



Safeguarding and Child Protection Policy and Procedure

Written	November 2025
Author	Sam Thomas
Role	Headteacher
Last Review	September 2026
Review Date	September 2027

Section	Content	Page Number
1.	Introduction	3
2.	Statutory Framework for Safeguarding in Education	4
3.	United Nations Convention on the Rights of the Child (UNCRC)	5
4.	Policy statement, aims and objectives	6
5.	Terminology	7
6.	Definitions / Types of Abuse	7
7.	Context	9
8.	Roles and responsibilities	9
9.	Good practice guidelines	12
10.	Abuse of trust	13
11.	Pupils who are particularly vulnerable	13
12.	Training	14
13.	Safer Recruitment	16
14.	Prevention	17
15.	Presentation	18
16.	Dealing with Disclosure's	19
17.	Recording	19
18.	Procedure to deal with allegations (against pupils or staff)	20
19.	If you have concerns about a colleague	21
20.	Staff who are the subject of an allegation	21
21.	Record keeping in respect of allegations against staff / carers.	22
22.	Dealing with allegations of Peer Abuse / Exploitation	26
23.	Confidentiality	26
24.	Female Genital Mutilation (FGM)	28
25.	Forced marriage.	28
26.	Prevent Programme	29
27.	Sharing nudes and semi-nudes	29
28.	ALN	31
29.	Extended school and off-site arrangements	31
30.	Risk Assessments	31
31.	Photography and images	32
32.	e-Safety	32
33.	Reporting directly to Child Protection agencies	33
34.	Key Safeguarding Contacts	34
35.	Monitoring and Review	36
Appendix		
Appendix 1	Code of ethical practice for school staff	37
Appendix 2	Whistle blowing code for issues relating to pupils	38
Appendix 3	Recognition and Signs of Abuse	42
Appendix 4	Procedure for dealing with Peer-on-peer abuse.	44
Appendix 5	NSPCC guidance on child protection records retention	45
Appendix 6	Procedures for dealing with incidents of sexting	46
	Cross Reference	49

1. Introduction

Ysgol Y Rhos is an Independent School operating within Unique Care Homes Ltd who are the proprietors.

Ysgol Y Rhos is an independent school providing specialist education to boys and girls aged 8 to 16 years with social, emotional, and behavioural needs (SEBN) and are Children who are looked after (CWLA). The school specifically caters for pupils who, in the past, may have experienced significant adverse childhood experiences (ACEs), leading to a range of complex interpersonal, emotional, and behavioural issues.

Unique Care Homes Ltd aspires to deliver an outstanding integrated model of education, therapy, and therapeutic care to the pupils.

Our core safeguarding principles are:

- It is the school's responsibility to safeguard and promote the welfare of pupils.
- A child centered approach: for services to be effective they should be based on a clear understanding of the needs and views of pupils .
- Pupils who are and who feel safe make more successful pupils.
- Pupils will feel safe and become successful pupils where the school has a strong ethos of caring, openness and mutual respect.
- Pupils are best kept safe when professionals work effectively together and share responsibility for protective action.
- Where there are concerns about a pupil's safety, unconditional confidentiality cannot be guaranteed and should not be offered. When a pupil has suffered abuse, neglect, or exploitation in the past, information on this should be shared only on a 'need to know' basis.
- Teachers, teaching support, and carers should be proactive and take positive steps to inform pupils of their rights to safety and protection and the options available to express their fears or concerns.
- When pupils make allegations of abuse or neglect, or exploitation, they should always be listened to, have their concerns taken seriously, and where appropriate, thoroughly investigated.
- All teaching, teaching support, and carers charged with the responsibility of safeguarding children have a right to training and appropriate levels of supervision and support.
- All staff ensure that children are growing up in the circumstances consistent with the provision of safe and effective care.

- Safeguarding is paramount in all practices at our school. Throughout the curriculum the safety and safeguarding of our pupils is addressed. This can be done in focused sessions around IT safety and safety in the community as well as in PSE lessons around drug abuse and gang related topics. Safeguarding themes and topics can be seen throughout the school being delivered across the curriculum.

2. Statutory Framework for Safeguarding in Education

The standards prescribed regarding safeguarding of pupils in education are set out in the Independent School Standards (Wales) Regulations 2024 made under section 175 of the Education Act 2002. These relate to the following legislation:

- The Children Act 1989;
- Section 175 of the Education Act 2002 (local authorities, governing bodies of maintained schools and institutions in the further education sector).
- The Independent Schools Standards Wales Regulations 2024
- Section 28 of the Children Act 2004 (other agencies).
- Social Services and Well-Being (Wales) Act 2014
- Wales Safeguarding Procedures, including Section 5 as updated June 2026".
- Keeping learners safe: the role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002 (Guidance no. 283/2022)".Children (Abolition of Defence of Reasonable Punishment) (Wales) Act 2020
- The Well-being of Future Generations (Wales) Act 2015
- The Counter-Terrorism and Security Act 2015 (Prevent Duty in Wales)
- Working Together to Safeguard People (Wales) 2022.
- Rights of Children and Young Persons (Wales) Measure 2011

[

3. United Nations Convention on the Rights of the Child (UNCRC)

Our safeguarding policy has also been written with due regard for the UNCRC demonstrating our commitment to the promotion and protection of children's rights ensuring that the voice, welfare and dignity of all our pupils is paramount to the work that we do. Our safeguarding policy encompasses the UNCRC in the following ways.

Article	Theme	Links
Article 3	Best interests of the child	The guiding principle behind all safeguarding responses is that all decisions and actions are made in the best interest of the child.

Article 6	Right to life, survival and development	Safeguarding ensures every child's right to life, protection from harm, and support for their healthy development (physical, mental, emotional).
Article 12	Right to be heard and taken seriously	Children's voices are listened to, taken seriously, and acted upon, especially in disclosures or when expressing worries about safety or wellbeing.
Article 19	Protection from all forms of violence, abuse, neglect and maltreatment	All appropriate measures will be taken to protect children from abuse (physical, emotional, sexual, neglect) and to respond effectively when concerns arise.
Article 20	Protection for children deprived of their family environment	All pupils at Ysgol Y Rhos are CWLA. Our safeguarding approach has due consideration for the particular vulnerabilities that this may incur.
Article 23	Rights of Children with disabilities	Children with disabilities or additional learning needs (ALN) are safeguarded equally and given additional support where required.
Article 24	Right to health and health services	Children's physical and mental health needs are recognised and supported, including access to counselling, mental health, and wellbeing services.
Article 28	Right to education	No child is denied education due to neglect, exclusion, or unsafe conditions.
Article 29	Aims of education	Respect for human rights, equality, and personal dignity all underpin the school's ethos on safeguarding, mutual respect, and anti-bullying.
Article 34	Protection from sexual exploitation and abuse	This policy sets out procedures to prevent and respond to sexual abuse, exploitation, grooming, or online risks.
Article 35	Prevention of abduction, sale or trafficking	This policy states outlines Ysgol Y Rhos's commitment to security, vetting, and supervision of staff, volunteers, and visitors helping to protect children from exploitation or trafficking.
Article 36	Protection for all other forms of exploitation	This policy also includes how the school will protect pupils from child labour, online exploitation, criminal exploitation (CCE), or county lines activity.
Article 39	Recovery and reintegration	Support for children who have experienced abuse or trauma, including access to therapeutic help, pastoral care, and reintegration into safe education.
Article 42	Awareness of rights	Help children learn about their rights, including the right to be safe and to be heard, through curriculum and pastoral programmes.

4. Policy statement, aims and objectives

The whole school recognises a moral and statutory responsibility to safeguard and promote the welfare of all pupils. Staff endeavour to provide a safe and welcoming environment where pupils are respected and valued. All staff are alert to the signs of abuse, neglect and exploitation and follow the school procedures to ensure that pupils receive effective support, protection, and justice.

The procedures contained in this policy apply to all education and care staff working within the school and are consistent with those of Unique Care Homes Ltd and the North Wales Safeguarding Board.

Aims

- To ensure that the pupils educated, at our school are properly protected and that their welfare is promoted.

- To ensure that our policy meets the expectations of Welsh Government circular 007/2013 'Safeguarding Children in Education: The role of local authorities and governing bodies under the Education Act 2002' and the non-statutory guidance 009/2014 'Safeguarding Children in Education: handling allegations of abuse against teachers and other staff' and is compliant with The Wales Safeguarding Procedures for Children and Adults at Risk of Abuse and neglect 2019) as well as 'Keeping Pupils Safe 283/2022'. This policy furthermore takes guidance from Working Together to Safeguard Children, Keeping Children Safe in Education, 'Sexting in schools and colleges 2016'.
- To ensure that our school complies with the policies and procedures of the North Wales Safeguarding Children Board.

Objectives

- To ensure that the safety and welfare of pupils looked after or educated at our school is paramount.
- To clarify for staff at all levels their responsibilities in relation to child abuse and to ensure that concerns/allegations are effectively managed.
- To reassure teachers, teaching support and carers, those with parental responsibility and Placing Authorities that our School takes the issue of child protection seriously and will always respond quickly and positively to keep pupils safe.
- To ensure that all pupils educated at our school are aware of their unconditional right to be kept safe and free from harm.

5. Terminology

Safeguarding and promoting the welfare of pupils refers to the process of protecting them from abuse or neglect, preventing the impairment of their health or development, ensuring that they grow up in circumstances consistent with the provision of safe, effective and nurturing care and undertaking that role so as to enable pupils to have optimum life chances and to enter adulthood successfully.

Child Protection refers to the processes undertaken to meet statutory obligations laid out in the various Legislation, National Policies and associated guidance in respect of those pupils who have been identified as suffering or being at risk of suffering harm.

Staff refers to all those working for or on behalf of the school, full time, or part time, in either a paid or voluntary capacity.

Child refers to all Pupils who have not yet reached their 18th birthday.

Parent refers to birth parents and other adults who are in a parenting role, for example corporate parents, step parents, foster carers and adoptive parents.

6. Definitions / Types of Abuse

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult/s, or another child/children.

Physical Abuse

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet or electronic communication). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Criminal Exploitation

"County line exploitation can affect any child or young person (male or female) under the age of 18 years; any vulnerable adult over the age of 18 years; can involve force

and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. That it can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.”

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Provide access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

A pupil is deemed to have been abused or neglected if they have suffered significant harm due to their experiences.

The Children Act does not define significant but refers to it as being 'considerable,' 'noteworthy' or 'important.' It defines harm as ill-treatment (physical, sexual, emotional abuse and neglect) or impairment of health (physical or mental) and/or development (physical, emotional, intellectual, social, or behavioural).

Sexual Exploitation (definition developed by the National Working Group for Sexually Exploited Children and Young People (N.W.G.)

Sexual Exploitation of children and pupils under 18 involves exploitative situations, contexts, and relationships where pupils (or a third person or persons) receive 'something' (for example, food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing sexual activities and/or another performing sexual activities on them. Child sexual exploitation can occur through use of technology without the child's immediate recognition, for example persuasion to post sexual images on the internet/mobile phone with no immediate payment or gain. In all cases those exploiting the child/pupil have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or pupil's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

7. Context

Section 175 of the Education Act 2002 requires local education authorities to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of pupils.

The Independent Schools Standards Wales Regulations 2024 require proprietors of independent schools to have arrangements to safeguard and promote the welfare of children who are pupils at their schools.

Research suggests that more than 10 per cent of children will suffer some form of abuse.

Due to their day-to-day contact with pupils' school staff are uniquely placed to observe changes in behaviour and to recognise the outward signs of abuse. Pupils in this school may also turn to a trusted adult when they are in distress or at risk. It is vital that all school staff are alert to the signs of neglect and abuse and understand the local procedures for reporting and acting upon their concerns.

8. Roles and responsibilities

All schools must nominate a senior member of staff to coordinate Child Protection arrangements and this person is named in this policy guidance.

The **Designated Safeguarding Person (DSP)** for safeguarding and Child Protection at Ysgol y Rhos is Sam Thomas

The **Deputy Designated Safeguarding Person (DDSP)** is Fred Smith

The DSP's and DDSP's role is to take lead responsibility for safeguarding and child protection matters in the school.

Their responsibilities are as follows:

- Make sure they know how to recognise and identify the signs of abuse, neglect, and other types of harm, irrespective of whether it is online or offline, and know when it is appropriate to make a report to the local authority (or police where the child/children are in immediate danger).
- Provide support to staff members to carry out their safeguarding duties.
- Maintain an overview of safeguarding within the school.
- Be the first point of contact for parents/carers, pupils, teaching and non-teaching staff and external agencies in all matters of child protection (except where an allegation of abuse involves a member of staff)
- Work with the Senior Management Team to review and update the school's safeguarding and child protection policy.
- Co-ordinate the child protection and safeguarding procedures in the school and ensure sufficient account of the nature and age range of the school and its pupils.
- Manage referrals of all cases of suspected abuse to the Local Authority Children's Social Services and other external agencies, such as the Disclosure and Barring Service, EWC and Police, as appropriate

- Maintain an ongoing training program for all school employees from induction and throughout their employment.
- Help promote educational outcomes by sharing the appropriate information about welfare, safeguarding and child protection issues with teachers and other members of the school team as appropriate.
- Monitor the keeping, confidentiality, and storage of records in relation to child protection.
- Liaise closely with the individual in charge of managing the local authorities Safeguarding Allegations Management process and other external agencies as appropriate.
- MUST liaise with the Senior Management Team to inform them of issues such as ongoing police or safeguarding investigations (unless the allegation involves them).
- Discuss any potential safeguarding issues in line with Local Authority Children's Social Services procedures.
- Ensure that parents/carers see copies of the child safeguarding policy.
- Keep parents informed of actions to be taken under these procedures in relation to their child.
- Monitor records of pupils in the school who are subject to a child protection plan to ensure that this is maintained and updated as notification is received.
- Liaise with other professionals to ensure that children who are subject to child protection plans and/or social workers are monitored.
- Where appropriate, to take part in child protection conferences or reviews/core groups.
- Inform the Local Authority Children's Social Services in writing when a child who is subject to a child protection plan moves to another school and to inform the new school of the child protection plan as advised by the Children's Social Care department.
- Monitor the effectiveness of the school's safeguarding policies and procedures and should ensure the education setting's safeguarding policy is updated and reviewed annually, and work with the Senior Management Team regarding this.
- Be involved in monitoring the effectiveness of other school policies as required, to ensure there is consistency and coherence in the way the school effectively safeguards their children, as part of tracking 'the golden thread' of safeguarding throughout the school
- Consider how safeguarding more widely can be addressed and ensure preventative measures are adopted in the education setting.
- Ensure, together with the Senior Management Team that all staff receive appropriate training to help them understand the risk of radicalisation and what to do if they have any concerns that a child may be at risk of being drawn into terrorism, radicalisation and/or extremism.
- Keep and maintain records and attendance of staff training on child protection, PREVENT and safer recruitment procedures.
- Ensure that, where a child leaves the school, the child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file ensuring secure transit and obtain confirmation of

receipt.

- Complete the Keeping Pupils Safe: Safeguarding Audit Tool, Annex 3, annually Keeping pupils safe | GOV.WALES
- In the rare circumstance that the DSP or DDSP are unavailable, all their duties will be carried out by the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos, Sion Wyn Thomas. For out of hours/out of term activities, another designated member of The Senior Management Team will be the first port-of-call.
- Ultimate lead responsibility for safeguarding and child protection remains with the DSP and DDSP. This responsibility should not be delegated. Full details of the role can be found in Keeping Pupils Safe (283/2022) paragraph 2.15.
- The DSP and/or DDSP will attend strategy meetings if the meeting is in regard to a pupil or a teacher below their level in the organisational structure.
- If the meeting concerns an individual above the level of the DSP or DDSP in the organisational structure then it will be the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos that attends. If the meeting is concerning the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos, Sion Wyn Thomas then it will be Ysgol Y Rhos responsible individual, Cartin Jones.

Unique Care Homes Ltd ensures that the school has:

- At least one appointed lead for safeguarding and Child Protection that is a member of the senior management and who has undertaken the approved North Wales Safeguarding Board training in inter-agency working, in addition to basic Child Protection training.
- A Child Protection policy and procedures that are consistent with North Wales Safeguarding Board requirements, reviewed regularly and made available to parents/carers on request.
- Procedures for dealing with allegations of abuse made against members of staff including allegations made against the head teacher.
- Safer recruitment procedures that include the requirement for appropriate checks in line with national guidance. Every member of staff, working in Ysgol y Rhos, must provide a current DBS (Disclosure and Barring Service) and ensure that it is kept up to date throughout their term of employment.
- A training strategy that ensures all staff, including the headteacher, receive the appropriate level of Child Protection training for their role and responsibilities in line with the National Safeguarding Training Learning and Development Standards and will receive refresher at the required frequency.
- Arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for Child Protection.
- Unique Care Homes nominates an officer normally the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos to be responsible for liaising with

relevant local authorities and other agencies in the event of an allegation being made by a pupil against the head teacher.

The Headteacher:

- Ensures that the safeguarding and Child Protection policy and procedures are implemented and followed by all staff.
- Allocates sufficient time and resources to enable the DSP and deputy to carry out their roles effectively, including the assessment of Pupils and attendance at strategy discussions and other necessary meetings.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures.
- Ensures that pupil's safety and welfare is addressed through the curriculum.

9. Good practice guidelines

To meet and maintain our responsibilities towards pupils, the school community agrees to the following standards of good practice:

- Treating all pupils with respect;
- Setting a good example by conducting ourselves appropriately,
- Involving pupils in decision-making which affects them;
- Encouraging positive and safe behaviour among pupils;
- Being a good listener;
- Being alerted to changes in a pupil's behaviour;
- Recognising that challenging behaviour may be an indicator of abuse;
- Reading and understanding all the school's safeguarding and guidance documents on wider safeguarding issues, for example bullying, physical contact, e-safety plans, and information-sharing;
- Asking the pupil's permission before doing anything for or to them which is of a physical/personal nature, such as assisting with dressing, physical support during PE or administering first aid or medication;
- Maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language and challenging the use of such language if it occurs;
- Being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of neglect and or abuse.

10. Abuse of trust

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

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, 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.

The school's Code of Ethical Practice sets out the school's expectations of staff (see appendix 1).

11. Pupils who are particularly vulnerable

Some pupils in the community are at increased risk of neglect and or abuse. Many factors can contribute to this increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have an elevated level of tolerance in respect of neglect.

All pupils attending this school are considered vulnerable due to a history of trauma associated with adverse childhood experiences (TrACEs).

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

- Are disabled or have special educational needs
- Are or have been living in a known domestic abuse situation
- Are affected by known parental substance misuse
- Are asylum seekers or refugees
- Are vulnerable to being bullied, or engaging in bullying
- Belong to a family in temporary accommodation
- Belong to a family who are known to have a transient lifestyle
- Belong to a family with a chaotic, neglectful, and unsupportive home situation
- Are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, or sexuality
- Have been involved directly or indirectly in criminal or sexual exploitation
- Do not have Welsh/English as a first language.

Giving special consideration includes the provision of safeguarding information, resources and support services in community languages and accessible formats if/when appropriate.

12. Training

We will ensure that all adults at Ysgol Y Rhos attend regular awareness training on a wide range of safeguarding topics and that both Designated Safeguarding Persons undertake two-yearly training in their role.

Training organised by the Unique Care and Ysgol Y Rhos will take place for school staff.

- On induction to Unique Care / Ysgol Y Rhos
- Throughout the academic year

All school staff:

Have equal chances of training, career development, and promotion.
Receive training on induction, which specifically covers:

- All aspects of this policy
- School Staff Code of Conduct
- Keeping Learners Safe
- Working Together to Safeguard Children
- Female Genital Mutilation
- Prevent Awareness, Radicalisation and Extremism.
- Child Sexual Exploitation
- Reporting and Recording Training / LSI Training.
- The Safe Use of the Internet and social media / E-Safety.
- Equal opportunities / Inclusions
- County Lines
- Safe Handling Medication in Education

All staff are also required to:

- Read Keeping Pupils Safe (Summary Guidance) and confirm that they have done so. Each time Keeping Pupils Safe is updated by the Welsh Government, staff will be updated on the changes via email and/or in-person training.
- Complete Modules 1-4 Keeping Pupils Safe from the Hwb website:
- **Keeping Pupils Safe: Module 1 on Hwb Introduction to safeguarding** - Everyone in education should share a common goal of keeping pupils safe. This module will help you understand safeguarding and your responsibilities. It is the first module of three available in this package and appropriate for all staff.
- **Keeping Pupils Safe: Module 2 on Hwb Safeguarding roles and responsibilities** - you will learn more about your role and responsibilities when it comes to keeping pupils safe.
- **Keeping Pupils Safe: Module 3 on Hwb Safeguarding practice case studies** - we will look at some case studies. These will help you to put what you now know about keeping pupils safe into practice.
- **Keeping Pupils Safe: Module 4 on Hwb Online safety for practitioners** - you will learn what online safety means, and about the important role you have when it comes to keeping pupils safe online.

All school staff must undertake appropriate annual renewal training in:

- Child protection issues
- PI training (PRICE)
- Recognising signs of abuse
- Handling disclosures

All school staff must attend additional awareness training in the following:

- What to do if a child is being abused
- Peer-on-Peer abuse
- Honour-based violence
- Understanding and knowing how to overcome the additional safeguarding vulnerabilities of pupils with ALN.

13. Safer Recruitment

- To ensure a safer recruitment process is in place.
- To prevent people who pose a risk of harm from working with children.

- To check staff who work with children.
- To take proportionate decisions on whether to ask for any checks beyond what is required.
- To ensure that at least one person on any appointment panel has undertaken safer recruitment training.

Disclosure and Barring Service Checks

- To ensure Disclosure and Barring Service checks are undertaken for everyone working with children in the school.
- To complete prohibition checks for everyone in teaching work and to check that no one is restricted from working as a teacher in another EEA country.
- To ensure all visitors are suitably checked and monitored.
- To ensure Disclosure and Barring Service checks are undertaken for who volunteers to run an after-school sports club such as football, netball, rugby etc.
- To ensure Disclosure and Barring Service checks are undertaken for any adult employed by the school from a sports agency who coach children either in school or as an after-school club.

Single Central Record

To ensure a Single Central Record is in place, up to date, and fulfils all statutory requirements that cover everyone who works in regular contact with children such as all:

- School staff
- Therapist
- Other staff working in school.
- Proprietors/Directors

The following information will be recorded for all school staff:

- An identity check.
- A barred list check.
- An enhanced DBS. check/certificate.
- A prohibition from teaching check
- A check of professional qualifications
- A check to establish the person's right to work in the U.K.

- A section 128 check for those in school management positions
- Checks on those who have lived or worked outside the U.K.

14. Prevention

It is not appropriate for pupils to be given sole responsibility for their own safety. However, through the help and support they receive at Ysgol Y Rhos it is possible to make abuse and exploitation less likely through a proactive prevention programme.

Teachers/teaching support at our school will ensure that all pupils are aware of their absolute unconditional right to be kept safe and free from harm. Teachers/teaching support will work with individual pupils on their personal safety and protection and provide them with advice, assistance, guidance, and support on how to keep themselves safe in future.

Keyworkers, teachers, foster carers and support workers and others will also act as 'Safe Adults' to whom pupils can turn for help if they have been harmed or fear they may be harmed in future. They will also inform pupils of other safeguarding options including the names and phone numbers of the Designated Officer for Ysgol Y Rhos, local Children's Rights Officer, Estyn and CIW Inspectors, as well as Child Line and the local police. Contact details will be displayed in each school building.

It is important for the Headteacher/teaching support to also emphasise with each pupil their responsibilities not to harm or exploit any of the other pupils with whom they study and to treat them with dignity and respect (cross reference 'Preventing Bullying Policy')

To minimise the risk of abuse, teachers/teaching support must:

- Make full assessments of children's histories and any experience of abuse
- Observe contacts between children, look out for concerns and share observations with other staff (staff meetings, seniors meetings, line manager supervisions)
- Supervise children at all times, where possible
- Observe and minimise physical contact between staff and children ('Safe Caring')
- Risk assess one to one time alone by staff with children
- Recognise the possible involvement of children in exploitation and look out for the signs
- All staff will be vigilant at all times about pupils accessing social media and the Internet. During school hours all use of IT equipment will be fully monitored, risk assessed, and young person will have no access to social media. Staff will be vigilant against any form of cyberbullying, grooming, inappropriate relationship building, mental health, gambling, online sexual violence and harassment, self-worth, child development, criminal exploitation, device addiction, child sexual exploitation, radicalisation, and reputation damaging.

- Include in the curriculum, activities and opportunities for relationships and sexuality education which equip children with the skills they need to stay safe from abuse and to know to whom to turn for help.
- Include in the curriculum material that will help children develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills.
- Build relationships with other agencies and ensure early and appropriate referrals for support and intervention are made before risks escalate.

15. Presentation

Safeguarding concerns about pupils who are educated at our school can arise from one of four sources:

- From their contact with people, they know in the community (family, friends, relatives, organised perpetrators – see 'Child Sexual Exploitation policy')
- From their contact with professionals who are involved in their care and education (Residential and Field Social Workers, Teachers, therapists, Foster Carers, etc)
- From their contact with other pupils with whom they live or attend school with.
- From within the child themselves when presenting with self-injurious behaviour or suicidal ideations.

Concerns can emerge either through a direct allegation by the pupil him / herself or through an allegation/disclosure or observation by a third party (another pupil / a teacher/teaching support/ carer / other professionals / non-professional people).

Teachers, teaching support and carers will always be available to listen to pupils who want to express concerns about their own or other pupils' safety. Whoever the pupils choose to tell of their concerns has a personal responsibility to take the appropriate action to promote the pupil's safety.

If ever a pupil chooses to disclose their own abuse or express concerns about another pupil's safety inaction is not an option.

All allegations or concerns in relation to abuse, neglect and / or sexual Exploitation will be taken seriously and managed in line with The Wales Safeguarding Procedures for Children and Adults at Risk of Abuse and neglect 2019

Each member of staff is required to familiarise him/herself with the contents of the The Wales Safeguarding Procedures for Children and Adults at Risk of Abuse and neglect 2019.

All teachers/teaching support receive training in Safeguarding Children at Induction and on an ongoing basis to ensure that they remain competent and are equipped to meet the safeguarding needs of the pupils they look after. All teachers/teaching support receive regular supervision in which issues in relation to the management of child safeguarding concerns can be addressed and any training needs identified.

16. Dealing with Disclosure's

The following procedures should be followed when a young person makes a disclosure to a member of staff.

Staff must not give absolute guarantees of confidentiality to those who report possible significant harm to them, but they should guarantee that the information will only be passed to the minimum number of people who need to know to ensure proper action is taken to sort the problem out. Below are a list of Do's and Don'ts to help staff understand their role in dealing with Safeguarding Concerns.

DO

- Listen to the young person attentively and maintain eye contact.
- Allow the young person to talk, but don't press for information.
- Explain to the young person that they are not to blame for anything that has happened.
- Reassure the young person that they were right to speak out.
- Let the young person know that other people will have to be told so that the abuse can stop.
- Try to explain in a way that the young person can understand.
- Report the disclosure to the DSP, following correct policy and procedure.

DON'T

- Promise to keep secrets or make any promises that you can't keep.
- Interrogate the young person or ask leading questions.
- Cast doubt on what they have said or made the young person feel responsible for what's happened.
- Show anger or panic and act hastily.
- Talk to the alleged abuser or attempt to conduct their own investigation.

17. Recording

If pupils choose to disclose their abuse, neglect, or exploitation to teachers/teaching support, this should be managed in line with the guidance above (Dealing with disclosure) and fully recorded as a safeguarding concern onto SLEUTH.

The record must include details of the date, time, location, and circumstances in which the disclosure was made in addition to as near as possible a verbatim account of what the student said. Teachers/teaching support will not 'translate' the student's account into adult language, nor censor it nor put their own interpretation on what has been alleged. In addition, it should be legible, clear, concise, and free from jargon and abbreviations, separate fact from opinion and signed.

The record should be made as soon as practicably possible after the information has been received, and at the latest by the end of the school day on which the situation arose.

The record must be made by the teacher / teaching staff that dealt with the disclosure. If the initial disclosure was dealt with by a member of care staff who were supporting the school then that member of care staff should record all of the above confidentially

down onto paper and immediately provide to the member of school staff that they were supporting so that the disclosure can be recorded onto SLEUTH.

The member of staff to whom the disclosure was made should also inform the DSP or DDSP as soon as possible. The DSP / DDSP will make a same day referral to Children's Services, if required in line with 'The Wales Safeguarding Procedures'.

18. Procedure to deal with allegations (against pupils or staff)

All allegations are to be reported immediately.

Step 1

Designated Safeguarding Person informed & allegations reported.



Step 2

The Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos, Sion Wyn Thomas immediately informed by DSP.



Step 3

Flintshire Children's Services First Response Team is contacted to discuss the allegation, and the Placing Authority Social Worker is informed.



Step 4

Referral to Children Social Care via the North Wales Children's Services Multi-Agency Referral Form

If the case leads to a strategy meeting the **DSP/DDSP** & the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos, Sion Wyn Thomas. The decision of the strategy meeting could be:

- An investigation by children's social care
- A police investigation if there is a criminal element to the allegation
- Single agency investigation completed by the headteacher.

Allegations against the DSP / DDSP

- The same Procedure is followed as above, except that Step 1 is to inform the DDSP who will inform the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos, Sion Wyn Thomas.



Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for Child Protection action. Poor practice examples include unfairly singling out a pupil, using sarcasm or humiliation as a form of control, bullying, or belittling a pupil or discriminating against them in some way. Complaints are managed by the head teacher, and the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

19. If you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in an exceedingly 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 welfare of the pupil is paramount.** The school's whistle blowing code (appendix 2) enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns about poor practice or concerns about a pupil's welfare brought about by the behaviour of colleagues should be reported to the Head Teacher. Complaints about the Head Teacher should be reported to the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos, Sion Wyn Thomas).

20. 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 pupil to deliberately make a false or malicious allegation, although some pupils may have a history of making false allegations. Additionally, misunderstandings and misinterpretations of events can and do happen. A pupil may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, some adults will pose a serious risk to pupils' welfare and safety and staff must act on every allegation made. 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 where this is deemed to be the best way to ensure that pupils are protected.

Allegations against staff should be reported to the Head Teacher. Allegations against the Head Teacher should be reported to the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos, Sion Wyn Thomas.

The full procedures for dealing with allegations against staff can be found in 'The Wales Safeguarding Procedures' "Safeguarding allegations / concerns about practitioners in and those in a position of trust"

21. Record keeping in respect of allegations against staff / carers.

The organisation will keep a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and details of any action taken, and decisions reached, on a person's confidential personnel file and give a copy to the individual. Such information will be retained on file, including for people who leave the organisation, at least until the person reaches normal retirement age or for 10 years if that will be longer. The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where a future DBS reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will also prevent unnecessary re-investigation if, as sometimes happens, allegations re-surface after a period.

All allegations or concerns about abusive or potentially abusive behaviour of professionals will be taken seriously and investigated thoroughly. If the allegation is in relation to staff who work for our school, then an Incident form must be completed by the Headteacher and forwarded to the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos.

Upon receipt of this information, the Headteacher will decide how the concerns should be progressed (in line with the Unique Care Home's Whistleblowing Policy). If the Headteacher is unclear about whether what has been alleged constitutes abusive behaviour, they **must** consult with the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos and keep a record of this consultation.

If it is agreed that the matter will be progressed as a Safeguarding concern, it will be managed in line with Flintshire and Wrexham Local Safeguarding Children's Board procedures. In this circumstance the designated member of staff will inform the Placing Authority, the Senior Manager Safeguarding verbally, and confirm the information in writing by the end of the next working day.

N.B. In using these procedures, if the person to whom concerns should be reported is not available, then the information should be passed directly to the designated member of staff. Under no circumstances should there be any avoidable delay in progressing concerns about student's safety and protection.

The paramount consideration in managing allegations or concerns about professional abuse is the safety and welfare of students. This consideration must be tempered, however, with the need to treat teachers/teaching support fairly and respect for the principles of natural justice.

Because of the pupils vulnerability at our school, it is necessary to take a "safety first" approach to any expressions of concern about professional misconduct. Therefore, this policy acknowledged the need to act based on allegations and that any action taken by the school in the short term to safeguard and promote the welfare of children is done without prejudice (i.e., no presumption of guilt). No disciplinary or any other action will be taken without a full and proper investigation, in the course of which the

accused member of staff will be given the opportunity to respond to any allegation which has been made.

Immediate response to an allegation or concern about a practitioner

Any allegation or safeguarding concern about a member of staff, carer, practitioner or person in a position of trust will be managed in accordance with Section 5 of the Wales Safeguarding Procedures. The person receiving the information must treat it seriously, keep an open mind, make a factual, signed and dated written record, and report it immediately to the DSP or Headteacher. They must not investigate, ask leading questions, make assumptions, promise confidentiality or inform or confront the person who is the subject of the allegation.

The school will take any immediate action necessary to safeguard children and will seek advice from the LADO/DOS and, where appropriate, the police or children's social services before deciding what information may be disclosed to the person who is the subject of the allegation.

Additional Considerations

Parents/carers of a child or children involved should be told about the allegation as soon as possible if they do not know about it already (the placing authority social worker can decide who will do this). They should be kept informed about the progress of a case and told the outcomes where there is not a criminal prosecution. That includes the outcome of any disciplinary process.

The Unique Care Homes HR department will nominate an officer to keep the person who is subject to the allegation informed of the progress of the case and arrange to provide appropriate support to the individual while the case is ongoing. If the person is suspended, the employer should also make arrangements to keep the individual informed about developments in the workplace.

Where the concern or allegation has come from a member of staff, the whistleblowing procedures apply in respect of the concern being raised (cross-reference 'Whistle Blowing Policy').

The Wales Safeguarding Procedures Section 5 must be considered where a person working or volunteering with children is alleged to have:

- Behaved in a way that has harmed, or may have harmed a child.
- Possibly committed a criminal offence against, or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm or;
- Behaved in their personal life in a way that may indicate they pose a risk to children within their employment or voluntary role.

The matter must be reported immediately to the Headteacher and DSP. Where the concern relates to the Headteacher or DSP, it must be reported to the proprietor. The school will ensure the immediate safety of those involved, complete an initial organisational risk assessment and notify the relevant Local Authority Designated Officer/Designated Officer for Safeguarding (LADO/DOS) within 24 hours or the next working day. The police and children's services will be contacted immediately where a child may be in immediate danger.

There may be up to three strands in the consideration of an allegation:

- A police investigation of a possible criminal offence.
- Enquiries and assessment by children's social care about whether a child is in need of protection or need of services; and
- Consideration by an employer of disciplinary action in respect of the individual.

Some cases will also need to be referred to the DBS for consideration of including the person on the DBS barred lists or for consideration by professional bodies or regulators.

There is written guidance available for staff, which makes clear how teachers/teaching support and carers who are the subject of an allegation will have ongoing support from a nominated individual whilst an investigation continues. (Please refer to the Disciplinary policy for full details). In brief, the following actions will be undertaken:

Suspension

Suspension will not be automatic. Following an initial organisational risk assessment, the school will consider whether the person can safely continue in their role and what proportionate interim safeguards are required. This may include increased supervision, restrictions on duties or contact, alternative duties, temporary redeployment or, where necessary, suspension. The school will consult HR and share the arrangements with the LADO/DOS, seeking advice from the police or children's social services where appropriate. Any interim action will be taken without prejudice, kept under regular review and will not imply guilt.

Where suspension is considered necessary, employees are prohibited from attending the workplace other than for the purpose of attending meetings/hearings concerning the matter and should not make contact with any work colleagues or students in the Company's care with the exception of their nominated representative, in most circumstances this will be a member of the HR Department. Whilst each case will be dealt with depending on the circumstances, any period of suspension necessary will be as brief as possible and kept under review.

Where the matter under investigation is in relation to a child protection or safeguarding matter, it may not be possible to divulge the details of the specific allegations that have been made on initial suspension so as not to jeopardize the investigation or lead to further allegation. The person will be provided with as much information as can properly be disclosed, at an appropriate stage and following advice from the LADO/DOS and, where relevant, the police or children's social services.

Decision making

If the complaint or allegation is such that it is clear that investigations by police and/ or enquiries by children's social care are not necessary, or the strategy discussion or initial evaluation decides that is the case, then Flintshire Safeguarding Team should discuss next steps with the organisation. In those circumstances, options open to us, the organisation, will range from taking no further action to summary dismissal or a decision not to use the person's services in the future. The nature and circumstances of the allegation and the evidence and information available will determine which range of possible options is most appropriate.

In some cases, further investigation will be needed to enable a decision about how to proceed. If so, Flintshire Safeguarding Team should discuss with us, the organisation, how, and by whom the investigation will be undertaken. This should normally be undertaken by us as the employer. However, in some circumstances, if appropriate resources may not be available in the organisation or the nature and complexity of the allegation might point to us commissioning an independent investigation.

Resignations and 'compromise agreements.'

The fact that a person tenders his or her resignation, or ceases to provide their services, must not prevent an allegation being followed up in accordance with these procedures. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to co-operate with the process. Wherever possible, the person should be given a full opportunity to answer the allegation and make representations about it, but the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be regarded as substantiated on the basis of all the information available should continue even if that cannot be done or the person does not co-operate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

By the same token so-called 'compromise agreements' by which a person agrees to resign, the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference must not be used in these cases. In any event, such an agreement will not prevent a thorough police investigation where appropriate. Nor can it override an employer's statutory duty to make a referral to the DBS where circumstances require that.

The following definitions should be used when determining the outcome of allegation investigations:

- a) **Substantiated:** there is sufficient evidence to prove the allegation.
- b) **False:** there is sufficient evidence to disprove the allegation.
- c) **Malicious:** there is clear evidence to prove there has been a deliberate act to deceive, and the allegation is entirely false.
- d) **Unfounded:** there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

Dealing with allegations/observations of abuse, neglect, or exploitation which arise in the community.

If information is received either directly or via a third party that a student has been abused by a person known to them in the Community, this will be taken seriously.

If the Headteacher has any doubt about whether the information received constitutes a child safeguarding concern, they **must** consult with a more senior designated member of staff. If following this consultation, it is still unclear whether the situation requires a safeguarding response, then the designated member of staff **must** consult

with Flintshire Safeguarding Team. The designated member of staff will keep a record of this consultation.

22. Dealing with allegations of Peer Abuse / Exploitation

In the event of information being received either directly or via a third party that one student is being physically or emotionally abused by a student, this will be taken seriously and dealt with through the school's Anti-Bullying Policy.

If allegations relate to sexual abuse or Exploitation, these should be managed in the same manner as the procedures for concerns that arise in the Community. (Cross-reference – CSE Policy)

In these circumstances, it is important to recognise that both the victim and alleged perpetrator are both children in need and that both sets of respective needs must be taken into account in the course of any subsequent investigation / police enquiry.

If it emerges that a student is being physically or emotionally harmed by a sibling this information must be brought to the attention of the student's parents or social worker and agreement reached on how the concern should be progressed via Wales Safeguarding Procedures.

In this event the person who raises the matter should record the date and time of the discussion and the conclusions reached:

23. Confidentiality

If teachers/teaching support receive information from any source that a student has experienced abuse or exploitation or may be at risk of such, then they have a **duty** to pass this information to the designated member of staff with responsibility for child protection who in turn will pass the information to the Flintshire Safeguarding Team. If the concern is in relation to the designated safeguarding person, then the concern must be reported to the Director of Unique Care Homes Ltd and Proprietor of Ysgol Y Rhos.

If pupils or non-professional adults wish to share such information with teachers/teaching support, they need to be made aware that it will not be possible to guarantee confidentiality. Teachers/teaching support can reassure informants; however, if the allegation is from a third party, that the source of the information can remain anonymous. The reason for the decision to share (or not share) information must be recorded in writing and maintained by the designated member of staff.

When there are historical or current safeguarding concerns about a pupil this information will be shared on a 'need to know' basis with the minimum number of people necessary to ensure the pupil's safety and welfare. People who are informed will receive only the minimum amount of information necessary to enable them to implement the student's childcare plan or PEP.

All our teachers/teaching support will take steps to ensure that confidentiality of information is maintained by refraining from talking indiscreetly about the student's past history and by keeping records in a safe and secure place with access strictly limited.

Partnership

Ysgol Y Rhos believes that the best outcomes for pupils are achieved when professionals can work effectively together and with parents/carers. Our school staff believe in open and honest communication and will always share with parents/carers any causes for concerns they have about their children at the earliest opportunity. The only exception to this would be where it was felt such communication might compromise the pupil's safety.

Ysgol Y Rhos will be responsible for reviewing these procedures annually, or sooner if there has been a legislative change.

Ysgol Y Rhos recognises that local safeguarding arrangements may vary. As such the Headteacher is responsible for submitting this policy for consideration and comment to the Flintshire Safeguarding Team and are consistent with the local policies and procedures agreed by the Flintshire. Any conflicts between locally agreed procedures and those of other responsible authorities are discussed and resolved as far as possible.

Children and young people educated at Ysgol Y Rhos will be made aware of the safeguarding procedures in an age-appropriate manner and format.

SAFEGUARDING PUPILS WHO ARE VULNERABLE TO EXPLOITATION, FORCED MARRIAGE, FEMALE GENITAL MUTILATION, OR TRAFFICKING

Our safeguarding policy through the school's values, ethos and behaviour policies provides the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other as well as feel safe and secure.

Our school keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of Exploitation.

Our staff are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age-appropriate way in their curriculum,

Our school works with and engages our families and communities to talk about such issues,

Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.

Our DSP / DDSP know where to seek and get advice, as necessary.

Our School brings in experts and uses specialist material to support the work we do.

24. Female Genital Mutilation (FGM)

FGM involves cutting, and sometimes sewing the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation. The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen, and Iraq.

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a U.K. national or permanent resident but also to take a girl out of the U.K. to have FGM performed abroad, even to countries where FGM is still legal.

The indicators of FGM may initially mirror those of sexual abuse. You may notice, for example, that a girl or young woman shows signs of pain or discomfort, needs to visit the toilet constantly, has vaginal blood loss or is unable to sit comfortably. She may make excuses to avoid P.E. and other physical activity or refuse to use the school showers. She may also become evasive or fearful if you enquire if she is unwell and assure you that she is fine when she clearly is not. If she is a B.M.E. child and has recently arrived back from a 'holiday' abroad or a period of absence from School, seems to be in pain and has not been taken by her family to see a doctor, you should consider FGM, alongside other possible explanations.

Staff will complete the online training on the subject via the schools online training platform and refresh their knowledge through Hwb site.

25. Forced marriage.

The subject of forced marriage is also highlighted in Safeguarding Children and Safer Recruitment in Education. Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats, and possibly physical and sexual abuse. It is very different from an arranged marriage, where both young people can make the decision to accept or decline the partner chosen for them by their parents. Once again, schools can be seen as being in the front line in protecting young people from this type of abuse. A pupil who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, maybe seemingly innocuous, such as talking about taking a holiday abroad. Their fear that the proposed holiday will result in a forced marriage may only become apparent after several conversations.

These young women may also become victims of what is termed honour-based violence. This type of violence is described in 'The Right to Choose' guidance: 'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment, and murder where the person is being punished by their family or their community.'

26. Prevent Programme

All staff will complete the online Prevent training HM Government [Prevent duty training - GOV.UK](#) and may attend annual Prevent training as delivered by the local police team(s).

WHAT WE DO WHEN WE ARE CONCERNED

Where risk factors are present, but there is no evidence of a particular risk, then the DSP / DDSP will advise on preventative work that can be done within school to engage the pupil into mainstream activities and social groups. The DSP / DDSP may well be the person who talks to and has conversations with the pupils family / carers / social workers / legal guardians, sharing the school's concern about the young person's vulnerability and how the family and school can work together to reduce the risk.

The school will review the situation after taking appropriate action to address the concerns.

Incidents will be logged in the Incident Log and onto incident forms which will be uploaded onto SLEUTH under the appropriate safeguarding category.

27. Sharing nudes and semi-nudes

Our school takes guidance from the Welsh Government statutory guidance: Keeping Learners Safe

All incidents involving youth produced sexual imagery should be responded to in line with the school's safeguarding and child protection policy.

When an incident involving youth produced sexual imagery comes to school attention:

- The incident should be referred to the DSP/DDSP as soon as possible.
- The DSP/DDSP. should hold an initial review meeting with appropriate school staff.
- There should be subsequent interviews with the young people involved (if appropriate)

Parents / carers / social workers / legal guardians, should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

Upskirting (see Mobile Phone Safety and Acceptable Use policy), which is a criminal offence following the introduction of the Voyeurism (Offences) Act 2019, typically involves taking a picture under a person's clothing without them giving their consent, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (We must be aware that a very young pupil or one with ALN may be aware that she has been the victim of this act but might be intimidated or unaware of their right to complain).

Disclosure

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSP/DDSP in school, or

any member of the school staff. They may report through an existing reporting structure, or a friend or parent may inform someone in School or college or inform the police directly.

All members of staff (including non-teaching) should be made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This should be covered within staff training and within the school or college's child protection policy. Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort, and they may have already tried to resolve the issue themselves.

Initial review meeting

The initial review meeting will be conducted by the Headteacher and should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed.
- What further information is required to decide on the best response?
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved which would influence risk assessment.
- If there is a need to contact another school, college, setting, or individual.
- Whether to contact parents or carers of the pupils involved - in most cases, parents/ carers should be involved.

An immediate referral to Flintshire Child Protection Team and/or children's social care / Childs Social Worker should be made if at this initial stage:

1. The incident involves an adult.
2. There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example, owing to additional learning needs)
3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
4. The imagery involves sexual acts.
5. You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery; for example, the young person is presenting as suicidal or self-harming

If none of the above applies, then the school may decide to respond to the incident without involving the police or children's social care (the school can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSP/DDSP is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within

the school's pastoral support and disciplinary framework and if appropriate local network of support.

The decision should be made by the DSP/DDSP with input from other members of staff if appropriate. The decision should be recorded in line with school policy.

The decision should be in line with the school's child protection procedures and should be based on consideration of the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of young people. The decision should be reviewed throughout the process of responding to the incident.

If a young person has shared imagery consensually, such as when in a romantic relationship or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast, any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

28. ALN

All staff will be extra vigilant where students with ALN are concerned, as they might not be able to clearly demonstrate or communicate that they would be a victim of abuse, bullying, exploitation, or other safeguarding issues.

29. Extended school and off-site arrangements

Where extended school activities are provided by and managed by the school, this Safeguarding policy and associated procedures apply. If other organisations provide services or activities to our pupils, we will check that they have appropriate procedures in place, including safer recruitment procedures. Whenever our pupils attend off-site activities, we will carry out a risk assessment and ensure that Unique Care Homes staff always accompany them.

30. Risk Assessments

Risk assessments will be carried out for any new activities undertaken as part of the school curriculum and for any off-site activities before every occasion (see separate policies and procedures)

Additionally, pupil risk assessments will be undertaken when any pupil joins the school. These risk assessments will be updated at least termly but also following any major incident.

31. Photography and images

Most people who take or view photographs or videos of pupil do so for entirely innocent, understandable, and acceptable reasons. However, to protect pupils the school and all its staff will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Seek corporate parent consent
- Use only the pupil's first name with an image
- Ensure that pupils are appropriately dressed when photographed
- Encourage pupils to tell us if they are worried about any photographs that are taken of them.

32. e-Safety

Most of our pupils will use mobile phones and computers at some time. They are a source of fun, entertainment, communication, and education. However, we know that some adults, and pupils will use these technologies to harm others. The harm might range from sending hurtful or abusive texts and emails, to enticing pupils to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The school's e-safety policy explains how we try to keep pupils safe in school. Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and whilst some pupils will undoubtedly be 'chatting' on mobiles or social networking sites at home **they are not allowed to access these sites whilst in school**. To that end **NO** pupils are allowed to bring mobile phones on to the school site and only school computers, laptops and tablets are used. In the specific case where a pupil has a laptop provided by their home local authority for home-school use, it will be regularly checked to ensure that it can be safely used in school.

Although the school has safeguards / parental controls in place to ensure that inappropriate materials cannot be accessed, it is known for those protections to be by-passed by pupils. Therefore, no pupil will have access to ICT without a member of staff being present and any pupil with a history of inappropriate use of ICT will have one to one support when using ICT. (This will be shown in their individual risk assessment)

The school recognises that artificial intelligence and other emerging technologies may create safeguarding risks, including exposure to inappropriate or misleading content, misuse of personal information, online grooming, harmful interactions and the creation or alteration of images, audio or video. Technology used in school will be age-appropriate and considered for its safeguarding and data-protection implications. Pupils will be taught to recognise manipulated content, protect personal information and report concerns. Safeguarding concerns involving AI or other digital technology will be recorded and managed through the same procedures as other online or offline concerns.

33. Reporting directly to Child Protection agencies

Staff should follow the reporting procedures outlined in this policy.

However, they may also share information directly with social services, the local authority safeguarding team and / or the police, if:

- The situation is an emergency and the DSP, DDSP, and the Director for Unique Care Homes / The Proprietor of Ysgol Y Rhos are all unavailable.
- They are convinced that a direct report is the only way to ensure the pupil's safety.

34. Key Safeguarding Contacts

Designated Safeguarding Person	Deputy Designated Safeguarding Person	Director of UCH & Proprietor of Ysgol Y Rhos
Sam Thomas	Fred Smith	Sion Thomas
Headteacher 07706342432 headteacher@we-are-unique.care	Teacher 01352 770 100 fred@we-are-unique.care	Director 07525287502 sion@we-are-unique.care

Outside agencies contacts

Name	Contact Details
Senior Manager Safeguarding (Designated Safeguarding Manager) Flintshire	Jane Davies The Duty Social Worker, Duty and Assessment Team, Social Services for Children, County Offices, Chapel Street, Flint, CH6 5BD 01352 701000 Out of office hours: 0345 053 3116. ChildProtectionReferral@flintshire.gov.uk
North Wales Safeguarding Board	www.northwalessafeguardingboard.wales regionalsafeguarding@denbighshire.gov.uk 01824 712903
Care Inspectorate Wales (CIW)	Welsh Government Office Sarn Mynach Llandudno Junction LL31 9RZ 0300 7900 126 ciw.north@wales.gsi.gov.uk
Prevent	https://www.northwales.police.uk/advice/advice-and-information/t/prevent/prevent 0800 011 3764 Online Referral: https://www.northwales.police.uk/advice/advice-and-information/t/prevent/prevent/beta/prevent-team-referral/ Online Report for Extremist Material: https://www.gov.uk/report-terrorism

NSPCC whistleblowing advice line	https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/ 0800 028 0285 help@nspcc.org.uk
----------------------------------	--

ACTIONS TO BE TAKEN AT YSGOL Y Rhos IN CASES OF:

PROFESSIONAL ABUSE

Who?	Whom to inform/ report to?
Staff Member	Sam Thomas DSP / Fred Smith DDSP 07706342432 / 01352 770 100
Fred Smith	Sam Thomas DSP 07706342432 / 01352 770 100
Sam Thomas	Sion Thomas Proprietor 07525287502
Sion Thomas	Flintshire Safeguarding Team 01352 701000

CHILD SAFEGUARDING CONCERNS

Who?	Whom to inform/ report to?
Staff Member	Sam Thomas DSP / Fred Smith DDSP 07706342432 / 01352 770 100
Fred Smith	Sam Thomas DSP 07706342432 / 01352 770 100
Sam Thomas	Sion Thomas Proprietor 07525287502
Sion Thomas	Flintshire Safeguarding Team 01352 701000

35. Monitoring and Review

This policy will be revisited on a regular basis when any issue is found to have substance in fact.

It will be formally reviewed every annually and changes will be discussed with SMT, (Senior Management Team).

Appendix 1

Code of ethical practice for school staff

All staff are valued members of the school. Everyone must set and maintain the highest standards, work as part of a team and be an excellent role models.

All school staff should:

- Place the safety and welfare of pupils above all other considerations
- Treat all members of the school community, including pupils, parents, colleagues and Unique Care Homes officers and advisers with consideration and respect
- Adhere to the principles and procedures contained in the policies in our safeguarding portfolio and in teaching and learning policies
- Treat each pupil as an individual and adjust meet individual need
- Demonstrate a clear understanding of, and commitment to, non-discriminatory practice
- Recognise the power imbalances between pupils and staff, and various levels of seniority of staff and ensure that power and authority are never misused
- Dress appropriately, avoiding any sexually suggestive wear
- Show respect for pupils by arriving on time for all lessons/activities
- Show respect by preparing well-planned lessons and having all necessary resources available at the start of the lesson
- Use appropriate language and avoid any sexually suggestive or explicit phrases
- Understand that school staff are in a position of trust and that sexual relationships with a pupil even over the age of 16, may be an offence
- Be alert to, and report appropriately, any behaviour that may indicate that a pupil is at risk of harm
- Encourage all pupils to reach their full potential
- Never condone inappropriate behaviour by pupils or other staff
- Refrain from any action that would bring the school into disrepute
- Value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice.
- Never use a personal mobile phone or personal account on social networking sites to contact or take or obtain photographs of any pupil who attends or has attended the school. Equal never share your pictures and personal information with these pupils.

Appendix 2

Whistle blowing code for issues relating to pupils

Purpose of this code

The school adheres to the Unique Care Homes whistle-blowing policy and procedures that enable staff to raise concerns relating to:

- Poor / unprofessional practice
- Inappropriate conduct
- Crime
- A miscarriage of justice
- Illegality
- Health and safety
- Environmental or property damage
- Unauthorised use of public funds
- Concealing or attempting to cover up any of the above.

This code provides additional information to help staff to understand the role of whistle blowing in the context of poor practice and unacceptable conduct and attitudes towards pupils.

When to use the code

The whistle blowing procedures and this code may be used by anyone employed by the school in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a pupil is inappropriate.

Inappropriate conduct includes, but is not confined to:

- Bullying or humiliation
- Contravening health and safety guidelines
- Serious breaches of the school's code of ethical practice
- Professional practice that falls short of normally accepted standards
- Behaviour compromising pupils' welfare but in a way that does not meet the threshold for Child Protection intervention.

Reasons for blowing the whistle

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, everyone must take responsibility for ensuring that pupils are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with profound consequences.

Your action may not only protect pupils, but also deter any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Whistle blowing can also support the member of staff who is the subject of the concern. Their conduct may result from inexperience or lack of training that can be addressed by the school, or they may be under stress and be relieved when their conduct is questioned.

Staff who deliberately fail pupils and show no remorse or desire to improve are unlikely to welcome being exposed, but their conduct must be confronted for the sake of the pupil concerned and the reputation of the whole school.

Barriers to whistle blowing

You may worry that you have insufficient evidence to raise a concern and that you will set in train an unstoppable chain of events, that there will be adverse repercussions for your career, that you may suffer reprisals, harassment, or victimisation, or that your suspicion or concern might be totally misplaced.

These concerns are entirely understandable, but you can be reassured that whistle blowing procedures addresses these issues.

The Public Interest Disclosure Act 1998 protects employees from reprisals for public interest whistle blowing. Your union, a solicitor or Unique Care Homes head office can provide you with information about your legal position.

Confidentiality and anonymity

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an investigation, you are required to provide a witness statement or attend a court hearing.

You can, if you prefer, raise your concern anonymously. The school would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.

The school will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistleblowing. Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

Reporting procedure

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

- You may raise your concern verbally or in writing. You should report your concern directly to the Headteacher.
- If the Headteacher is the subject of your concern, speak to the Service Director.
- A friend, colleague or union representative may accompany you to an initial meeting if you wish.
- Ensure the Headteacher or Service Director informs you of their proposed action and sets a date for a second meeting.
- 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.
- Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.

Process and outcome

The headteacher or Service Director will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred. Members of the school community, including Directors, may be asked to provide information or advice.

- A written record of the conduct established facts and outcome of the inquiry will be kept.
- The whistleblower will be kept informed of the progress of the inquiry.
- The outcome of the inquiry will be one of the following:
 - No poor practice or wrongdoing is established, and the case is closed.
 - The concern has some substance, and the subject of the concern will receive advice and support from the headteacher to improve practice.
 - Poor practice or wrongdoing is established, and disciplinary proceedings are initiated.
 - The concern is more serious, and an investigation is initiated. This investigation may involve the local authority's legal team, children's social care or the police.

If, at any stage in the process, there is reason to believe that a pupil is at risk of significant harm, children's social care will be immediately involved.

Further action

If you raise a concern and you are dissatisfied with the way it is managed, or the outcome, you may contact Unique Care Homes Directors for advice. Alternatively, you can seek advice from your union or professional association, a solicitor, the police, children's social care or Public Concern at Work (PCaW), a registered charity that offers free and confidential legal advice on workplace malpractice.

Public Concern at Work

3rd Floor, Bank Chambers, 6-10 Borough High Street, London SE1 9QQ

020 7404 6609

whistle@pcaw.co.uk

www.pcaw.co.uk

Appendix 3

Recognition and Signs of Abuse

Within North Wales Safeguarding Children Board Procedures file, there is a list of warning signs of abuse and neglect. All teachers, teaching support, and carers should make themselves aware of these. They should, however, bear in mind that such lists are not exhaustive, and all staff has a responsibility to seek out further reading material and training opportunities to develop their knowledge and skills in recognising and dealing with child abuse. Training needs should be brought to supervision such that they can be appropriately met and reviewed.

Below is a list of some of the signs of physical abuse, sexual abuse, and the impact of emotional abuse:

Physical Abuse

- Multiple bruising to various parts of the body
- Outline bruises- hand marks/ slipper prints straps.
- Bi-lateral black eyes
- Symmetrical bruising

Sexual Abuse

- Sexually transmitted diseases
- Severe and persistent self-harming
- Genital injuries- alleged accidents with bikes, spikes, fences, self-inflicted- with attendant damage- bruising, tears, etc
- Pregnancy where the identity of the father is vague or secret.
- Itching/ soreness and bleeding to genital/ anal areas

Impact of Emotional Abuse

- Low self-esteem/self-worth
- Behavioural difficulties (overly passive, overly aggressive, promiscuous attachment, etc.)
- Poor educational attainment
- Depression and anxiety
- Disassociation and detachment

Procedure for dealing with Peer-on-peer abuse.

When an allegation is made by a child/young person against another, members of staff should consider whether the allegation is a complaint or whether it raises a safeguarding concern. If there is a safeguarding concern the DSP/DDSP should be informed.

The DSP/DDSP must alert and report the allegation to the respective social workers of both children and young people involved to assess and determine the way forward. If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents (if applicable) informed.

The information and situation should be assessed. This assessment should consider the risks posed and whether the risks are significant, whether, to keep children and young people the alleged perpetrator must be moved from the placement. Any such decision must be risk assessed and handled sensitively being mindful of the need to support both victim and perpetrator.

The Headteacher and DSP must consider completing a risk assessment including a safeguarding risk assessment to take account of any preventive strategies needed. This should be used to inform an interim supervision plan. Any supervision plan must address the resources necessary to keep all children and young people safe including increased staffing. The supervision and or care plan must be monitored and updated as necessary and should include evaluation of the effectiveness of the plan and risk assessment.

A record of the allegation must be made but no attempt at this stage should be made to investigate the circumstances. The records should include details of the date, time, location, and circumstances in which the allegation was made. The record, should, as far as possible, be a verbatim account of what the child/young person said. Staff should not 'translate' the child/young person's account into adult language or censor it or put their own interpretation on what has been alleged. In addition, it should be legible, clear, concise, and free from jargon and abbreviations.

The Headteacher, DSP, social worker with the child/young person's involvement(victim) makes decisions about the support they need as well as the action necessary in respect of the alleged perpetrator.

Where neither Children's Social Care nor the police accept the allegation, the Headteacher and DSP must nevertheless review the situation to identify whether any additional safeguards and support is necessary to promote all children and young people's welfare.

It is important that the child or young person is kept informed and updated of all action and progress of the concern/allegation. At conclusion, the child and or young person must be informed of the outcome verbally and confirmed in writing. With a copy of the records placed on their case file.

Appendix 5

NSPCC guidance on child protection records retention states:

Guidance on Retention Periods Type of record	Retention
Child welfare concerns that your organisation refers on to children's social care or the police. For example, this would include concerns about physical, sexual, emotional or neglect of a child, disclosures from a child about being abused or information from a third party which might suggest a child is being abused; concerns about a parent or another adult that uses your organisation, or a young person who has been abused by another young person.	The referral should be acknowledged in writing by children's social care and your organisation keeps this on file. Records should be kept for 6 years after the last contact with the service user unless any of the exemptions apply (listed above) or if your organisation is required to comply with any other statutory requirements.
Child welfare concerns that your organisation decide, after consultation, do not necessitate a referral to children's social care or the police. In such circumstances the organisation should make a record of the concern and the outcome. For example, where a child has been bullied, overly pushy parents or a very distressed child where the distress is unrelated to child abuse.	Destroy the record a year after the child/adult concerned ceases to use the service unless the child or adult are continuing to use your organisation.
Concerns about people (paid and unpaid) who work with children and young people, for example, allegations, convictions, disciplinary action, inappropriate behaviour towards children and young people. For example, where an employee has breached the code of conduct, a record of the behaviour, the action taken, and outcome should be recorded.	Personnel files and training records (including disciplinary records and working time records) - retain for 6 years after employment ceases. However, the records should be retained for a longer period if any of the following apply: There were concerns about the behaviour of an adult who was working with children where s/he behaved in a way that has harmed, or may have harmed, a child. The adult possibly committed a criminal offence against, or related to, a child. The adult behaved towards a child in a way that indicates s/he is unsuitable to work with children. In such circumstances, records should be retained at least until the adult reaches normal retirement age, or for 10 years if that is longer.
Disclosure and Barring Service (DBS.) disclosures obtained as part of the vetting process.	The actual disclosure form must be destroyed after 6 months. However, it is advisable that organisations keep a record of the date of the check, the reference number and decision.

Appendix 6

Procedures for dealing with incidents of sexting

Disclosures about sexual imagery can happen in a variety of ways. The child or young person affected may inform a class teacher, a friend, member of staff, social worker, DSP etc. They may report through a parent or fostering household or directly to the police if they are confident to do so.

All members of staff should be made aware of how to recognise and refer any disclosures of incidents involving sexual imagery. This will be supported through training.

Any direct disclosure by a child or young person must be taken very seriously. A child or young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort, and they may have already tried to resolve the issue themselves. Care must be taken to reassure and support the child or young person.

Initial review meeting

The initial review meeting should consider the evidence and aim to establish:

- Whether there is an immediate risk to the child/young person
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery to safeguard the child/young person – in most cases, imagery should not be viewed.
- What further information is required to decide on the best response?
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services in consultation with DSP, police, and others.
- Any relevant facts about the children/young people involved which would influence risk assessment.
- Whether to contact parents

An immediate referral to police and/or children's social care should be made if at this initial stage if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- Whether the imagery suggests from information obtained that the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts.
- You have reason to believe a child/young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

Decision not to involve the police and children social care should only be made if the DSP is confidently that:

None of the above factors applies. If this is the case, the Headteacher and or DSP may decide to respond to the incident without involving the police but should alert the social worker to the concern for their consideration. However, all staff and fostering

household must be mindful that if further information/concerns come to light the incident could be escalated.

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSP is confident that they have enough information to assess the risks to children and young people involved and the risks can be managed with support and activation of the behaviour management procedures.

The decision should be made by the DSP with input from the Headteacher and input from other members of staff where appropriate. The decision should be recorded in line with Unique Care Homes Reporting and Recording Policy, but it is important that the information is recorded on the children/young people's case file.

Cross Reference

- Anti-Bullying Policy
- Equality and Diversity Policy
- Code of Conduct
- Whistle-Blowing Policy
- Disciplinary Policy
- Child Sexual Exploitation Policy
- Safer Recruitment and Retention Policy

Policy Created By	Sam Thomas	10/11/2025
Policy Approved By	Sion Thomas	28/11/2025
Policy Reviewed By	Sam Thomas	01/09/2026
Policy Review Approved By	Sion Thomas	01/09/2026