete a formal report using MyConcern reporting software, noting dates, times, and the reasons for your concern. If the pupil does begin to reveal that they are being harmed, you should follow the advice in the section 4.0 'Dealing with Disclosures'.

3.1.1.A3 The DSP will make one of two reasoned decisions and will feedback any non-confidential actions:

I. The concern is of a pastoral nature and will be referred to the relevant pastoral leader;
II. The concern is of a safeguarding nature. The DSP will seek advice regarding the concern from Children's Services of the LA within which the pupil resides or the LA in which the incident took place if this is different from their home LA and will take advice on whether a report needs to be made and when/if parents should be contacted.

3.1.1.B Procedure for concerns about a child involving suspicions against a member of staff, The Head or Governors

3.1.1.B1 *ALL ALLEGATIONS MUST BE REPORTED IMMEDIATELY*

3.1.1.B2 Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the safety and welfare of the child is paramount. The School's whistleblowing code (located via the desktop home screen in the Policies Manual) enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

3.1.1.B3 If a person believes a current member of the School's staff has:

a. Behaved in a way that has harmed a child, or may have harmed a child;
b. Possibly committed a criminal offence against or related to a child; or
c. Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children

The person with the concerns must:

Immediately report the allegation directly to The Head or to the Designated Governor should the concerns regard The Head.

I. It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. Remember the welfare of a child is paramount.
II. You may raise your concern verbally or in writing but should record all verbal conversations in writing.
III. A friend, colleague or union representative may accompany you to the meeting if you wish.
IV. Ensure The Head or Designated Governor informs you of their proposed action and sets a date for a second meeting.
V. Timescales will depend on the complexity of the initial inquiry, but the case should not be allowed to stall and you should receive initial feedback within 10 working days. The timescale for subsequent feedback should then be agreed.
VI. Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.

3.1.1.B4 For safeguarding concerns about a current member of staff The Head:

I. Will consider the allegation and may report the concern directly to the Local Authority Designated Officer (LADO) who will then make a decision regarding action needed.
II. Will immediately inform the police if the matter regards a possible criminal offence.
III. May, at any point after being informed about the allegation, decide to suspend the individual employee, without prejudice, until enquiries/investigations have taken place in line with Section 5.

3.1.1.B5 If initial enquiries unequivocally demonstrate that the allegation is false and/or unfounded The Head may make the decision that no further action is needed. The Head will record the reasons for the decision.

3.1.1.B6 In the event of no further action The Head will consider the following:

I. Informing the child's parents about the allegation and outcome.
II. Informing the individual employee about the allegation, including the amount of detail that should be provided.

3.1.1.B7 If, following initial enquiries, there is cause to suspect a child is suffering or likely to suffer significant harm, and/or a criminal offence involving a child has been committed, and/or the individual employee has behaved towards a child in a way that indicates he/she is unsuitable to work with children, The Head, in consultation with the police and LADO, will attend a strategy discussion meeting to consider any immediate action to protect the child. The safeguarding governor will be kept informed.

3.1.1.B8 For concerns about The Head, the Designated Governor will report the concern directly to the LADO who will then decide regarding action needed.

3.1.1.B9 For concerns about a Governor you may report your concern directly to the LADO who will then decide regarding action needed (See contact details in Appendix B).

3.1.1.B10 The School will retain any and all documents; correspondence, notes, emails, and all other information – however held – which contain or may contain content pertaining directly or indirectly to the sexual abuse of children or to child protection and care.

3.1.1.B11 *For more detailed information, including information sharing, refer to Wales Safeguarding Procedures and Welsh Government Circulars:*

See section 5 of Wales Safeguarding Procedures for handling allegations against staff

002/2020: Disciplinary and Dismissal Procedures for School Staff
009/2014: Safeguarding children in education: handling allegations of abuse against teachers and other staff

4.0 DEALING WITH DISCLOSURES

4.1 What to do if a child tells you they have been abused by someone other than a member of staff

4.1.1 It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

4.1.2 If a pupil talks to you about any risks to their safety or well-being you will need to let them know that you must pass the information onto the DSP. The point at which you do this is a matter for professional judgement. If you jump in immediately the pupil may think that you do not want to listen, if you leave it till the very end of the conversation, the pupil may feel that you have misled them into revealing more than they would have otherwise.

4.1.3 During your conversation with the pupil:

a) Allow them to speak freely.

b) Remain calm and do not overreact – the pupil may stop talking if they feel they are upsetting you.
c) Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
d) Do not be afraid of silences – remember how hard this must be for the pupil.
e) Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what the pupil's mother thinks about all of this.
f) At an appropriate time tell the pupil that in order to help them you must pass the information on.
g) Do not offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
h) Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong.
i) Tell the pupil what will happen next. The pupil may agree to go with you to see the DSP. Otherwise let them know that someone will come to see them before the end of the day.
j) Report verbally to the DSP.
k) Write up your conversation as soon as possible on the record of concern form and hand it to the DSP by the end of the day.
l) Seek support if you feel distressed; colleagues, DSP and the counsellor are here to help.

4.1.4 **Taking action**

The flow chart in Appendix C highlights the procedures for dealing with disclosures. Key points to remember for taking action are:

I. report the disclosure, in writing, to the DSP by the end of the day; the sooner the better. A verbal report as an addition is preferable
II. do not start your own investigation
III. share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
IV. complete a 'Report a Concern' form on MyConcern
V. seek support for yourself if you are distressed.

4.2 Confidentiality

Education staff have a professional responsibility to share relevant information about the protection of children with the designated statutory agencies when a child is experiencing child welfare concerns. It is important that each member of staff deals with this sensitively and explains to the child that they must inform the appropriate people who can help the child, but that they will only tell those who need to know to be able to help. They should reassure the child and tell them that their situation will not become common knowledge within the School. Be aware that it may well have taken significant courage on their part to disclose the information and that they may also be experiencing conflicting emotions, involving feelings of guilt, embarrassment, disloyalty (if the abuser is someone close) and hurt.

4.3 Notifying parents

4.3.1 The School will normally seek to discuss any educational and welfare concerns about a pupil with their parents. However, in some circumstances a child may need to be spoken to and a report submitted to Children's Services without the knowledge or the consent of their parent/carer. Where a decision is made by the DSP *not* to seek parental consent the rationale for not doing so must be recorded. This could follow advice given from Children's Services. The decision to inform parents may be taken at a professionals strategy meeting which would be called by Children's Services. The decision will then be taken as to who will inform the parents, what they are told and when. It will often not be any member of staff from the School who will carry out the task. In any case the parents should not be informed without taking advice from Children's Services.

4.3.2 Circumstances for not seeking parental consent could include:

a) place a person at increased risk of harm
b) prejudice the prevention, detection, or prosecution of a serious crime; or
c) lead to an unjustifiable delay in making enquiries and/or lead to evidence being lost
d) The parent is identified as the alleged abuser
e) The child in question is not wishing the parent to be involved at that stage and is competent to make that decision.
f) It is in the public interest.

4.4 Procedure for dealing with child on child safeguarding disclosures and allegations – including children with sexually harmful behaviour.

This section should be should be cross referenced to the Wales Safeguarding Procedures, 2019

4.4.1 **Unkindness, bullying, physical aggression towards and coercion of peers**

Children may be harmed by other children. Staff will be aware of the harm caused by unkindness, bullying (including 'doxing'), physical aggression, and coercion and will use the School's behaviour procedures appropriately. Staff will utilise the guidance flow chart in Appendix D to identify actions that need to be taken for unkind behaviour, bullying and safeguarding concerns.

I. If necessary, the DSP will discharge the relevant pastoral leader to prepare a Risk Assessment which includes a preventative and supervisory plan. The plan should be monitored, and a date set for review.
II. The DSP will also consider if other children in the School are at risk and if they require individual or group Risk Assessments.

4.4.2 **Child on Child Abuse and Harmful Sexual Behaviour**

Rougemont School has a zero-tolerance approach in which sexual violence and sexual harassment is never acceptable. We recognise that physical behaviours should not be dismissed or tolerated e.g., grabbing bottoms, breasts or genitalia, pulling down trousers, flicking bras, lifting skirts. We recognise that downplaying behaviours related to abuse can lead to a culture

of unacceptable behaviour, an unsafe environment and may so normalise abuse that children accept it as the norm and not report.

4.4.2.1 **Definitions**

Children's sexual behaviour exists on a continuum, from what is developmentally normal to problematic behaviours that may be abusive and violent. The umbrella term 'harmful sexual behaviour' HSB is used to describe problematic, abusive, and violent sexual behaviours. It is important to understand what is meant by the terms peer on peer sexual violence, sexual abuse, and sexual harassment.

Child on child sexual violence is:

- Assault through intentional sexual touching
- Assault by penetration
- Rape.

Child on child sexual harassment is:

- Inappropriate and unwanted conduct of a sexual nature such as sexual comments, remarks or jokes together with online sexual harassment.

Child on child sexual abuse is:

- Any form of child on child sexual violence or harassment
- Sexual abuse which occurs in intimate personal relationships
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm.
- Non-consensual sharing of nudes and semi nudes images and/or videos including 'deep fakes' - intimate images made or altered with computer graphics to replace the likeness of one person with another. Note: Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. See section 4.5.8 for specific procedures in responding to this type of abuse.

4.4.2.2 Reports of sexual abuse by children and young people must always be treated seriously and may be reported to Children's Services and/or the police. The DSP will reference the Brook traffic light tool, see Appendix G, when deciding upon the response to the reports.

4.4.2.3 Staff need to be aware that children and young people may exhibit sexualised behaviour and may commit sexual offences. They should not dismiss abusive sexual behaviour as normal and adaptive, and need to know that a child under 13 cannot in law consent to sexual activity.

4.4.2.4 Staff members need to identify when sexual relationships between children are coercive, inappropriate or exploitative. Staff should familiarise themselves with the Brook Traffic light tool in Appendix G.

4.4.2.5 The needs of children and young people who abuse other children should be considered separately from the needs of the children harmed, and where a report by the DSP is made this must be carried out separately in each case. Children and young people who abuse others are likely to have considerable needs themselves as well as posing a significant risk of harm to other children. They may also be in need of protection.

4.4.2.6 The management of children who evidence harmful sexual behaviour is complex and the School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both the harmer and victim, separately.

4.4.2.7 Staff who are concerned about or receive a safeguarding allegation made by a pupil against another pupil should follow the reporting procedures and Appendix C. Then,

I. The DSP will make a reasoned decision to report to Children's Services and will call the police if the allegation indicates that a crime has been committed. Upon reporting the DSP will also seek advice from the LA about:
    a) informing the parents (see notifying parents) as the police may already be involved.
    b) offering counselling or pastoral care so as to not compromise potential legal proceedings.

II. If the DSP does not consider the allegation to be a safeguarding concern or if neither the police or Children's Services accept the complaint a thorough school investigation should take place using the School's disciplinary procedures.

III. For cases of child on child abuse the DSP may prepare a Risk Assessment for both the harmer and victim. The plan should be monitored, and a date set for review. If there is a report of sexual violence an immediate risk assessment must be made. Risk assessments following a report of sexual harassment will be made on a case-by-case basis.

IV. The DSP will also consider if other pupils in School are at risk and if they require individual or group Risk Assessments.

V. Risk Assessments should consider:

- The victim, especially their protection and support. This includes the wishes of the victim in terms of how they want to proceed, especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- The nature of the alleged incident(s), including whether a crime may have been committed and/ or whether HSB has been displayed.
- The ages of the children involved.
- The developmental stages of the children involved.
- Power imbalances between the children e.g., the alleged perpetrator(s) being significantly older or mature.
- Victims who have a disability or learning difficulty.
- Whether there have been other victims.

- The alleged perpetrator(s).
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).
- All other children/young people and staff in the setting, with regard to actions appropriate to protect them from the alleged perpetrator(s) or future harms.
- Sexual violence and sexual harassment taking place within intimate personal relationships between peers.
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

4.4.2.8 If the information is from any other source the School must first report to the LA. The School should work closely with and seek advice from the LA throughout, and following the result of, any investigation. These children and/or their families may already be known to them or the police.

4.4.2.9 Careful and accurate notes of all conversations, correspondence and actions should be made throughout by the DSP and kept according to the data protection guidance.

4.4.2.10 It is important that pupils who make a child-on-child disclosure know about the process and who is involved. This is outlined in Appendix E.

4.5 Online Safety

4.5.1 This section of the policy should be read in conjunction with the Pupils' Use of ICT, Mobile Phones and Electronic Devices Policy

4.5.2 Most of our pupils will use mobile devices and computers at some time and these positive uses should be acknowledged and promoted. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The Pupils' Use of ICT, Mobile Phones and Electronic Devices Policy explains how we try to keep pupils safe in school. Cyber-bullying by pupils, via texts and emails, as well as other forms of harassment such as 'doxing', will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

4.5.3 Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour although it is recognised that monitored forums and discussions are a valuable means of contact for senior pupils. All online activity is closely monitored at school using an automated key words application. Some pupils will undoubtedly be 'chatting' on mobiles or social networking sites at home and Online Safety issues are covered extensively throughout the ICT curriculum and PSHE.

4.5.4 **Managing Online Safety -** Online Safety Act 2023 (legislation.gov.uk)

We endeavour to embed Online Safety messages across the curriculum whenever the internet and/or related technologies are used. The Online Safety section of this policy will be introduced to the pupils at the start of each school year within PSHE and Enrichment. In order to bring Online Safety to prominence, posters will be displayed in and around the School. The key Online Safety advice will be promoted widely through school displays, newsletters, class activities and so on. We will participate in Safer Internet Day every February. Through ICT, PSHE lessons, assemblies and tutor periods pupils will be taught about; online risks, inside and outside school; data protection and intellectual property; safe use of images; cyberbullying and its effects; where to seek help, for example CEOP or Childline.

4.5.5 **Child abuse images and the Internet**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect pupils we will:

a) seek parental consent to use their child's image in school publications (this is done through an opt-out system when a child joins the School);
b) use only the pupil's first name with initial of surname with an image, so their name cannot be 'googled';
c) ensure pupils are appropriately dressed;
d) encourage pupils to tell us if they are worried about any photographs that are taken of them.
e) Follow guidance from https://hwb.gov.wales/keeping-safe-online/data-privacy-and-online-consent/guidance-to-support-schools-with-learner-image-security/
f) Rougemont School is committed to responsible management, using, sharing and protection of photos and videos of children and young people across our online platforms, to address the risk of AI image manipulation
g) Rougemont School looks to ensure images do not contain identifiable information that could be used to harm or blackmail an individual (e.g. full names or faces).
h) Rougemont School uses imagery that is harder to misuse or abuse, e.g. by only sharing photos taken from a distance, blurred images or images taken from over the shoulder.
i) Rougemont School aims to apply privacy settings to help limit who can view and share content (on social media or any other place the images are stored or shared).
j) Rougemont School aims to remove metadata (e.g. EXIF data) from the images that may reveal location, device details or timestamps.
k) Image security awareness training and practices are included in staff training and policies.
l) Rougemont School has adopted the following guidance developed by the UK Online Harms Early Warning Working Group: Education Guidance on 'Protecting

your setting's images from AI manipulation and abuse' https://d1xsi6mgo67kia.cloudfront.net/uploads/2026/05/Education-guidance-Protecting-your-settings-images-from-AI-manipulation-and-abuse.pdf

4.5.6 **Online Safety Staff Training**

Our staff receive regular information and training on Online Safety and how they can promote the 'Online Safety' message:

a) The DSP and staff with responsibility for Online Safety will attend training seminars as appropriate and will disseminate to staff keeping staff up-to-date with current areas of concern
b) The School will hold parental information evenings/disseminate information via the school newsletter and website to better inform parents of Online Safety issues
c) All staff have been made aware of their individual responsibilities relating to the safeguarding of children within the context of Online Safety and know what to do in the event of misuse of technology by any member of the School community
d) All staff are encouraged to incorporate Online Safety activities and awareness within their curriculum areas.

4.5.7 **Monitoring of Online Safety**

4.5.7.1 The DSP and DDSPs are responsible for reviewing Online Safety reports sent by Impero / Student Keeper. Individual reports will be recorded on MyConcern to identify trends and act on specific concerns.

4.5.7.2 Any cause for a safeguarding concern will be dealt with as described in the 'Procedures for reporting concerns' section.

4.5.8 **Responding to incidents of sharing nude or semi-nude images**

4.5.8.1 Sharing images has become commonplace with the ease of modern technology. The increasing number of children and young people with mobile devices and the speed and ease of sharing images has brought concerns about sharing nude images (sometimes referred to as 'sexting'). These behaviours can expose young people to risks including non-consensual sharing of images, embarrassment, bullying and increased vulnerability to blackmail and coercion or sexual exploitation. Creating and sharing sexual images of under-18s is also illegal and this is still the case if the image is a selfie. However, criminalising children and young people who take and share nudes and semi-nudes of themselves, apart from in exceptional cases, is not in the public interest or best interests of those involved.

4.5.8.2 What to do if an incident comes to your attention:

a) If it is a disclosure from a child it must be taken seriously
b) Report it to your DSP immediately.
c) Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.

d) If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSP.
e) Do not delete the imagery or ask the young person to delete it.
f) Do not ask the child/children or young person/people who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSP.
g) Do not share information about the incident with other members of staff, the young person/people it involves or their, or other, parents/carers.
h) Do not say or do anything to blame or shame any young person/people involved.
i) Do explain to them that you need to report it and reassure them that they will receive support and help from the DSP.

4.5.8.3 Actions for the DSP:

a) the DSP should hold an initial review meeting with appropriate staff. The DSP may wish to seek general advice from their School Community Police Officer (SCPO). This meeting should establish:
    i) whether there is an immediate risk to a child or young person, using Brook's Traffic Light Tool in Appendix G to help categorise.
    ii) if a report should be made to the police and/or social services.
    iii) what further information is required to decide on the best response.
    iv) whether the image(s) has/have been shared widely and via what services and/or platforms. This may be unknown.
    v) any relevant facts about the children or young people involved that would influence risk assessment.
    vi) if there is a need to contact another setting or individual.
    vii) whether to contact parents/carers of the children or young people involved – in most cases they should be involved.

b) there should be subsequent interviews with the children or young people involved (if appropriate)
c) parents/carers should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents/carers would put the child or young person at risk of harm
d) at any point in the process if there is a concern a child or young person has been harmed or is at risk of harm a report will be made to social services and/or the police immediately in line with the setting's usual arrangement. An immediate report to the police and/or social services should be made if:
    a. the incident involves an adult.
    b. there is reason to believe that a child or young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (e.g. owing to additional learning needs).
    c. what you know about the imagery suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent.
    d. the imagery involves sexual acts and any child in the image is under 13.
    e. you have reason to believe a child or young person is at immediate risk of harm owing to the sharing of the imagery, e.g. the child or young person is presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or social services. This decision would be made in cases where the DSP is confident that they have enough information to assess the risks to the children and young people involved and that the risks can be managed within the setting's pastoral support and disciplinary framework, as well as (if appropriate) their local network of support, including referrals to non-statutory agencies. The decision should be made by the DSP in consultation with the headteacher.

e) if the child has a social worker, you should inform social services about the incident.

5.0 SAFEGUARDING RESPONSIBILITIES IN SPECIFIC CIRCUMSTANCES

5.1 Female Genital Mutilation (FGM)

5.1.1 Female Genital Mutilation (FGM) is defined as: All procedures (not operations) which involve partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or other non-therapeutic reasons.

5.1.2 This procedure is typically carried out on young girls (but can be carried out from birth to adulthood). FGM is illegal in the UK and girls and women from Africa are particularly at risk.

5.1.3 **Legislation includes**:

a) the right to anonymity for victims;
b) the offence of failing to protect a girl aged under 16 from the risk of FGM;
c) the duty on professionals/practitioners (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. (The age is determined by their age at the time of disclosure) **NB: For school staff this will occur from a disclosure and not a physical examination;**
d) the duty of the DSP to inform the LA (Wales).

5.1.4 You should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

5.1.5 **Risk factors include**:

a) low level of integration into UK society
b) mother or a sister who has undergone FGM
c) girls who are withdrawn from PHME
d) visiting female elder from the country of origin
e) being taken on a long holiday to the country of origin
f) talk about a 'special' procedure to become a woman
g) girls who are from (or whose family members are from):
Burkina Faso, The Gambia, Sierra Leone, Djibouti, Guinea, Somalia, Egypt, Liberia, Sudan, Eritrea, Mali, Ethiopia, Mauritania.

5.1.6 **Signs that FGM may be about to take place include:**

a) Parents state that they or a relative will take a girl out of the country for a prolonged period of time
b) A girl may talk about a long holiday to the country of her origin or another country listed above
c) A girl may confide to a professional/practitioner that she is to have a 'special procedure' or 'ceremony' or to attend a special occasion.
d) A professional/practitioner hears reference to FGM in conversations, for example between peers
e) Any girl whose birth mother or sister has been subjected to FGM must be considered to be at risk.

5.1.7 **Signs that FGM may have already taken place include:**

a) A girl may spend long periods of time away from the classroom during the day (with bladder or menstrual problems)
b) A prolonged absence from school
c) Prolonged absences from school with behavioural changes noticeable.
d) Withdrawal/depression
e) A girl who requires to be excused from physical exercise lessons without GP support
f) A girl who discloses or asks for help.

5.1.8 **Procedure for dealing with FGM concerns**

If you are concerned that FGM may be about to or has already taken place you must:

I. Report to the police using telephone number 101 by the end of the next working day but ideally as soon as possible;
II. Report your concern immediately to the DSP who will contact the LA's Children's Services (Section 130 of the Social Services and Well-being Act, Wales 2014);
III. Report directly to the police using 999 if the child is in immediate danger;
IV. Do NOT contact parents.

5.2 Foster care, including private fostering

5.2.1 *A private fostering arrangement is one that is made privately (without the involvement of the LA) for the care of a child under the age of 16 (18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.*

5.2.2 The School has a duty to inform the LA about any privately fostered children.

5.3 Forced marriage and honour based violence

5.3.1 *A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used.*

5.3.2 It is a criminal offence to force someone to marry. This includes:

a) taking someone overseas to force them to marry (whether or not the forced marriage takes place);

b) marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not);
c) breaching a Forced Marriage Protection Order.

5.3.3 **Procedure for reporting concerns about Forced Marriage**

If there are concerns that a child (male or female) is in danger of a forced marriage, the DSP should be informed as soon as possible. The DSP will then contact the Forced Marriage Unit (Tel: 020 7008 0151), where experienced caseworkers are able to offer support and guidance. The DSP will also inform the LA.

5.4 Child sexual exploitation (CSE)

5.4.1 *CSE is the coercion or manipulation of children and young people into taking part in sexual activities. It is a form of sexual abuse involving an exchange of some form of payment which can include money, mobile phones and other items, drugs, alcohol, a place to stay, 'protection' or affection. The vulnerability of the young person and grooming process employed by perpetrators renders them powerless to recognise the exploitative nature of relationships and unable to give informed consent. This includes 16-17 year old children.*

5.4.2 **It is illegal for any adult to send a sexual message to a child.**

5.4.3 **Signs:**

There are a number of signs when identifying CSE

a) periods of going missing overnight or longer
b) older 'boyfriend' or relationship with a controlling adult
c) physical or emotional abuse by that 'boyfriend' or controlling adult
d) entering and/or leaving vehicles driven by unknown adults
e) unexplained amounts of money, expensive clothing or other items
f) physical injury without plausible explanation.

5.4.4 **Procedure if you are concerned:**

I. Inform the DSP and complete a Concern Form using MyConcern; do not investigate
II. DSP to report to Children's Services by completing a DTR Form and complete the (SAFE) child exploitation screening tool. See Appendix H for the form, screening tool and guidance document.
III. Keep all evidence.

5.5 Fabricated or induced illness (FII)

5.5.1 Fabricated or induced illness (FII) is when a parent or carer fakes, or creates, the symptoms of an illness in their child. This might include giving a child medicine, tampering with medical equipment or falsifying test results. It is a form of abuse.

5.5.2 **Signs:**

There are a number of signs when identifying FII:

a) Frequent and often unexplained absences from school

b) Regular absences to keep a hospital or doctor's appointment
c) Repeated claims by a parent/carer that a child is frequently unwell and requires medical attentions for symptoms or illnesses that have not been observed by staff
d) Conflicting or patently untrue stories about illnesses, accidents or deaths in the family
e) Significant changes to a child's physical or emotional state and changes in behaviour
f) Unexplained injuries.

5.5.3 **Procedure if you are concerned:**

I. Inform the DSP and complete a Concern Form; do not investigate
II. DSP to make a referral-decision Children's Services
III. Keep all evidence.

5.6 Duty to Prevent (Radicalisation and Terrorism)

5.6.1 *Keeping pupils safe from the dangers of radicalisation and extremism.*

5.6.2 '**Extremism'** is defined In the Counter-Extremism Strategy (HM Government, 2015) government office as: "Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas."

The March 2024 definition further clarifies that extremism is: "the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: negate or destroy the fundamental rights and freedoms of others; or undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve the[se] results."

5.6.3 '**Radicalisation'** is defined by the Home Office defines as: "the support of terrorism and extremist ideologies associated with terrorist groups".

5.6.4 Exposure of children to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. The Home Office 2024 states that the Prevent Strategy "helps to ensure that people who are susceptible to radicalisation are supported as they would be under safeguarding processes".

5.6.5 Schools have the duty to have due regard to the need to prevent people from being drawn into terrorism. In particular the statutory guidance on the Prevent duty summarises the requirements on schools in terms of four general themes:

- risk assessment;
- working in partnership;
- staff training; and
- IT policies.

This advice focuses on those four themes:

5.6.6 **Risk Assessment**

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour.

5.6.6.1 **Risks of Radicalisation**

Why might a young person be drawn towards extremist ideology? It appears a decision by a young person to become involved in violent extremism may begin with a search for answers to questions about identity, faith and belonging. Research to date indicates that the attraction:

a) May be driven by the desire for "adventure" and excitement
b) May be driven by a desire to enhance the self-esteem of the individual and promote their "street cred"
c) Is likely to involve identification with a charismatic individual and attraction to a group which can offer identity, social network and support
d) May be fuelled by a sense of grievance that can be triggered by personal experiences of racism or discrimination.

5.6.6.2 **Recognising indicators of extremism**

These may include:

a) Showing sympathy for extremist causes
b) Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
c) Attempts to recruit others to the group/cause
d) Glorifying violence/condoning or celebrating acts of terrorism
e) Evidence of possessing illegal or extremist literature
f) Advocating messages similar to illegal organisations such as "Muslims Against Crusades" or other non-proscribed extremist groups such as the English Defence League
g) Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

5.6.7 **Working in partnership**

We will work with the LSCB and use their threshold guidance indicating when a child or young person might be referred for support. Where a concern is raised the School will effectively engage with parents / the family as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Advice to be taken from the LA.

5.6.8 **Staff training**

Training on recognising and responding to the risk of violent extremism is undertaken by all staff on an annual basis, WRAP, as part of the safeguarding training for staff at the start of each academic year and as part of the induction process for new staff. The DSP, and Deputy DSPs will attend update training in relation to the Prevent Strategy and maintain close links with the local Channel Project and the Prevent Engagement Officers. Pastoral leaders will receive updated training disseminated by the DSP. School staff will also complete the following online training resource, Preventing Online Radicalisation Supporting Parents/Carers & Early Help Practitioners:
https://hwb.gov.wales/news/articles/e760e420-7139-40d8-80be-53e73fa6476c
And /or
https://www.support-people-susceptible-to-radicalisation.service.gov.uk/portal#awareness-course

5.6.9 **IT policies**

5.6.9.1 Schools are to ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. As with other online risks of harm, every teacher needs to be aware of the risks posed by the online activity of extremist and terrorist groups.

5.6.9.2 PSHE can be an effective way of providing pupils with time to explore sensitive or controversial issues and equipping them with the knowledge and skills to understand and manage difficult situations. The subject can be used to teach pupils to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and well-being. They can also develop effective ways of resisting pressures, including knowing when, where and how to get help. Schools can encourage pupils to develop positive character traits through PHME, such as resilience, determination, self-esteem, and confidence.

5.6.10 **Procedures for concerns about radicalisation and terrorism**

5.6.10.1 If a member of staff has a concern about a particular pupil, they should follow the normal safeguarding procedures including discussing with the DSP, and where deemed necessary, with Children's Services. You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice. The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly.
Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

Referral to Channel/Prevent Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

• identifying individuals at risk
• assessing the nature and extent of that risk
• developing the most appropriate support plan for the individuals concerned.

Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. It is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that might want them to embrace terrorism, and before they become involved in criminal terrorist activity.

Referral to Prevent

A referral to Prevent is submitted via the All Wales Prevent Referral Form

All Wales Prevent Partners Referral Form - English (south-wales.police.uk)

Any referral into Prevent must also be accompanied by a DTR Form submitted into MASH. The Channel Panel is a multi-agency panel consisting of Prevent staff from the LA and statutory partners including partners from education, health, social services and others.

5.7 Bullying and bullying around race

Our policy on bullying is set out in the following separate documents and is reviewed annually:

- Anti-bullying Policy

5.8 Foreign exchange visits

It is a matter for the School to satisfy itself when considering planning to allow a host family in Wales to have contact with a visiting child, that the members of the host family are not included on a barred list. Advice should be sought from the Disclosure and Barring Service. The School should work with its partner school abroad to ensure that similar assurances are received prior to a visit.

5.9 Gender based violence, domestic abuse and sexual violence (VAWDASV)

Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

5.9.1 Violence against women, domestic abuse and sexual violence can have a huge impact on affected children and young people. It can affect their safety, health and well-being, educational attainment, family and peer relationships, and their ability to enjoy healthy, happy, respectful relationships in the future. It is likely that there will be young people and staff within your school who are experiencing or perpetrating violence against women, domestic abuse or sexual violence. Every school should be responsible for making sure its learners and staff are safe and healthy.

5.9.2 The School will raise awareness amongst staff and pupils; promote a whole-school ethos on these issues; and create an environment where victims of violence against women, domestic abuse and sexual violence are empowered and helped to disclose their experiences.

Operation Encompass

The school is registered alongside all Newport schools as a partner for Operation Encompass. Under Operation Encompass, schools are contacted by the Local Authority about incidents of domestic abuse/domestic violence within 24 hours of their being notified to the Authority. This enables school staff to consider safety and well-being support for the children involved in these incidents.

5.9.3 **Identification and monitoring of violence against women, domestic abuse and sexual violence in schools**

Monitoring in relation to violence against women, domestic abuse and sexual violence may include:

a) implementation of age-appropriate healthy relationships (PSHE) lessons; ensuring that pupils learn about violence against women, domestic abuse and sexual violence, linking to the Welsh Government's Live Fear Free website and the 24 hour Live Fear Free Helpline.
b) introduction of appropriate mechanisms for gathering evidence about the incidence of violence against women, domestic abuse and sexual violence amongst pupils and staff.

5.9.4 The DSP will act as the first point of contact for any concerns about violence against women, domestic abuse and sexual violence regarding children and young people. Staff with any concerns should follow the Reporting Procedures.

5.9.5 Any staff, parents, pupils who are concerned about violence against women, domestic abuse and sexual violence should also have access to support services. To discuss any concerns around these issues, anyone can contact the 24 hour **Live Fear Free Helpline** (0808 80 10 800).

5.9.6 **Training**

5.9.6.1 Training will be offered in all schools through the National Training Framework on Violence against Women, Domestic Abuse and Sexual Violence to ensure:

a) school governors and every member of school based personnel are aware of gender-based violence against women, domestic abuse and sexual violence, able to recognise such abuse and know how to get help for children and young people, or indeed for themselves or their colleagues who may be victims (level 1);
b) a proportion of school-based staff are trained to respond effectively to the recognition of the indicators of abuse, including providing efficient access to risk assessment, safety planning and support (level 2); and
c) there is at least one member of staff within each school who can support staff in managing difficult cases, offering enhanced knowledge and support to children and young people within a multi-agency setting and promote increased awareness of gender-based violence, domestic abuse and sexual violence within education settings (level 3).

5.9.6.2 Further guidance on safeguarding responsibilities in additional specific circumstances can be found in Chapter 9 of Safeguarding Children: Working together under the Children Act 2004. This includes:

- Unaccompanied asylum-seeking children
- Disabled children
- Child abuse linked to belief in witchcraft or other spiritual beliefs
- Children living away from home or in temporary accommodation.

5.10 Areas of risk within school – Contextualised Safeguarding

The School will seek to identify areas of safeguarding risk within school through consultation; e.g., through pupil voice, Health and Safety strategy meetings. These areas will be discussed with pupils as they arise and inform the DSPs and SLT to consider areas of improvement.

5.11 Procedures for Suicide Prevention, Intervention and Postvention

5.11.1 The School is aware that suicide is the leading cause of death in young people and we play a vital role in helping to prevent young suicide. We acknowledge that suicidal thoughts are common, especially among young people. We believe that every suicide is a tragedy and there are several contributory factors surrounding a suicide and the reasons are often complex and individual to that person. We believe that stigma, surrounding suicide and mental illness, inhibits learning and forms a barrier to seeking help.

5.11.2 To protect pupils, we will:

a) Ensure that our governors, parents, staff, pupils themselves and other key stakeholders are aware of our commitment to be a suicide-safer school. This will be through specific training for governors, staff and pupils.
b) Acknowledge that talking about suicide does not create or worsen risk.
c) Commit to tackling suicide stigma in our language and in our working relationships.
d) Commit to promoting open, sensitive talk that does not stigmatise and perpetuate taboos. This will include avoiding the use of language which perpetuates unhelpful notions that suicide is criminal, sinful or selfish.

5.11.3 **Prevention**

As a school community, we recognise that pupils/students and on occasions adults may seek out someone whom they trust with their concerns and worries. In order to play our part in supporting any stakeholder who may have thoughts of suicide, we will:

a) Provide our pupils/students with opportunities to speak openly about their worries with people who are ready, willing and able to support them, including through the PSHE programme.
b) Record all conversations with pupils who disclose thoughts of suicide.

c) Consider whether pupils who are having thoughts of suicide are acting in a way that puts their life in danger.
d) Work in partnership with their parents and/or other professionals/practitioners where this will enhance suicide safety.

5.11.3.1 **Education and Staff training**

Staff will receive training to equip themselves with the skills to identify when a pupil/student may be struggling with thoughts of suicide. This will be achieved by:

- Staff training in suicide prevention to be refreshed periodically for key members of staff (at least every three years).
- Key pastoral staff to be trained in Mental Health First Aid.
- The Deputy Director of Upper School has completed ASIST training and will identify additional staff who should be trained in ASIST (Applied Suicide Intervention Skills) or similarly effective training.

5.11.4 **Intervention, following a disclosure or concern**

If a pupil/student or a member of staff tells you that they are depressed or suicidal, the following tips can help you open a dialogue with them and offer support in an appropriate and sensitive manner:

a) Stay calm and listen – hear them out. Avoid judgement, regardless of what's going on. Depression and suicide should always be taken seriously.
b) Ask open questions to get an understanding of what is happening for them and how it is making them feel. Remember, it's important to listen and take them seriously.
c) Don't judge, try to fix things or offer platitudes ('things will pick up', 'Life's too short' etc.)
d) Show that you're listening by reflecting on what they say and clarifying what they mean. Don't jump in with solutions – allow them to express their problems first.
e) Don't minimalise their feelings by saying it's 'just a phase', 'you'll grow out of it' or 'why is that even bothering you?' Take time to imagine what it's like for that person.
f) Give them space and time in the moment or, if they feel unable to speak at that time, acknowledge the importance of what they've said and arrange a time to talk. As hard and as painful as it might be to listen, you need to hear their reasons for wanting to die before you can focus on reasons for living.
g) It is okay to not know what to say. If you do not know what to say – be honest and tell that person. Reassure them that you are glad they told you – this can be far more empowering and genuine than making something up. If you're honest with them, they'll be honest with you.
h) Tell them that you need to pass this information on to the Designated Senior Person (DSP), to help them get the support they need.
i) Avoid using the term 'commit suicide'. Commit implies breaking the law and suicide is not a criminal offence.#

5.11.4.1 **Actions for the DSP**

Upon receiving a disclosure or a concern, relating to suicide or severe depression, the DSP will determine if the child/young person or individual is at risk of significant harm. This will be the case if the suicidal thoughts are frequent and recent or if the child young person or individual has a plan to follow. In this case the DSP will report to children's services in the case of a child or young person and contact the child/young person's parents, contacting the emergency services where necessary.

In the case of the concerns relating to a staff member the DSP will inform the Head and records will be securely stored on MyConcern Rougemont School Staff Safeguarding. Concerns can only be accessed by the DSP and Head.

5.11.4.2 If there is no immediate risk of significant harm the DSP can employ the following strategies:

a) Referral to the School Counsellor
b) Direct referral to CAMHS
c) Advise parents, and/or child if in the 6th form, to make an appointment with their GP to discuss their suicidal thoughts and/or depression
d) Create a Suicide Safety Plan (see below template):

HOPELineUK 0800 068 41 41

PAPYRUS prevention of young suicide

Suicide Safety Plan

When thoughts of suicide are overwhelming, staying safe for even 5-10 minutes takes a great deal of strength. This plan is to use during those times; it isn't a plan of how to rid yourself of thoughts of suicide, it looks at staying safe right now so that you still have the chance to fight another day and access support for whatever is impacting on those thoughts overall. These thoughts and feelings can change, it doesn't mean you will feel like this forever so let's concentrate on what you can do right now to have the chance for this to happen.

Why do I want to stay safe?

What are the reasons I don't want to die today? Are there people or animals that make me want to stay safe? Do I have hope that things might change? Am I afraid of dying? Do I want to stay alive just for right now?

Making my environment safer:

Whilst I am focusing on safety, how can I make it harder to act on any plans I might have for suicide? Where can I put things I could use to harm myself so they are harder to get to if I get overwhelmed?

-
-
-
-
-

This doesn't mean having to get rid of them forever. It is because I am looking at staying safe right now, and if these things make it harder for me to do this, I want to make it harder to use them to give me time to connect to that part of me that doesn't want to die.

e) Signpost the child to additional support such as:

Agency	**Telephone**	**te**
Childline	0800 1111	https://www.childline.org.uk
The Samaritans	*116123*	https://www.samaritans.org

	Phone lines open 24 hours every day, 365 days a year. Local branch at 43 Stow Hill, Newport, NP20 1JH, is open for visitors everyday 8am-10pm.	
Young Minds (Parents)	0808 802 5544 Sms: text YM to 85258	https://youngminds.org.uk
Charlie Waller Memorial Trust		https://www.cwmt.org.uk

f) Signpost the child to an effective app such as 'Stay Alive'.

5.11.5 **Postvention**

5.11.5.1 The School's governors and leadership team will be clear about how we will respond in the event of a suicide. This section of the policy is used by staff in conjunction with the School's bereavement protocols.

5.11.5.2 In accordance with these documents the leadership team will need to consider:

a) Informing others
b) Media communication
c) Ongoing support for the family, peers, and staff
d) Reviewing policy (this will be done on a 2-yearly basis, unless a need arises)
e) Remembrance (in close co-ordination with the family).

5.12 Procedures to be followed in case of teenage pregnancy

5.12.1 If a pupil below the age of 13 discloses that they are pregnant (or thinks they may be pregnant) a DTR Form will be required.

5.12.2 Staff are advised to follow the Fraser Guidelines when discussing personal or sexual matters with a young person under 16. Gillick competence and Fraser guidelines | NSPCC Learning. The Fraser Guidelines give guidance on providing advice and treatment to young people under 16 years of age.

5.12.3 Staff should assess the pupil's competency to give consent and of the nature of the relationship. Families First may be able to support the young person in accessing support through Early Help Team. Whether it is appropriate to share information with parents and carers should always be considered as part of the assessment and based on what is in the child's / young person's best interests. Wherever possible we would encourage the young person to inform their parent/carer. However, this may be discouraged if the parent being informed would place the child at risk of harm. In any situation of uncertainty, where a member of staff is unsure of the course of action to take then consult with MASH or Education Safeguarding Team.

5.12.4 A DTR Form would be REQUIRED if there was a concern that the child and/or unborn child was at risk of harm or the child is under 13.

6.0 CONFIDENTIALITY, SHARING INFORMATION AND RECORD KEEPING

6.1 All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that being released into the public domain does not compromise evidence.

6.2 Staff should only discuss concerns with the DSP, The Head or Designated Governor (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

6.3 Child protection information will be stored and handled for DOB +25years in line with the LSCB procedures.

6.4 Concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

6.5 Every effort will be made to prevent unauthorised access and sensitive information should be stored on The School's Cloud storage and not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Safeguarding and Child protection information will be stored separately from the pupil's online school file and a 'Safeguarding – Yes' note will be added to our systems to indicate that separate information is held.

6.6 Child protection records are normally exempt from the disclosure provisions of GDPR - The Data Protection Act (2018), which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they should refer the request to The Head.
38137 Working together to safeguard people: Non-statutory guide on information sharing to safeguard children (gov.wales)

6.7 GDPR does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. When sharing information, the DSP will need to be satisfied that there is either:

- A statutory duty to report
- Express or implied consent of the persons involved; or
- An overriding public interest in disclosing information.

One of the seven golden rules of sharing information is to consider is it; necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely. All decisions to share or not share information should be recorded in writing and stored on the schools secure database. When a request is made from children's services over the telephone for information on a child the DSP or Deputy DSP must ask for an email to be sent by that person to verify their identity as working for that authority.

6.8 Records will be kept securely with access by the DSP and Deputy DSP. The DSP must keep The Head informed of all Safeguarding concerns.

6.9 For good practice the DSP will:

a) Take reasoned actions and provide appropriate feedback to persons completing a concern form
b) Transfer records to new schools or establishments securely and separately from the main pupil file using MyConcern transfers or Knowb4 or WeTransfer.
c) Request safeguarding records from previous schools/establishments once a new pupil or student has joined
d) Keep a chronology form sheet for each file
e) Keep a concern date checklist – for identifying patterns
f) Keep a training tracker
g) Keep a secure CP Register
h) In collaboration with The Head/HR Manager, ensure there is a comprehensive Single Central Record
i) Share information as set out by statutory guidelines.

7.0 SAFER RECRUITMENT PROCEDURES

7.1 Where a post is advertised the school's commitment to safeguarding and promoting the welfare of children will be made clear. Safer Recruitment is a separate policy and is on the school website.

7.2 **Staff Code of Conduct and Protected Disclosure (whistleblowing) Policy**

7.2.1 This is a separate policy and is in the Staff Handbook. All members of staff have the right to be safeguarded and should read the Staff Handbook and health and safety policies where relevant.

8.0 SUPPORT

8.1 Supporting the pupil who may be at risk of significant harm, experiencing significant harm or who has been abused

8.1.1 We recognise that children who are at risk, suffer abuse or witness domestic violence may be deeply affected by this. This School may be the only stable, secure and predictable element in

the lives of children at risk. Nevertheless, when at school their behaviour may be challenging and defiant or they may be withdrawn.

8.1.2 The School will endeavour to support the pupil through:

a) the content of the curriculum to encourage self-esteem and self-motivation
b) the School ethos which:
   - promotes a positive, supportive and secure environment;
   - gives pupils a sense of being valued;
c) liaison with other agencies who support the pupil such as Children's Services, Child and Adolescent Mental Health Services, Education Welfare Service and Advocacy Services;
d) keeping records and notifying Children's Services as soon as there is a recurrence of a concern.

8.1.3 When a pupil on the child protection register leaves, we will immediately copy and transfer, separately and securely, CP information to the new school and inform Children's Services.

8.2 Support for those involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support pupils, their families and staff by:

a) taking all suspicions and disclosures seriously;
b) nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest;
c) responding sympathetically to pupils or staff to deal with distress or anxiety;
d) maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
e) storing records securely;
f) offering details of helplines, counselling or other avenues of external support;
g) following the procedures laid down in our whistleblowing, complaints and disciplinary procedures;
h) co-operating fully with relevant statutory agencies; and
i) offering supervision, counselling or other appropriate action for staff involved in CP procedures.

8.3 Supporting staff who are the subject of an allegation

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals/practitioners do pose a serious risk to pupils, and we

must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended without prejudice, where this is deemed to be the best way to ensure that children and/or the member of staff are protected.

9.0 GOOD PRACTICE GUIDE

9.1 Good practice guide – day to day

a) Treat all children, young people and vulnerable adults with respect
b) Avoid inappropriate conduct in speech or action
c) Challenge unacceptable behaviour
d) Respect the rights of individuals to privacy and dignity
e) Be cautious when discussing sensitive issues with children, young people, vulnerable adults and parents/carers.

9.2 Good practice guide – responding to disclosure

a) DO listen and continue to listen
b) DO explain what will happen next
c) DO report all allegations/suspicions of abuse
d) DO seek help from medical staff, Children's Services or the police if there is immediate risk
e) Do record details of your report~~/referral~~ soon as possible, preferably within an hour of the disclosure
f) DO NOT ask leading questions or investigate, question only for clarity
g) DO NOT pass judgement or draw conclusions
h) DO NOT promise confidentiality
i) DO NOT discourage children, young people or vulnerable adults who want to talk to you about attitudes or behavioural of others
j) DO NOT allow yourself to be alone with children, young people or vulnerable adults especially in a room with no windows

10.0 ABUSE OF TRUST

10.1 **All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.**

10.2 In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 and in a position of trust to send sexual messages to or have a sexual relationship with a person under the age of 18, even if the relationship is consensual.

This means that any sexual activity between a member of the School staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

10.3 The School's Code of Conduct sets out our expectations of staff. This can be found in the Staff Handbook.

Appendix A: MyConcern

Please report all concerns on MyConcern https://myconcern.education/

Guidance on completing a report.

It is important that concern reports are fully completed in a timely way. The details are important. To help the safeguarding team respond appropriately, please follow the guidance below.

- Click on Report a New Concern
- Start typing the name of pupil – each pupil must have a separate report, but reports can later be linked
- If appropriate, add a 'Body Map' to highlight any concerns of a physical nature.
- Add a brief, factual concern summary.
- Add the time and date of your report.
- Add further details to expand upon your summary – remember to separate facts from opinions. Use the language and terminology that the pupil used.
- Add a location, if applicable.
- Click the check box if the concern is urgent: An urgent concern is one where the pupil is at risk of or suffering from significant harm.
- Add an attachment, if applicable (notes or other supporting documentation).
- Submit the concern

Don't forget to ask the DSP if the concern was received and for feedback.

Appendix B: Key personnel – Safeguarding team details and contacts

Name	**Role**	**Tel: 01633 820800 (extension)**	**Email… ...@rougemontschool.co.uk**
Sarah Howell-Jones	Designated Senior Person (DSP) –	**152**	**Sarah.howell-jones@**
Andrew Bevan	Deputy DSP (Director of Prep)	**227**	**Andrew.bevan@**
Huw Singer	Deputy DSP (Director of Pathways and Partnerships)	**158**	**Huw.singer@**
Lisa Pritchard	The Head	**166**	**Lisa.pritchard@**
Andrew Griffiths	Director of Senior School	**161**	**Andrew.griffiths@**
Matthew Robinson	Deputy Director Lower School	**153**	**Matthew.robinson@**
Toni van De Linder	Deputy Director Upper School	**146**	**Toni.vanderlinde@**
Wendy Williams	Designated Safeguarding Governor		**Wendy.williams@**
Eleanor Farncombe	'Shadow/Deputy' Designated Safeguarding Governor		**Eleanor.farncombe@**
Stephen Anthony	Chair of Governors		**stephen.anthony@**
Caroline Thomas	School Based Counsellor		**Caroline.thomas@**

Safeguarding in Education March 2026

Safeguarding contacts			
CAMHS	Call for advice, general information and mental health crisis presentations in children under 18 years	01633 749 519	
Concerns regarding a practitioner	Local Authority Designated Officer for Child Protection (LADO), Mike Portlock **N.B: In the event of any safeguarding concerns regarding staff/volunteers, contact the Education Safeguarding Officers or the LADO for advice before taking any action**	01633 656671	**QualityAssuranceDuty@newport.gov.uk** lado@newport.gov.uk
CP Duty desk	Immediate concerns or queries for children open to CP teams	01633 851448 CP Duty Desk number is **01633 839915**. This number is required for cases open on a CASP or CPR	CPFST.duty@newport.gov.uk
DCT Duty desk	Disabled Children's Team	01633 414745	disabled.children@newport.gov.uk
Families First	Support for children & families via SPACE referral. Consent needed	SPACE-Well being Co-ordinator, Joanne	Families.1st@newport.gov.uk

		Wood on 01633 235294	
General Safeguarding queries	**Nicola Davies**, Education Safeguarding Manager (Monday to Wednesday) **Sarah Todd**, Contextual Safeguarding Lead (Thursday & Friday) Jenny Caddy/Lauren Twamley (Education Safeguarding Support Officers) Updates on DTRs and children open to Children's Services		nic.davies@newport.gov.uk sarahl.todd@newport.gov.uk education.safeguarding@newport.gov.uk
Looked After Children education team	Support and advice for Looked After Children	01633 210257	Wendy.hoskins@newport.gov.uk
Pathway teams	Children Looked After teams	01633 210055	pathway.service@newport.gov.uk
Prevent training/queries	For any Prevent enquiries contact Jane Harvey, Connected Communities Manager Online training can be accessed here E-learning		Jane.harvey@newport.gov.uk
Preventions team	Advice and support for safeguarding and wellbeing concerns for children & families		Preventions@newport.gov.uk
Youth Justice Service	Advice and support for children at risk of/exposed to exploitation and/or anti-social and offending behaviour. PASS referral, consent needed	01633 414800 Request YJS Duty Manager	YJSBusinessSupport@newport.gov.uk

Torfaen Children and Family Services	01495 762200
Cardiff Children and Family Services	03000133133

Blaenau Gwent Children and Family Services	01495 311556
Monmouth Children and Family Services	01291 635669
NSPCC/Home Office Child Abuse whistleblowing helpline	0800 028 0285
NSPCC Support Line for Potential Victims of Sexual Harassment and Abuse in Educational settings	0800 136 663

In addition to the statuary framework, local and government guidance, we also utilise advice from the NSPCC

App and website reviews:

The following website can be used to review an app that a child might request from you or download themselves. It also reviews websites that they might visit or want to. The apps and sites are reviewed by parents and give useful feedback. Discussing their appropriateness with your child or children is excellent practice:
www.commonsensemedia.org

The NSPCC has an online app for Childline:
https://www.nspcc.org.uk/what-we-do/news-opinion/childline-launches-new-app/

CEOP - this useful video is a parental guide to managing Online Safety at home.
https://youtu.be/nQ7TYRYoF4M

Other useful contacts:

Your Doctor – Your GP can help with health-related problems, as can the health visitor.

The Child Exploitation and Online Protection Centre (CEOP) is dedicated to eradicating the sexual abuse of children. They offer advice and help to keep children and young people safe especially online. The web address for CEOP is www.ceop.police.uk and has dedicated sections for parents and carers as well as children and young people.

The Amber Project provides help and support to young people (14-25) who have experience of self-harm. They are local and offer help in a number of different ways including counselling, Friday evening workshops, theatre workshops, and informal support.
The Amber Project - Church Army

Barnardo's Cymru – provides 88 services across the country working with vulnerable children, young people, families and communities, helping them to build a better future. Every Barnardo's service is different

but each believes in the potential in every child and young person, no matter who they are, what they have done or what they have been through.
What we do | Barnardo's (barnardos.org.uk)

Live Fear Free – provides help and advice to anyone experiencing domestic abuse or sexual violence; anyone who knows someone who needs help; practitioners seeking professional advice. They can be contacted on 0808 80 10 800 24 hours a day 7 days a week. There is also a text service – 07860077333 and an email service info@livefearfreehelpline.wales which are both available 24hours a day 7 days a week.

R.I.S.E - provides support to women and their children who have experienced all forms of VAWDASV, in particular Domestic and Sexual Violence. Freedom from domestic abuse | RISE (riseuk.org.uk)
Helpline number is 01273 622 822 - Monday and Tuesday mornings, 9.30 - 12.30pm and Wednesday 5-7pm.

Ar Trac - Ar Trac supports children and young people (5-16) who have experienced or witnessed domestic abuse and who are exhibiting difficulties with their family and peer relationships. Ar Trac - Calan DVS - Providing Sanctuary, Inspiring change.

National Society for the Protection of Children – The NSPCC protects children across the UK. They run a wide range of services for both children and adults, including national helplines and local projects. www.nspcc.org.uk
https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/share-aware/

Meic – an advocacy, information and advice helpline for children and young people in Wales. If your life is in a bit of a tangle or you have a problem and need to speak to or contact someone, MEIC is for you. Find out more about MEIC here www.meiccymru.org You can talk to Meic 24/7 by telephone, text message and an instant chat service online.

Young Minds – can offer children advice if you are feeling low or worried. YoungMinds is the UK's leading charity committed to improving the emotional well-being and mental health of children and young people. They also provide expert knowledge to professionals/practitioners, parents and young people through our Parents' Helpline, online resources, training and development, and outreach work. www.youngminds.org.uk

Beat – help with eating disorders Get information and support - Beat (beateatingdisorders.org.uk)

Internetmatters.org – A not-for-profit organisation that has a simple purpose – to help keep children safe in the digital world. www.internetmatters.org

Shore Space - Home - Shore (shorespace.org.uk) – a safe space for teenagers worried about sexual behaviour

Lucy Faithfull Foundation Wales - Stop It Now – preventing child sexual abuse.

Report Remove | Childline – Report Remove helps young people under 18 in the UK to confidentially report sexual images and videos of themselves and remove them from the

- Welsh Women's Aid 08088010800 offers training and support for children and young people to promote healthy relationships via STAR programme and for sixth form students via it's Bystander Intervention Programme

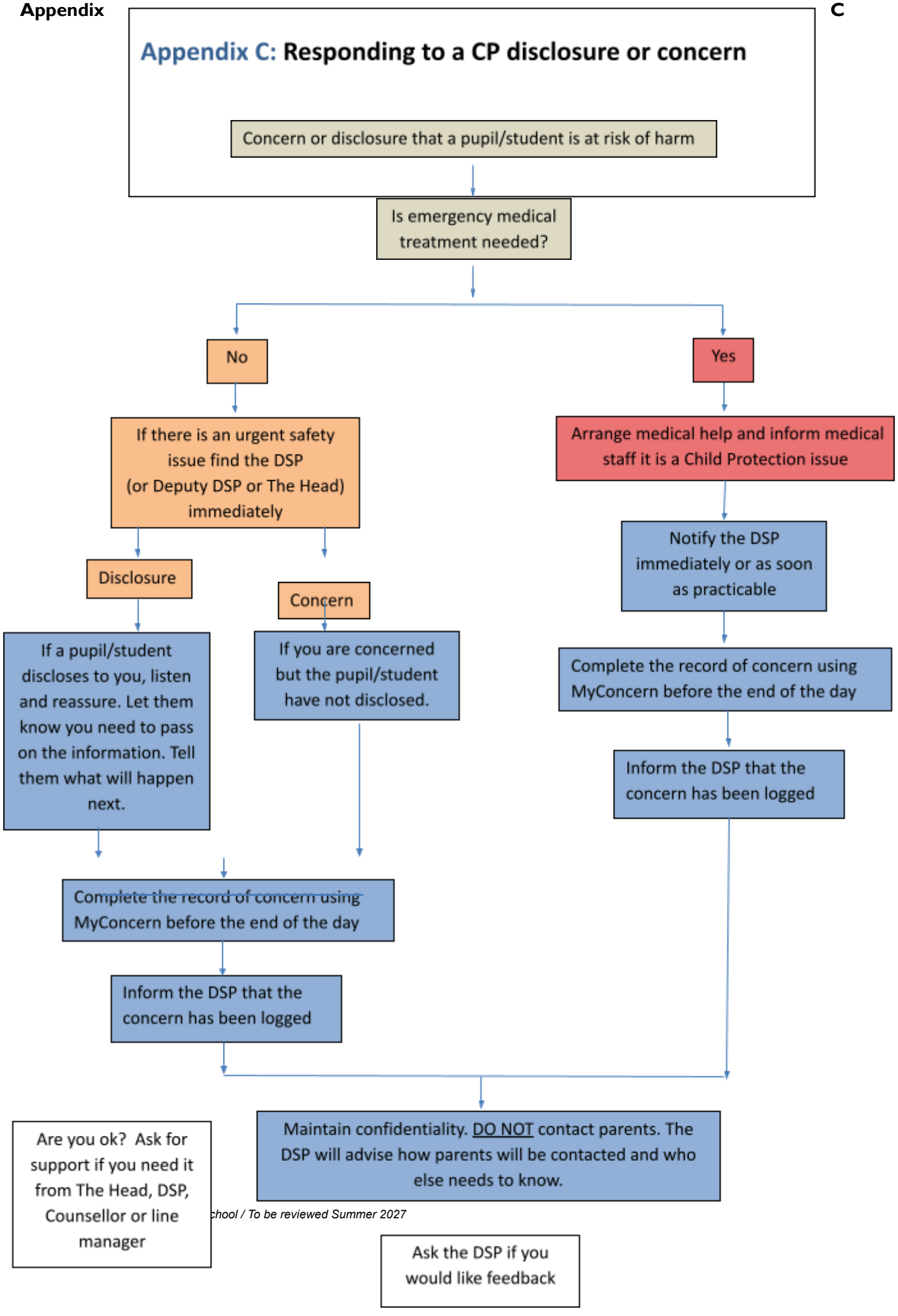
- Report Abuse in Education helpline is a dedicated helpline for children and young people who have experienced sexual harassment or abuse at school, and for worried adults and professionals that need support and guidance. 0800 136 663 help@nspcc.org.uk

Signposting for Suicide Prevention, Intervention and Postvention as referred to in Section 5.11

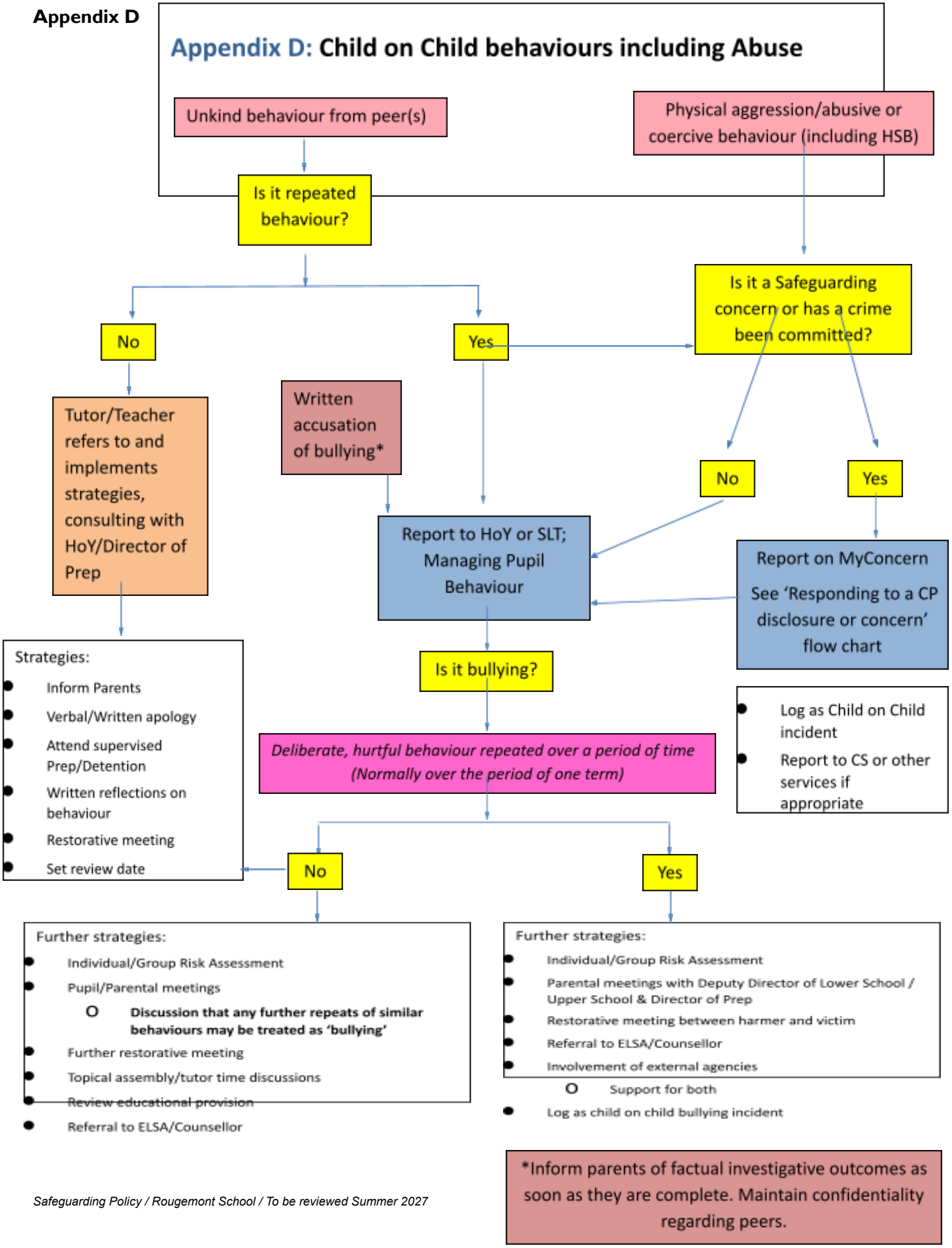
Agency	**Telephone**	**Website**
Childline	0800 1111	https://www.childline.org.uk
The Samaritans	*116123* Phone lines open 24 hours every day, 365 days a year. Local branch at 43 Stow Hill, Newport, NP20 1JH, is open for visitors everyday 8am-10pm.	https://www.samaritans.org
Young Minds (Parents)	0808 802 5544 Sms: text YM to 85258	https://youngminds.org.uk
Charlie Waller Memorial Trust		https://www.cwmt.org.uk
Stay Alive app		

Appendix C

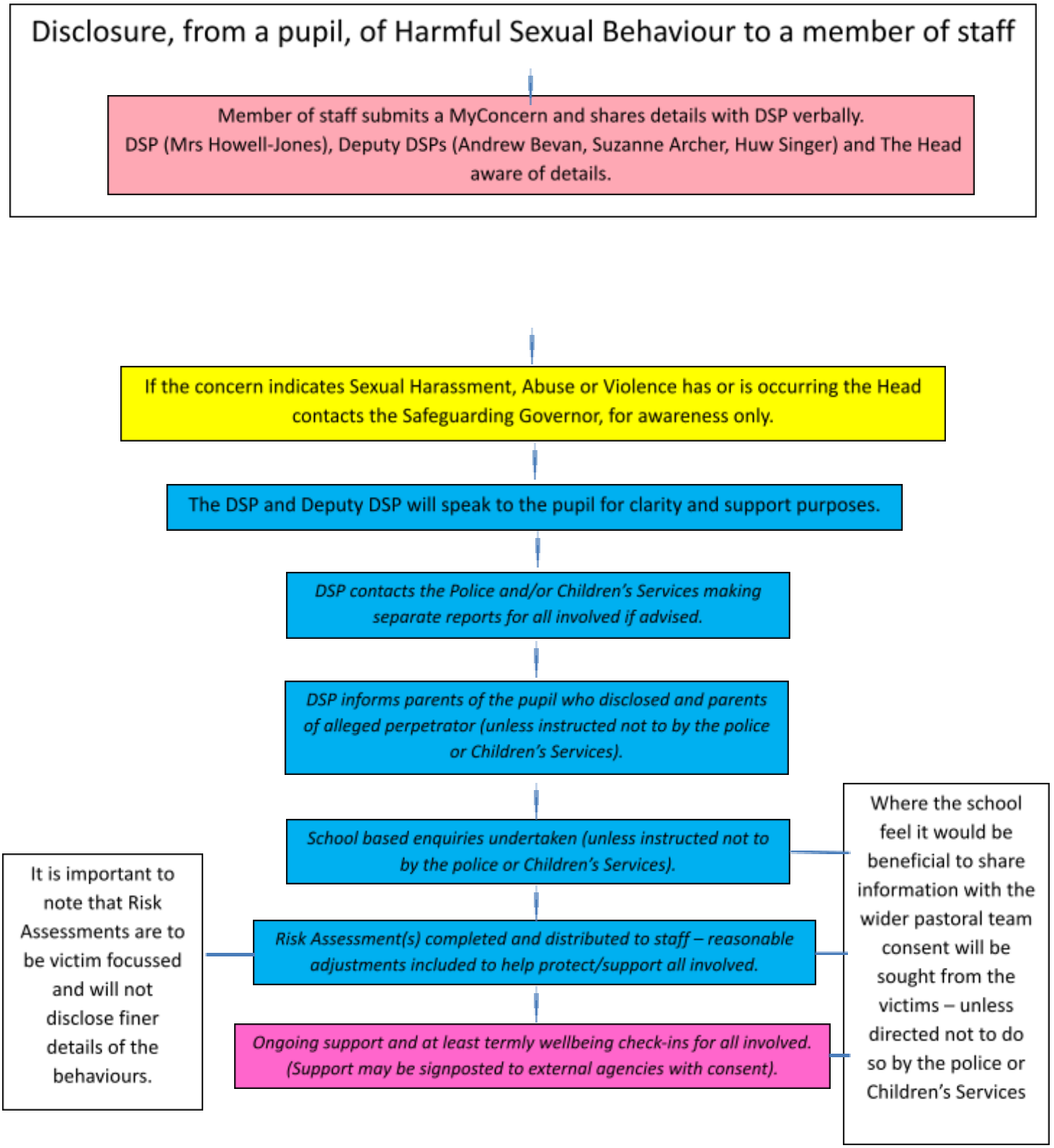
Appendix C: Responding to a CP disclosure or concern



Appendix D


Appendix D: Child on Child behaviours including Abuse
Unkind behaviour from peer(s)
Physical aggression/abusive or coercive behaviour (including HSB)
Is it repeated behaviour?
Is it a Safeguarding concern or has a crime been committed?
No
Yes
No
Yes
Tutor/Teacher refers to and implements strategies, consulting with HoY/Director of Prep
Written accusation of bullying*
Report to HoY or SLT; Managing Pupil Behaviour
Report on MyConcern
See 'Responding to a CP disclosure or concern' flow chart
Strategies:
Inform Parents
Verbal/Written apology
Attend supervised Prep/Detention
Written reflections on behaviour
Restorative meeting
Set review date
Is it bullying?
Log as Child on Child incident
Report to CS or other services if appropriate
Deliberate, hurtful behaviour repeated over a period of time (Normally over the period of one term)
No
Yes
Further strategies:
Individual/Group Risk Assessment
Pupil/Parental meetings
Discussion that any further repeats of similar behaviours may be treated as 'bullying'
Further restorative meeting
Topical assembly/tutor time discussions
Review educational provision
Referral to ELSA/Counsellor
Further strategies:
Individual/Group Risk Assessment
Parental meetings with Deputy Director of Lower School / Upper School & Director of Prep
Restorative meeting between harmer and victim
Referral to ELSA/Counsellor
Involvement of external agencies
Support for both
Log as child on child bullying incident
*Inform parents of factual investigative outcomes as soon as they are complete. Maintain confidentiality regarding peers.

Appendix E: Procedures regarding pupil disclosure of Child-on-Child Harmful Sexual Behaviour



Appendix F: Brook traffic light tool for identifying sexual behaviours

SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL

brook

www.brook.org.uk

Behaviours: age 0 to 5

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation,consensual activities and positive choices

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

Behaviours: age 5 to 9

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation,consensual activities and positive choices

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

Behaviours: age 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation,consensual activities and positive choices

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation,consensual activities and positive choices

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

Print date: 29/10/2014 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

Appendix G: Protecting your setting's images from AI manipulation and abuse: Guidance for education settings and organisations working with children and young people

https://d1xsi6mgo67kia.cloudfront.net/uploads/2026/05/Education-guidance-Protecting-your-settings-images-from-AI-manipulation-and-abuse.pdf

Appendix H: Safeguarding Adolescents from Exploitation (SAFE). Child Exploitation Screening Tool

This screening tool should be used by all professionals working with children aged 10+. Professionals may also decide it is appropriate to use the tool to screen younger children where all types of Child Exploitation is suspected (Emerging - Low/significant -Medium /experiencing - High).

This screening tool will help you focus on the specific indicators of all types of Child Exploitation and determine whether further investigations are needed. The tool could be used at any point Child Exploitation is considered a risk. An example of this is in discussion with the child, in supervision, discussions with parents and carers, and with other professionals.

Young Person's details

Child's Name:		**DoB:**	
Address:		**Home/mobile Phone:**	
GP Surgery:		**School/College:**	
Ethnicity		**Sexual Orientation (if known)**	
Religion		**Language spoken (Indicate first language)**	

Referrers Details

Name and job title of person completing:		**Date completed:**	
Organisation:		**Contact e-mail:** **Telephone:**	

Lead Agency Involvement

No Lead Agency	Early Help	Child in Need of Care and Support	Child Protection	Child Looked After - in or out of county placement?

Indicator	Suggested risk level	Yes/No	Possible
Health Domain **Physical Signs**			
Bruising / Unexplained Injuries - think about injuries caused through violence, A&E attendances Threat to life			☐
Change in Physical Appearance Example: dishevelled appearance or a sudden change in the way Child dresses, losing or gaining weight			☐
Sexually Transmitted Infections (STI's)			☐
Injuries - evidence of physical or sexual assault			☐
Pregnancy, termination or repeat testing for sexually transmitted infections			☐
Disclosure of sexual violence/assault even if followed by withdrawal of allegation. Examples: Sexual assault, rape, internally inserting drugs in rectum or vagina (Plugging), indecent images shared as part of initiation, revenge or punishment			☐
Notes			
Health Domain **Emotional Signs**			
Expressions of low emotional health and wellbeing			☐
Anger / Aggression			☐
Withdrawn			☐
Extreme Mood Changes - if other risks of CE are identified then the risk would increase			☐
Low self-esteem / self confidence			☐
Self-harm indicators and/or suicidal thoughts/attempts			☐
Disengaged from known adults and interests, an invincibility attitude or not caring about what happens to them			☐

Young person's sexuality increases their vulnerability as they feel unaccepted due to sexual orientation **Is the young person transitioning/historical sexual abuse?**			☐
Evidence of a Learning or physical disability			☐
Notes			

Material Signs			
Use of a mobile phone that causes concern/ Multiple mobile phones, including that of burner phones			☐
E- Safety - Secretive about mobile phone/more than one mobile phone Making/ receiving explicit videos/ sexting Late night excessive phone/ internet activity			☐
Has extra money/new items (Gifted electric scooter, bikes) /'gifts' that cannot legitimately be accounted for/received from unknown sources			☐
New clothing / Footwear which cannot be accounted for by parents/carers			☐
Young Person being found to have large amounts of drugs on them			☐
Have they been to hotels, Air B&B, have they got hotel cards or keys to unknown places, with unknown adults			☐
Notes			
Behavioural Signs			
Change in behaviour, such as secretive, anger, lifestyle, disruptive behaviour, violent behaviour			☐
Missing episode			☐

Persistently going missing from home or school and/or being found out of area. **Think about their presentation on return, dishevelled? Hungry?**			☐
Starting or increase drug use - cannabis, Class A, **Class B,**			☐
Starting or increased Alcohol use			☐
Staying out late without reasonable explanation			☐
Frequenting areas known for exploitation (including private dwellings) on more than one occasion			☐
Using sexual, gang, drug related or violent language you wouldn't expect them to know			☐
Increased use of internet- use of several media sites			☐
Young person has been coerced to take/share indecent images			☐
Arrested/Evidence of criminality			☐
Young person carrying / concealing weapons			☐
Change in education attendance/Change in education provider/Missing from education			☐
Absent from school / Non-school attendance			☐
Exclusion from school			☐
Glamorised view of criminality			☐
Entering / leaving vehicles driven by unknown adults / adults of concern			☐
described as out of control or as having risky behaviour by their family, carers or by practitioners			☐
Notes			

Family /Associate signs - vulnerability and risks

Parents / Carers not reporting young person missing			☐
Multiple or concerning contact (unknown adults / older young people)			☐
Young person feels indebted to an individual or group - drug debt			☐
Family or young person having to move or leave their home because of threats			☐
Associates known to be involved in criminality or Organised Crime Groups (OCG's)			☐
Living in a chaotic / dysfunctional household			☐
Relationship breakdown with family and or peers, sudden change of friendships			☐
Association with others who have been exploited			☐
Targeted threats to family / threats at home			☐
Absence of safe trusted adult			☐
Young Carer			☐
Young person has limited age appropriate friendships / struggles to maintain friendships			☐
Older 'relationship' with controlling adult.			☐
Association with older and/or risky peers			☐
Notes			
Other			
Services have not been able to engage with child			☐
Homeless / inappropriate accommodation (prompt)			☐
Notes			

Are Parents / Carers aware of these concerns?		☐	☐
Does the child have awareness of these concerns?		☐	☐

Does the young person consent to you sharing this information?		☐	☐
Does the parent consent to you sharing this information?		☐	☐

Please summarise the evidence using the VOLT model indicated from the tick boxes and detail why you ARE or ARE NOT proceeding with a referral.

Based on your risk and vulnerability identification please capture key information using the **Victim, offender, location, themes** (VOLT) mnemonic. Please bullet point information.

Victim (s)- Young person	
Offender (s)	
Locations (s)	
Theme (s) **These are places that children gravitate towards, e.g. hotels, eateries, shopping venues, particular transport hubs, addresses, children's care homes and youth clubs. What times are they attending these locations, how are they travelling to these venues, is the venue a 'go-to' place for when the child has experienced a missing episode?**	

Risk Category identified	**What next?**

If the screening tool identifies a risk of significant harm, and the young person is NOT open to Children Services you MUST make a referral. Do this by completing a DTR Form and submitting it along with this form into Children's Services through the Multi Agency Safeguarding Hub (MASH) in line with the duty to report under the Wales Safeguarding Procedures 2019.

Consent

Please be aware that appropriate consent is required before information is shared unless doing so may cause the child to suffer significant harm. If you are unsure, seek advice from your safeguarding lead, MASH social workers or the Early Help Gateway.

Appendix I: Intimate Care Guidance

We are aware that some learners may require assistance from members of staff for personal/intimate care, including toileting, either due to the age and developmental level of the child or as a result of disability or medical need.

The management of all children with medical or personal / intimate care needs is carefully planned. The child who requires intimate care is treated with respect at all times; the child's welfare and dignity are of paramount importance.

Definitions of Intimate and Personal Care

Intimate care can be defined as any care which involves washing, touching or carrying out a procedure to intimate personal areas which most people usually carry out themselves but some pupils are unable to do because of their young age or a physical condition. Intimate care tasks include: dressing and undressing (underwear), helping a child use the toilet, changing pants, cleaning, wiping or washing intimate parts of the body.

Personal Care may involve touching another person but it is less intimate and usually has the function of helping with personal presentation. This could include: feeding, administering oral medication, hair care, or help with dressing and undressing clothing, washing non-intimate body parts and prompting to go to the toilet.

Staff who administer intimate care should ensure that another adult is present, or when this is not possible the door to the toilet must be left open.

When attending to a child's medical or intimate care needs:

- The child will be supported to achieve the highest level of autonomy that is possible given their age and abilities.
- Staff will encourage each child to do as much for themselves as they can. This may mean, for example, giving the child responsibility for removing their clothes or washing themselves. Where a pupil cannot be independent in cleaning themselves up or attending to a medical issue, staff will support them appropriately. Where the pupil is of an appropriate age and level of understanding permission should be sought before starting any intimate care or first aid procedure. The pupil's dignity must always be considered where contact of a more intimate nature is required (e.g. assisting with toileting or the removal of wet or soiled clothing.)
- Minor first aid procedures which require removal of clothing (e.g. a scraped knee): Two adults will accompany a child to an area where their privacy is protected to attend to their needs. Where possible, the child will be asked to pull down their own trousers or tights to show the adults where they are hurt.
- Accurate records should be kept when a child requires assistance with intimate care; these can be brief but should, as a minimum**, include full date, times and details of care needed. It should be clear who was present in every case**. These records will be kept in the child's classroom.
- Adults who assist pupils with intimate care are employees of the school, not students or volunteers, and therefore have the usual range of safer recruitment checks.

- Upon starting school, parents are made aware of our practice involving caring for children when they need to change their clothes or receive first aid.
- Staff should wear a disposable apron and gloves when attending to children's needs, each classroom/year group should have these readily available and accessible.
- Soiled materials used for cleaning children must be disposed of following agreed procedures. A nappy bin should be available within the Infant Building toilets (contract cleaners remove the waste on a weekly basis).
- Care should be taken when wrapping children's clothes to be sent home – this should be 'double bagged'.
- A Personal Care form must be filled in for each incident and parents should be informed at the end of day. However, if a pupil is unwell and required intimate care then parents will be telephoned and asked to collect their child (e.g. in the case of diarrhoea)

Staff are asked to report and record any unusual emotional or behavioural response by the child. If the person providing intimate care observes any unusual markings, discolouration or swelling on the child's body this should be reported immediately to the DSP.

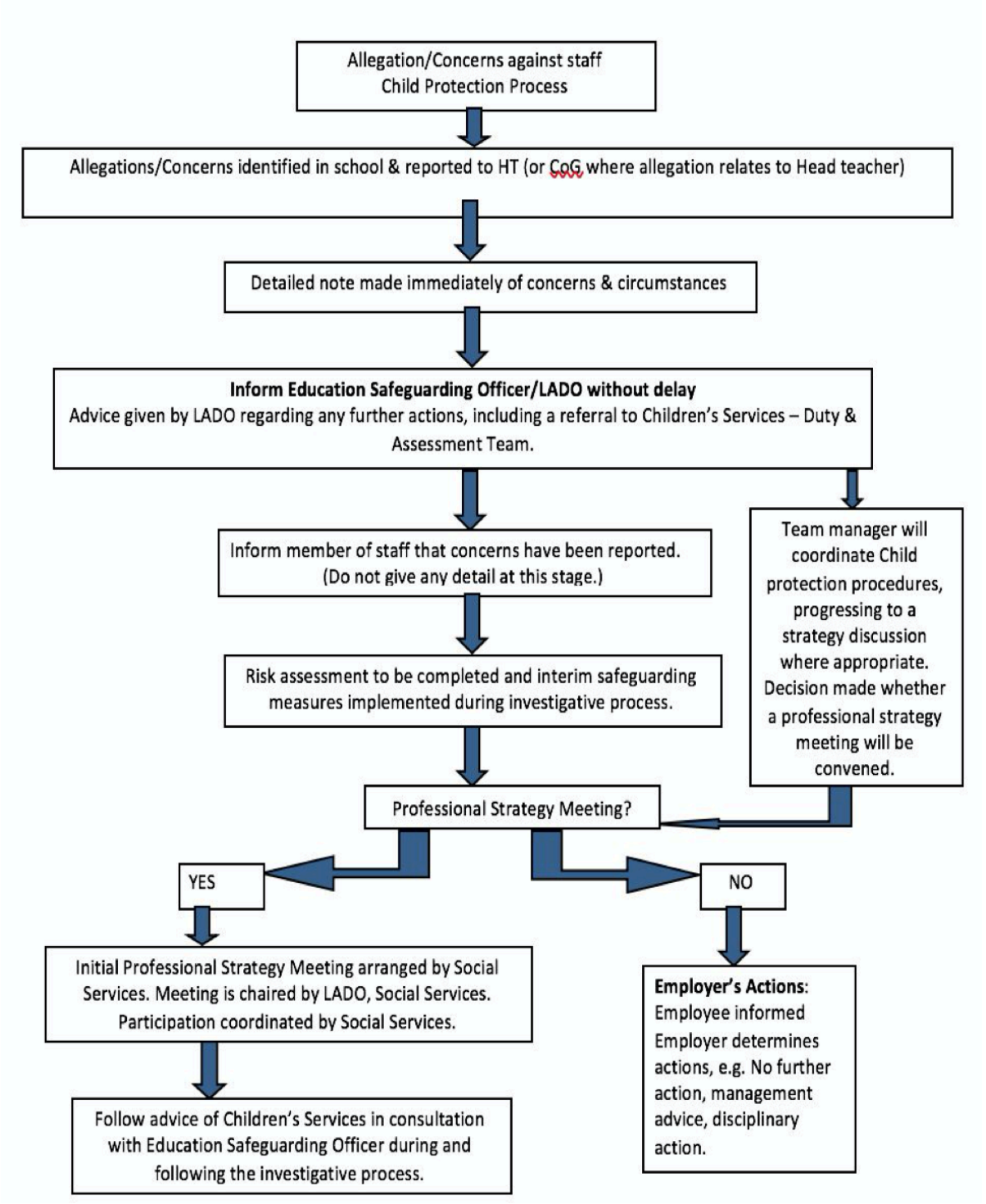
If during the intimate care of a child a member of staff accidentally hurts them, or the child misunderstands or misinterprets something, the member of staff will reassure the child and inform the Deputy Director Infants, Director of Prep and the DSP. The incident will be recorded on the personal care form.

If a child is unhappy or anxious about the care being provided, the issue will be addressed to ensure that we continually meet a child's needs. If a child refuses to be cleaned, then the parents or carers will be phoned and asked to collect the child who may return to school once cleaned.

Appendix J: Professional Allegations & Concerns Flow Diagram

This Flowchart should be used as a brief checklist of procedure for allegations/concerns against a professional in school.

Wales Safeguarding Procedures Section 5 is followed.



Appendix K: Safeguarding of Sixth Form Students Aged 18 and Over Appendix Statement October 2026

This statement applies to all Sixth Form students aged 18 or over and students who turn 18 whilst enrolled at the School.

The School will:

1. Create a safe, respectful, and inclusive environment.
2. Promote student wellbeing and resilience.
3. Respect the rights and autonomy of adult students
4. Provide support without being unnecessarily intrusive.
5. Take action where there is a risk of significant harm.
6. Work collaboratively with external agencies where appropriate.
7. Maintain clear reporting procedures for safeguarding concerns.
8. Encourage students to seek help and support when needed.

The Designated Safeguarding Person remains responsible for safeguarding concerns involving students aged 18 and over. Staff will continue to raise any concerns about sixth form students over the age of 18 via MyConcern.

The School recognises that learners aged 18 and over are legally adults and generally have the right to make decisions about their personal information and access to support services.

Where possible, the School will:

- Seek the student's consent before sharing personal information.
- Encourage students to involve parents or carers where appropriate.
- Respect confidentiality.

However, information may be shared without consent where:

- There is a risk of significant harm.
- There is a safeguarding concern affecting the individual or others.
- There is a legal duty to share information.
- A crime may have been committed.
- An adult at risk requires protection.Information sharing decisions will always be proportionate, necessary, and recorded.

Educational and Wellbeing Consent From for Students Aged 18 and over

I, _____, confirm that I am happy for my parents to continue to receive copies of my school reports and for Rougemont School to maintain appropriate communication with them regarding my educational progress, wellbeing, and future pathways, in order to support my continued success during my Sixth Form studies.

I understand that, as an adult member of the school community, I have a responsibility to model appropriate behaviour and maintain appropriate boundaries with younger pupils. I acknowledge that I should avoid unnecessary contact with younger students and use facilities designated for Sixth Form students wherever possible, including the Sixth Form toilets and social areas.

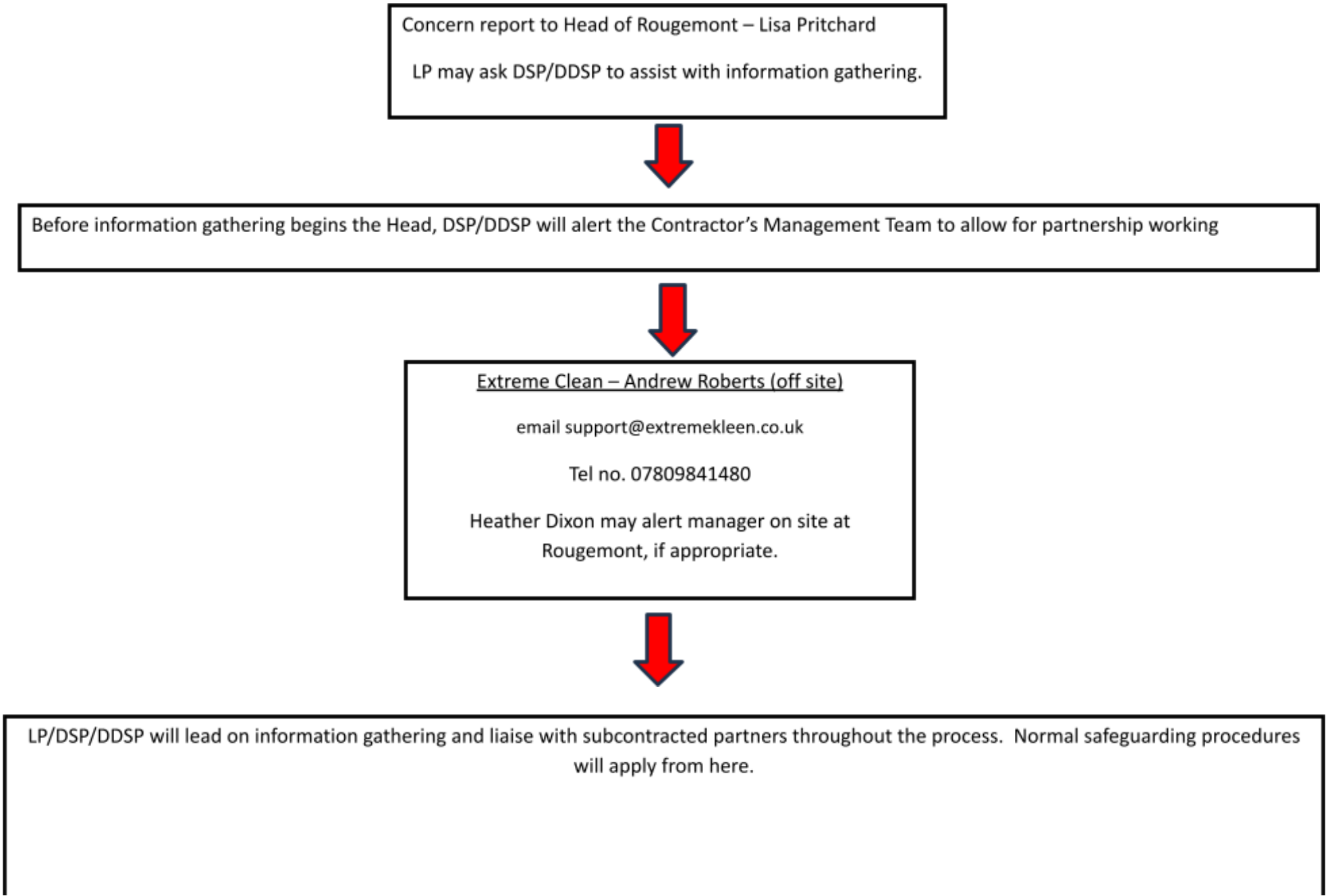
I further understand that I should follow all school policies relating to safeguarding, conduct, and the use of shared spaces, and that any interactions with younger pupils should be appropriate, respectful, and consistent with the expectations placed upon Sixth Form students and adult members of the school community.

I understand that any concerns regarding my conduct, welfare, or safeguarding matters may be discussed with my parents where the school considers this necessary to protect my wellbeing or the wellbeing of others.

By signing below, I confirm my understanding of these expectations and my commitment to upholding them at all times whilst representing Rougemont School.

Student Name:

Student Signature: _____

Date: _____

Appendix L: Safeguarding Concerns Involving Sub-Contracted Members of Staff