Child Protection and Safeguarding Policy

Reviewed by	**Nathan Slater, Headteacher**
Checked by	**Daniel Pallett, Executive Headteacher**
Date reviewed:	**September 2026**
Next Review date:	**September 2027, or sooner if legislation or guidance changes**

This policy should be read in conjunction with the following school policies and procedures:

- Allegations Against Staff Policy
- Anti-Bullying Policy
- Online Safety Policy
- Promoting Good Behaviour and Discipline Policy
- Curriculum Policy
- PSHE Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- Missing from Home/Absconding Policy
- Complaints Policy
- Health and Safety Policy
- Child Sexual Exploitation (CSE) Policy
- Allergy Safety Policy
- Restrictive Intervention and Positive Behaviour Support Procedures
- Attendance Policy
- Mobile Phone and Smart Technology Policy

Key Contacts for safeguarding and child protection policies and procedures can be accessed through

Derby City

- First Contact (Initial Response Team): **01332 641172**

Derbyshire

- Starting Point Consultation and Advice Service for Professionals: **01629 535353**
- Starting Point (Immediate Safeguarding / Child Protection Concerns): **01629 533190**

Derby and Derbyshire Safeguarding Children Partnership (DDSCP)

- Online Procedures: https://derbyshirescp.trixonline.co.uk/

Designated safeguarding lead:

Nathan Slater (Headteacher)

Deputy designated safeguarding lead:

David Torrance (Assistant Head)
Sarah Leech (Family Support Worker)

This policy has been updated in response to Keeping Children Safe in Education 2026

Contents

1.	Policy Statement
2.	Introduction
3.	Legal Framework
4.	Roles and Responsibilities
5.	Definitions and Signs of Abuse
6.	Safeguarding Referral Procedure
7.	Managing Allegations against Staff
8.	Promoting Good Behaviour and Discipline
9.	Inter-Agency Working, Information Sharing and Confidentiality
10.	Power and Position of Trust
11.	Child Centred Approach
12.	Whistle Blowing
13.	Induction and Training
14.	Safer Recruitment
15.	Missing Children
16.	Homelessness
17.	County Lines Criminal Activity
18.	Pupils with Family Members in Prison
19.	Pupils Required to give Evidence in Court
20.	Contextual Safeguarding
21.	Alternative Provision
22.	Work Experience
23.	Private Fostering
24.	Bullying
25.	Online Safety (Including Remote Learning)
26.	Sports Clubs and Extra Curricular Activities

27.	Risk Assessment
28.	Recording and Reporting
29.	Evaluation and Monitoring
30.	Key Documents and Policies

Appendices

1 a	Nagging Doubt form
1 b	Serious Concern Form
2	Chronology of Events Form
3	Signs of Abuse
4	Do's and Don'ts of Disclosure
5	Contact Details and Links to Useful Organisations

1 Policy Statement

1.1 Smoothstone Care and Education is fully committed to safeguarding the welfare of all children and young people. It recognises its responsibility to take all reasonable steps to promote safe practice and to protect and prevent children from harm, abuse, exploitation and discrimination.

Jasmine Hall School acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse or harm.

All Jasmine Hall School staff and volunteers will endeavour to work together through our policies, practices and procedures to encourage the development of an ethos which embraces difference and diversity and respects the rights of children, young people and adults in its care.

1.2 To fulfil their commitment to safeguard and promote the welfare of children and young people, all Jasmine Hall School organisations that provide services for, or work with children and young people must have:

- Clear priorities for safeguarding and promoting the welfare of children and young people, explicitly stated in strategic policy documents
- Arrangements in place to effectively implement the Prevent Strategy and Duty
- Arrangements in place to comply with statutory and mandatory requirements
- A clear commitment by senior management to the importance of safeguarding and promoting children and young people's welfare
- A clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children and young people
- Recruitment and human resources management procedures that take account of the need to safeguard and promote the welfare of children and young people, including arrangements for appropriate checks on all staff and volunteers
- Procedures for dealing with allegations of abuse against members of staff and volunteers
- Arrangements to ensure that all staff undertake appropriate training to equip them to carry out their responsibilities effectively, and to keep this up-to-date by refresher training at regular intervals
- Procedures to ensure that all staff, including temporary staff, governor's and volunteers who work with children and young people, are made aware of the establishment's arrangements for safeguarding and promoting the welfare of children and young people
- Policies for safeguarding and promoting the welfare of children and young people and procedures that are in accordance with guidance and locally agreed inter-agency procedures
- Arrangements to work effectively with other organisations to safeguard and promote the welfare of children and young people, including arrangements for sharing information

- A clear commitment to develop and implement systems that enable children and young people to use online and mobile technology safely and reduce the risks of potentially harmful behaviours

- A clear commitment to ensure children are treated fairly, protected and free from discrimination on the grounds of race, religion, gender, age, disability and sexual orientation

- A culture of listening to and engaging in dialogue with children and young people - seeking their views in ways that are appropriate to their age and understanding, and taking account of those views in individual decisions and in the establishment or development of services

- Definitive whistle-blowing procedures, and a culture that enables issues about safeguarding and promoting the welfare of children and young people to be addressed

1.3 The principles upon which the Safeguarding Policy is based are:

- The welfare of a child or young person will always be paramount

- The welfare of families will be promoted

- The rights, wishes and feelings of children, young people and their families will be respected and listened to

- Keeping children and young people safe from harm requires people who work with children and young people to share information

- Those people in positions of responsibility within the organisation will work in accordance with the interests of children and young people and follow the policy outlined below

1.4 This document is written in accordance with the Children Acts 1989 and 2004, the Education Act 2002, Working Together to Safeguard Children (2026), Keeping Children Safe in Education (2026), the Human Rights Act 1998, the Equality Act 2010, the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, together with Derby and Derbyshire Safeguarding Children Partnership procedures. Children Act 2004, section 16LA (Duty to share information), inserted by section 4 of the Children's Wellbeing and Schools Act 2026. In force from 30 September 2026.

Mandy Clarke
Chair of the Proprietor Body:
September 2026

2 Introduction

2.1 Jasmine Hall School staff fully recognise their primary responsibilities are to protect and safeguard the welfare of children and young people. The school and home recognises its legal duty under s175 Education Act 2002 (section 157 in relation to independent schools and academies) and the 1989 Children Act and takes seriously its responsibilities to protect and safeguard the interests of all children and young people. This organisation recognises that effective child protection work requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in reporting and responding to child protection situations.

Jasmine Hall School recognises and accepts that the School, and their staff form part of a wider safeguarding system for children, and that promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, schools and their staff should make sure their approach is child centred, this means that they should consider, at all times, what is in the BEST INTERESTS of the child.

Jasmine Hall and its staff do not always have a full picture of a child's needs and circumstances, therefore they have a role and responsibility identifying concerns, sharing information and taking prompt action to provide support and help to children and families at the right time.

2.2 Jasmine Hall adopts the safeguarding definition in Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.

Safeguarding and promoting the welfare of children means:

- Protecting children and young people from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of children's and young people's health or development
- Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- Promoting children being brought up by their birth parents, or otherwise within their family network through an appropriate kinship care arrangement, wherever possible and where this is in their best interests.
- Effective safeguarding requires staff to understand and be sensitive to the economic, social, cultural and ethnic factors that may affect children and families.
- Providing help and support to meet the needs of children as soon as problems emerge

This document has regard to Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026 and is implemented in accordance with Derby and Derbyshire Safeguarding Children Partnership procedures.

2.3 It is a statutory requirement for all homes and schools to have a safeguarding policy which is published on the relevant website and is made available to parents and carers on

request. Parents and carers are made aware through the admission process that the Safeguarding Policy is referenced in the young person's guide the complaints policy and the school prospectus.

2.4 This Safeguarding Policy applies to Jasmine Hall School. It supports our commitment to provide caring and safe environments in which all children and young people can develop socially, emotionally, physically and educationally and in which all children, young people and staff feel safe, secure and valued. The principles and characteristics of The Equality Act 2010 underpin the Home and Schools policies, procedures and practices.

2.5 Children and young people with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Jasmine Hall and its staff should ensure the child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. Jasmine Hall and its staff have responsibility to protect and safeguard the welfare of vulnerable children and young people who because of their needs are more at risk of abuse than non-disabled children and young people. Many of the children and young people we educate have lifelong developmental disabilities, complex learning needs and autism. Some will be able to manage everyday activities while others will require a lifetime care and specialist support. To protect and safeguard the welfare of children and young people in our care we need to understand their needs:

The school recognises the definition of *learning disability* set out by the Department of Health (2001), which states that a learning disability meets three criteria:

- A significantly reduced ability to understand new or complex information, to learn new skills (impaired intelligence);
- A reduced ability to cope independently (impaired social functioning); and
- The condition started before adulthood and has a lasting effect on development.

(Source: Department of Health, 2001 — Valuing People: A New Strategy for Learning Disability for the 21st Century)

As mentioned above, autism is another area of difficulty for our children and young people. There are three main areas of difficulty that children and young people with autism share which are sometimes known as the 'triad of impairments', they are:

- Social interaction; difficulty recognising or understanding other people's emotions and feelings and expressing their own, which may make it difficult for them to fit in socially. They may spend time alone, not seeking the company of others and appear to behave inappropriately, as it is not always easy for them to express feelings, emotions or needs

- Social communication; difficulty with verbal and non-verbal language. Many have a very literal understanding of language, and think people always mean what they say. They find it difficult to use or understand facial expressions or tone of voice, jokes and sarcasm, or common phrases and saying

- Social imagination; difficulty in understanding and interpreting other people's thoughts and feelings, predict what will happen next, understand the concept of danger, engage in imaginative play and activities or prepare and cope with change

We therefore have challenges, given the range and complexity of need within our school population and how we recognise the signs; symptoms and indicators of all aspects of abuse

and how we can best prevent and protect children and young people's welfare. Children and young people with autism or a learning disability experience communication difficulty, therefore have significant issues expressing their feelings, including disclosures of abuse. We also need to develop a range of strategies that identify the indicators of abuse within our complex population, and support disclosure of abuse. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
Jasmine Hall School and its staff are aware of the potential indicators of abuse, although there is a potential risk of staff becoming over familiar with the behaviour's a child or young person with autism and learning disabilities present. This means they may be at risk of failing to recognise a change in behaviour, either new or extension of existing behaviours, and concerns.

Barriers that exist when recognising abuse and neglect in these groups of children and young people include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury that relate to the child's disability without further exploration
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying including cyber bullying, without outwardly showing any signs
- children and young people with limited communication present challenges and barriers to disclosure

Strategies to enable disclosure of abuse with children and young people with autism and learning disabilities:

- staff should be familiar with the child or young person preferred communication methods and the way their autism and/or learning disability presents, e.g. signs, symbols, social stories and pictorial representation
- staff should be supported in the above area by specialist staff e.g. SALT
- specific programmes supported by SALT to help in the teaching of 'who' questions e.g. Who, When. Along with more specific sessions teaching key vocabulary around feelings and body parts
- regular communication with Parents/Carers to be alert to changes in behavioural presentation and health concerns
- discussions with other key professionals around changes in behaviour and presentation

2.6 This policy shall meet the requirements of the Education (Independent School Standards) Regulations 2014, as amended

2.7 Underpinning Values

Where there is a safeguarding issue, Jasmine Hall will work in accordance with the principles set out in this policy and those outlined in the Derby and Derbyshire Safeguarding Children Partnership procedures:

- A child's welfare is paramount. Each child has a right to be protected from harm and exploitation and to have their welfare safeguarded

- Each child is unique. Action taken by schools and their staff should always act in the child's BEST interest and should be child-centred, taking account of a child's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and any special needs

- Children, parents and other carers should be made aware of their responsibilities and their rights, together with advice about the power of professionals to intervene in their family circumstances

- Individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children's welfare. However, it may not be appropriate to advise parents/carers immediately about a referral depending on circumstances and the advice given by Children's Social Care. The welfare of the child is paramount in such situations

- Each child has a right to be consulted about actions taken by others on his/her behalf in an age-appropriate way. The concerns of children and their families should be listened to and due consideration given to their understanding, wishes and feelings. However, it may not always be possible to respect a child/carer's request for confidentiality. If a child may be at risk of significant harm, there is a duty on the school to share information with Children's Social Care in the area that the event or incident took place. If the incident or event has taken place within Derby City, then Derbyshire Safeguarding Partnership and the pupil's home local authority children's services need to be informed. The Local Authority Designated Officer (LADO) should be notified via **01332 642376** and **cpmduty@derby.gov.uk** if the concern relates to a member of school staff, governor, or volunteer. This will be explained to the child or family, and appropriate reassurance given.

Personal information is handled confidentially and shared only with those who need it to safeguard or promote the welfare of the child. Where the Information Sharing Duty applies, it is shared without needing permission (see section 9).

- Professionals should be aware of the effects of outside intervention upon children, upon family life and the impact and implications of what they say and do

- Explanations by professionals to children, their families and other carers should be plainly stated and jargon-free. Unavoidable technical and professional terminology should be explained in simple terms

- Sound professional practice is based upon positive inter-agency collaboration, evidence-based research and effective supervision and evaluation

- Universal services, community-based early help and the targeted early help level of Family Help are used to provide support as soon as problems emerge. Where statutory intervention may be required, referrals will be made promptly under the Children Act 1989 and in accordance with local threshold and assessment arrangements.

2.8 Pupil Voice and Feeling Safe

Jasmine Hall School actively seeks and values the views of pupils in relation to safeguarding and feeling safe. Due to the complex communication needs of many of our pupils, a range of approaches are used to support pupils to express their views in ways that are meaningful to them.

These include, but are not limited to:

- regular key-worker and trusted adult sessions
- the use of visual supports, symbols, social stories and alternative communication methods
- observations of behaviour, emotional regulation and presentation as indicators of wellbeing
- therapeutic input where appropriate
- discussions within PSHE, RSHE and daily learning
- engagement with parents and carers to support understanding of pupils' experiences

Leaders monitor safeguarding concerns, behaviour patterns and pupil wellbeing to ensure that pupils feel safe and that concerns are identified and responded to promptly. Where pupils are unable to verbalise concerns, staff use professional judgement and knowledge of the pupil to act in the pupil's best interests.

3. Legal framework

See page 68 for a full list of legislation and guidance documents used and referenced within this policy.

4. Roles and Responsibilities

4.1 All staff working at Jasmine Hall School have a statutory duty and shared responsibility to safeguard and protect the welfare of children and young people.

4.2 The Directors of Smoothstone Care and Education through Designated Safeguarding Leads (DSL) have responsibility for:

- Ensuring Jasmine Hall staff operate and practice in line with the organisations safeguarding policies and procedures that comply with Derby and Derbyshire Safeguarding Children Partnership Procedures.
- The DSL acts as the main point of contact with the three safeguarding partners.

- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Ensure that staff members have due regard to relevant data protection principles which allow them to share personal information.
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, and the timelines for Derby and Derbyshire Safeguarding Children Partnership.
- Providing the necessary support and resources to enable children and young people to thrive, develop and remain safe through at least good standards of education.
- Reporting on a monthly basis an overview of safeguarding concerns and issues, actions taken and any potential implications for future practice
- Organising a safeguarding audit, with the designated safeguarding leads and ensuring recommendations have been effectively implemented through monthly monitoring visits
- Providing support and resources to the staff involved in managing safeguarding issues, as the organisation acknowledges how stressful safeguarding situations are e.g. providing additional staffing or therapy if required
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- To review the organisation's safeguarding policy twice annually**, September and January**
- Appoint a member of staff from the senior leadership team (SLT) to the role of DSL as an explicit part of the role-holder's job description – there should always be cover for the DSL.
- Adhere to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Guarantee that volunteers are appropriately supervised.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- Guarantee that there are procedures in place to handle allegations against other pupils. Make sure that pupils' wishes or feelings are taken into account when determining what action to take, and what services to provide to protect individual pupils.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish clear procedures for universal support, community-based early help and referrals to the targeted early help level of Family Help, and ensure all staff understand their role.
- Appoint a designated teacher to promote the educational achievement of looked after children (LAC) and ensure that this person has undergone appropriate training.

- Ensure that the designated teacher works with the virtual school head to discuss how the pupil premium funding can best be used to support LAC.
- Put in place appropriate safeguarding responses for children who are absent from education, particularly where absence is repeated or prolonged, and act promptly where patterns may indicate abuse, neglect, exploitation, mental health need or another safeguarding risk.
- Ensure that all members of the governing body and Directors have been subject to an enhanced DBS check.
- Within the Governance process, there are procedures that monitor the systems to safeguard children who go missing on a repeated basis and those at risk of abuse and sexual exploitation. Governors monitor these issues and ensure staff take appropriate action, on a regular basis. Governors receive regular training to equip then to challenge the safeguarding practices in the school.
- To ensure Jasmine Hall's policies and procedures comply with the current Education Inspection Framework, the Independent School Inspection Toolkit and the Education (Independent School Standards) Regulations 2014, as amended

4.3 Where there is a concern or allegation about the Headteacher, staff must report this immediately to Mandy Clarke, Chair of the Proprietor Body, at mandy.clarke@newreflexions.co.uk or on 01939 210040 / 07748 923234.
Where there is a concern or allegation about Mandy Clarke, staff must report this immediately to the Derby City Local Authority Designated Officer (LADO).

4.4 The Headteacher has responsibility for:

- Ensuring the organisation's safeguarding policies and procedures are effectively embedded in the culture of the school and are compliant with Derby and Derbyshire Safeguarding Children Partnership Procedures and relevant legislation e.g. Working Together to Safeguard Children 2026 and Keeping Children Safe in Education 2026

- Provide staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Code of Conduct, part one of the 'Keeping children safe in education' (KCSIE) guidance, Promoting Positive Behavioural Policy, the Children Missing from Education Policy, online safety training, and the identity of the DSL and any deputies.

- Ensuring the school delivers a curriculum which promotes the prevention of and protection from child abuse or harm for example ensuring children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through PSHE and through relationship, sex and health education (RSHE).

- Ensuring policies and procedures are in place to protect children from harm on work experience placements.

- Ensuring that there is a Designated Safeguarding Lead on the Senior Leadership Team, with the appropriate training and time and support to fulfil their role and responsibilities

- Ensuring there are trained Deputy Designated Safeguarding Leads (DDSLs): David Torrance (Assistant Head) and Sarah Leech (Family Support).

- Ensuring all staff and volunteers are trained, and receive regular updates in the definitions and signs of abuse, and are conversant with their safeguarding duties, and have sound knowledge of the referral process and always act in the BEST INTERESTS of the child

- Ensuring that there is a designated manager of allegations against staff, normally a member of the senior leadership team and that they implement the procedures within the Allegations against Staff Policy

- To ensure confidentiality protocols are respected and that information is shared with the relevant agencies and personnel

- To ensure safeguarding practices and procedures, prevent, protect and support children and young people from the risks of harm and potential abuse

- To ensure any child or young person who has been subject to harm or abuse receives the support required including hospital treatment

- To ensure that Jasmine Hall staff contribute to inter-agency working as part of its statutory duty, recognising particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE) and child criminal exploitation (CCE)

- The Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 do not prevent the sharing of information where this is necessary and proportionate to safeguard and promote the welfare of children. Staff will share information appropriately, lawfully and securely, record the rationale for their decision, and consider the risks associated with sharing, or not sharing, information.

- Ensuring that all staff, including agency staff and volunteers, are aware of the Derby City Local Authority Designated Officer (LADO) contact details through the Child Protection and Safeguarding Policy, staff induction, safeguarding training, regular briefings and staff noticeboards.

4.5 The Designated Safeguarding Lead (DSL) is responsible for:

The DSL must be a member of the Senior Leadership Team (SLT) and take lead responsibility for safeguarding and child protection.
Designated Safeguarding Lead: Nathan Slater (Headteacher).

- Refer all cases of suspected abuse to Children's Social Care, the LA designated officer (LADO) for child protection concerns, the DBS, and the police in cases where a crime has been committed. Local Authority Designated Officer (LADO) who can be contacted in Derby on 01332 642376

- Understand, and keep up-to-date with multi-agency arrangement of three safeguarding partners.

- Act as the main point of contact with Derby and Derbyshire Safeguarding Children Partnership, and with the three safeguarding partners following completion of the transition period.

- Liaise with the Headteacher to inform him/her of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Understand the assessment process for providing early help and intervention.
- Support staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate.
- Keep cases of early help under constant review and refer them to the Children's Social Care if the situation does not appear to be improving.
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference, and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands Jasmine Hall Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Ensuring that the DSL/Deputy DSL is always available throughout the day

Robust cover arrangements will be maintained during school hours and for school-arranged activities. Staff will be given a confidential, monitored safeguarding contact route, including a shared safeguarding mailbox accessible only to the DSL team, and clear emergency escalation arrangements. The DSL retains overall responsibility when tasks are delegated.

- Ensuring that any Deputy DSLs on site trained to the same level as the DSL.
- Ensuring that The DSL retains overall responsibility for safeguarding even when the activities associated with the role are delegated to deputies
- Ensuring that children and young people who are at risk of harm or who have been potentially abused are immediately protected and safe from harm or abuse (DSL to reinforce with all staff the difference between a concern and immediate danger or risk of harm)

- Ensuring they have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

- Referring cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency as required; and refer cases where a crime may have been committed to the Police as required

- If the concerns or alleged abuse relate to the child or young person's home life, then the DSL should contact the relevant local Children's Services team. At the point of referral, the DSL should seek advice with regards contacting parents/carers

- After a referral, staff must follow the advice of children's social care and continue to take any immediate, proportionate action needed to keep the child safe. Staff must not investigate the allegation themselves, but must continue to record, share and escalate new information without delay.

- Providing a full written record of the referral and accurate chronology **(Appendix 2, Chronology and Record of Events Form)** outlining communication and actions taken to the local area Children's Services team within 24 hours

- Ensuring that all records are maintained confidentially, securely and separately from other children and young person's records. Access to the confidential records is restricted to the DSLs.

- Providing support and guidance to staff on safeguarding issues

- Ensuring that the DSL or Deputy DSL attends case conferences, CORE groups or other multi agency planning meetings, contributes to assessments and provides a report that has been shared with the parents

- Liaising with other agencies and professionals (e.g. contact details of local Children's Services team)

- Making and recording decisions to share, or not share, information under the Information Sharing Duty, including any decision that sharing would be more harmful to the child than not sharing, which is agreed with the Headteacher. Responding promptly to requests for information from other relevant organisations.

- **Derby and Derbyshire Safeguarding Children Partnership – 01332 642351**

- Work with the directors and governing body to ensure that Jasmine Hall School Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.
- Ensure the Child Protection and Safeguarding Policy is available publicly, and parents/carers are aware that Jasmine Hall Staff may make referrals for suspected cases of abuse or neglect, as well as the role the home and school plays in these referrals.
- Link with the Derby and Derbyshire Safeguarding Children Partnership to make sure that staff members are aware of the training opportunities available and made aware of the latest local policies on safeguarding.
- Ensure that a young person's child protection file is copied when transferring to a new home or school.
- The designated teacher has responsibility for promoting the educational achievement of looked after children (LAC), previously looked after children, and children who have left care through adoption, special guardianship or child arrangements orders, or who were adopted from state care outside England and Wales.
- For further information about the role and responsibilities of the Designated Safeguarding Lead (DSL), refer to Annex B: *Role of the Designated Safeguarding Lead* in *Keeping Children Safe in Education* 2026.

4.6 **The Staff** at Jasmine Hall are responsible for:

- Supporting and delivering a curriculum which promotes the prevention of and protection from child abuse or harm.

- Providing safe stimulating education through positive professional relationships promoting the prevention of and protection from child abuse and harm.

- Supporting the home and school in providing an atmosphere and ethos in which pupils feel secure and are encouraged to talk and be listened to

- Listening to any child who approaches them wishing to share worries and concerns and to act in their best interests
- Staff should be prepared to identify children who may benefit from universal services, community-based early help or the targeted early help level of Family Help, and should act as soon as a concern or need is identified.
- Staff should understand the lawful bases and relevant processing conditions for sharing safeguarding information, including personal data and special category data. Consent is not required where there is another lawful basis for sharing information to safeguard and promote the welfare of children.
- Staff should be able to support other professionals with community-based early help and Family Help assessments and plans, including contributing relevant information and monitoring agreed support.
- Being supportive of children and young people, while helping them understand that they cannot guarantee absolute confidentiality
- Being alert to any signs of abuse or harm in the children and young people they have contact with
- **Immediately reporting any nagging doubts, both verbally and in writing (see Appendix 1a: Nagging Doubt), to the DSL or a Deputy Designated Safeguarding Lead (DDSL). Nagging doubts must also be recorded on Sleuth.**
- **Serious concerns should be reported immediately, both orally and in writing, to the Designated Safeguarding Lead (DSL), Nathan Slater, or, in their absence, to the Deputy DSL's, David Torrance and Sarah Leech.**

If the DSL or a deputy is not available, staff must not delay taking action. They should contact the relevant local authority children's social care service directly: Derby First Contact on 01332 641172, Derbyshire Call Derbyshire on 01629 533190 for urgent child protection concerns, or the child's home local authority children's social care service. Where a child is in immediate danger or is at risk of immediate harm, staff should contact the police by dialling 999. The concern and any action taken must also be reported to the DSL or a deputy as soon as possible.

- Understanding that individual staff with concerns may refer to the local children's services directly
- Taking part in safeguarding training provided by Jasmine Hall on child protection and specific safeguarding issues identified in Keeping Children Safe in Education 2026. In particular staff knowledge of filtering and monitoring systems that the school use.
- Understanding and practising the home and school's safeguarding procedures
- Having an awareness of safeguarding issues- some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and making or sharing nudes or semi-nudes put children in danger

- Being aware that child-on-child abuse, including harassment and violence, is a safeguarding issue for both the victim and the child alleged to have caused harm. It is preventable and may include bullying, cyberbullying, racism, misogyny or misandry, sexual harassment or violence, abuse in intimate relationships, serious physical harm or threats involving weapons, and the making or sharing of nudes or semi-nudes. Concerns must never be dismissed as banter or an inevitable part of growing up.

Further information on specific safeguarding issues is contained in Annex A of Keeping Children Safe in Education 2026.

Further safeguarding information and guidance for staff can be found through Derby and Derbyshire Safeguarding Children Partnership procedures and in Part One of Keeping Children Safe in Education 2026. All staff, including those who do not work directly with children, must read Part One in full.

5 Definitions and Signs of Abuse

5.1 What is child abuse?

The terms **"children"** and **"child"** refer to anyone under the age of 18. Child abuse is a form of maltreatment of a child or young person. Somebody may abuse or neglect a child or young person by inflicting harm or by failing to act to prevent harm. Children or young people may be abused in a family or institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

In accordance with *Keeping Children Safe in Education* (DfE, 2026), the term "sexual harassment" is used in this policy to describe any unwanted conduct of a sexual nature, whether online or offline, that violates a child's dignity, makes them feel intimidated, degraded or humiliated, or creates a hostile, sexualised or offensive environment.

There are four broad categories of child abuse (**Appendix 3, Signs of Abuse)**

1. Physical abuse
2. Emotional abuse
3. Sexual abuse
4. Neglect

All school staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Children who witness abuse or the ill treatment of others can also be impacted by its effects, by what they have seen, heard or felt

Mental Health

Staff should recognise that mental health needs may be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. They may also be a consequence of abuse, neglect, exploitation or trauma, or a factor that increases a child's vulnerability. Staff must not attempt to make a clinical diagnosis. Concerns about a child's safety, self-harm, suicidal thoughts, eating difficulties or a significant change in presentation

must be recorded and reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL). Safeguarding action must not be delayed while health support is being sought. Staff should listen to the child, consider any immediate risk, and seek advice from the DSL or a DDSL. The DSL or DDSL will coordinate support with parents or carers, children's social care, health, education and, where appropriate, emergency services, making an urgent referral where there is a risk of significant harm, self-harm or suicide.

5.2 General signs of abuse:

Abused children may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend. Anyone working with children or young people needs to be vigilant to the signs listed below.

Whilst these signs do not necessarily mean that a child is being abused, they probably indicate that the child or family is having some problems which should be investigated.

- Regularly experiencing nightmares or sleeping problems
- Changes in personality
- Outbursts of anger
- Changes in eating habits
- Showing an inexplicable fear of particular places or making excuses to avoid particular people
- Self-harming (includes head banging, scratching, cutting)
- Not receiving adequate medical attention after injuries
- Showing violence to animals, toys, peers or adults
- Knowledge of "adult issues" e.g. alcohol, drugs, sexual behaviour
- Lacking in confidence or often wary/anxious
- Regressing to the behaviour of younger children
- Regular flinching in response to sudden but harmless actions, e.g. someone raising a hand quickly

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

Signs and Symptoms of Physical abuse: It is normal for children to have cuts and bruises on their bodies caused by accidents which happen whilst they are moving about and/or playing. These are marks that have an acceptable and reasonable explanation.

Marks or injuries which do not have an acceptable explanation may indicate that a child has been abused. This may include:

Bruising:

- Bruises on the cheeks, ears, palms, arms and feet
- Bruises on the back, buttocks, tummy, hips and backs of legs
- Multiple bruises in clusters, usually on the upper arms or outer thighs
- Bruising which looks like it has been caused by fingers, a hand, or an object i.e. belt, shoe
- Large oval shaped bite marks

Burns or scalds:

- Any burns which have a clear shape of an object, e.g. cigarette burns
- Burns to the backs of hands, feet, legs, genitals, or buttocks

Other signs of physical abuse include multiple injuries (i.e. bruising, fractures) inflicted at different times. It is particularly concerning if parents/carers are unable to explain these injuries and it is not clear whether they took the child to receive medical treatment at the time of the injury.

Be vigilant to possible abuse if a child is frequently described as ill by their parent but does not have any symptoms which are obvious to others. In addition, the parent will be unable to provide details of a medical diagnosis for the child's apparent condition.

5.4 Emotional abuse: 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 a child 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 a 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 cyber bullying*), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

*Cyber bullying is a growing problem and includes:

- Sending threatening or disturbing text messages
- Homophobia, racism or sexism
- Making silent, hoax or abusive calls

- Creating and sharing embarrassing images or videos
- 'Trolling', the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children from online games, activities or friendship groups
- Setting up hate sites or groups about a particular child
- Encouraging young people to self-harm
- Voting for someone in an abusive poll
- Hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- Sending 'sexts' to pressure a child into sending images or other activity

Signs and Symptoms of Emotional abuse: It is important to remember that some children are naturally open and affectionate whilst others are quieter and more self-contained. Children also develop at different rates from one another and some may be slightly more or less advanced than other children in their age group. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child.

The following signs may indicate emotional abuse:

- Inappropriate knowledge of 'adult' matters such as sex, alcohol and drugs
- Extreme emotional outbursts
- Very low self-esteem, often with an inability to accept praise or to trust
- Lack of any sense of fun, over-serious or apathetic
- Excessive clingy or attention seeking behaviour
- Over-anxiety, either watchful and constantly checking or over-anxious to please
- Developmental delay, especially in speech
- Substantial failure to reach potential in learning, linked with lack of confidence, poor concentration and lack of pride in achievement
- Self-harming, compulsive rituals, stereotypic repetitive behaviour
- Unusual pattern of response to others showing emotions

5.5 Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening and whether or not violence is used. The activities may involve physical contact, including penetrative acts such as rape, assault by penetration and oral sex, or non-penetrative acts such as masturbation, kissing, rubbing and touching inside or outside clothing. They may also include non-contact activities, such

as involving children in the production of, or viewing, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse, including online. Sexual abuse can be committed by adults or by other children and is most commonly perpetrated by someone known to the child.

Signs and Symptoms of Sexual abuse: Sexual abuse often presents itself in a veiled way. Although some child victims have obvious genital injuries, a sexually transmitted disease or are pregnant, relatively few show such obvious signs.

Recognition of sexual abuse generally follows either a direct statement from the child (or very occasionally from the abuser), or more often, suspicion based on the child's circumstances, behaviour, or physical symptoms or signs.

The following list of commonly observed indicators is not exhaustive and there may be situations where none of them is present, even though a child is known to have been abused sexually. Equally, even if some are present it may also not be definitive of sexual abuse. These physical signs should alert professionals to the possibility of abuse. Suspicion increases where several features are present together.

Physical manifestations:

- Sexually transmitted diseases
- Pregnancy (especially in younger girls or when identity of father is uncertain)
- Genital lacerations or bruising
- Vaginal bleeding in prepubescent girls
- Abnormal dilation of vagina, anus or urethra
- Additional physical signs

Although these signs are not on their own indicative of sexual abuse, they include:

- Itching, redness, soreness
- Unexplained bleeding from vagina or anus
- Daytime wetting
- Faecal soiling or retention

Emotional and behavioural manifestations

Behaviour with sexual overtones (depending on age and understanding):

- Explicit or frequent sexual preoccupation in talk and play
- Sexual relationships with adults or other children
- Hinting at sexual activity or secrets through words, play or drawings

Children may also behave in the following ways:

- Withdrawn, fearful or aggressive behaviour to peers or adults
- Running away from home
- Suicide attempts and self-mutilation
- Child psychiatric problems, including behaviour problems, withdrawal from social contact, onset of wetting or soiling when previously dry and clean, severe sleep disturbances, arson (fire setting)
- Learning problems which do not match intellectual ability, or poor concentration (NB: for some sexually abused children, school may be a haven - they will arrive early, are reluctant to leave and perform well)
- Marked reluctance to participate in physical activity or to change clothes for PE, etc.

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

Signs and Symptoms of Neglect: It is important to remember that some children are very picky eaters whilst others may refuse to wear a coat regardless of how cold it is outside. A child may also appear to be underweight, but is, in fact, naturally thin.

Some of the most obvious signs of neglect (e.g. children being thin, dirty or not wearing a coat) are not in themselves indicators of abuse. However, if, over time, it is clear that a child is not receiving an adequate level of care and supervision appropriate to their age, it may indicate that the child is being neglected. The following are general and age-specific signs of neglect:

Further Signs of Neglect:

Hygiene

- Poor hygiene, frequently smelly or dirty and regularly have dirty and unwashed clothing

Health

- Untreated health and dental problems
- Poor muscle tone and prominent joints

- Poor skin; sores, rashes, flea bites, scabies and ringworm
- Thin swollen tummy
- Injuries caused by accidents, e.g. cuts or burns becoming infected
- Anaemia
- Incontinence
- Faltering growth and not reaching developmental milestones
- Recurring illness or infections

Nutrition

- Often hungry
- No breakfast

Development

- Being tired
- Withdrawn and unhappy
- Anxious and avoiding people
- Difficulty making friends
- Poor language and communication skills
- Poor social skills
- Missing school

5.7 Child Sexual Exploitation (CSE) and **Child Criminal Exploitation** (CCE): Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online'

Child criminal exploitation (CCE) and child sexual exploitation (CSE) may be committed or facilitated by an individual, an organised network or group, or a gang. Children may identify

as belonging to the group exploiting them, may be coerced into committing criminal offences, and may be criminalised for actions they have been forced or coerced to undertake. Child exploitation may constitute modern slavery. The Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) will consider whether a referral to the National Referral Mechanism (NRM) is appropriate and will follow current statutory guidance. Further guidance is contained in *Working Together to Safeguard Children* (2026) and *Keeping Children Safe in Education* (2026).

Signs and Symptoms of Child Sexual Exploitation, Child Criminal Exploitation: Sexual and Criminal exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse and some do not recognise that they are being exploited. However, there are a number of tell-tale signs that the child may be being groomed for sexual exploitation.

These include:

- Going missing for periods of time or regularly returning home late
- Regularly missing school or not taking part in education
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infection
- Mood swings or changes in emotional well-being
- Drug and alcohol misuse
- Displaying inappropriate sexualised behaviour

Children at Risk of Exploitation (CRE)

Child sexual exploitation can happen at any time and a child may not even realise it is happening to them. Many children may be at risk of exploitation and staff need to be aware of how to support them and recognise signs of risk as outlined above.

Child Victims of Trafficking

Trafficking of children is a form of human trafficking which means the recruitment, transportation, transfer, harbouring, and/or receipt of a child by means of a threat or use of force or other forms of coercion for the purposes of exploitation.

Trafficking specifically targets the child as an object of exploitation; the child may be unaware of their fate:

- Reason for trafficking children

- Sexual exploitation
- Domestic servitude
- Sweatshop, restaurant and other catering work
- Agricultural labour, including tending plants in illegal cannabis farms
- Benefit fraud
- Involvement in petty criminal activity
- Organ harvesting
- Drug mules, drug dealing or decoys for adult drug traffickers
- Illegal inter-country adoption

It is possible that unaccompanied asylum-seeking children (UASC) may have been trafficked into the UK and are likely to remain under the influence of their traffickers, even whilst they are looked after.

Any child who has been a victim of trafficking will have a risk assessment setting out how the child will be protected from any trafficker, to minimise any risk of traffickers being able to re-involve a child in exploitative activities. This plan should include contingency plans to be followed if the young person goes missing.

Signs that a child may be trafficked include:

- Is withdrawn and refuses to talk or appears afraid to talk to a person in authority
- Does not appear to have money but does have a mobile phone
- Possession of large amounts of money or expensive belongings with no plausible explanation
- Receives unexplained/unidentified phone calls whilst in placement
- Has a history with missing links and unexplained moves

Grooming

Grooming can happen in person, online and in gangs or groups.

Once they have established trust, groomers will exploit the relationship by isolating the child from friends or family and making the child feel dependent on them. They will use any means of power or control to make a child believe they have no choice but to do what they want.

Groomers may introduce 'secrets' as a way to control or frighten the child. Sometimes they will blackmail the child, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

Groomers can use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a young person or child.

They can spend time learning about a young person's interests from their online profiles and then use this knowledge to help them build up a relationship.

It's easy for groomers to hide their identity online - they may pretend to be a child and then chat and become 'friends' with children they are targeting.

Groomers may look for:

- usernames or comments that are flirtatious or have a sexual meaning
- public comments that suggest a child has low self-esteem or is vulnerable

Groomers don't always target a particular child. Sometimes they will send messages to hundreds of young people and wait to see who responds.

Groomers no longer need to meet children in real life to abuse them. Increasingly, groomers are sexually exploiting their victims by persuading them to take part in online sexual activity.

Groomers may be male or female. They could be any age.

Many children and young people don't understand that they have been groomed, or that what has happened is abuse.

Grooming can be more than just one single person, it can happen in gangs or groups of people who are of both the same, and different, age, ethnicity, religion and social backgrounds.

For further guidance please refer to www.nspcc.org.uk

Serious Violence

Staff will be alert to the indicators and risk factors associated with serious violence, including individual, family, peer, school and community factors. These may include changes in attendance, repeated absence or suspension, unexplained injuries or gifts, association with gangs or organised criminal networks, carrying weapons, threats, exploitation and escalating harmful behaviour. The school will respond through a child-centred safeguarding assessment, appropriate information sharing and timely multi-agency working, recognising that children may be both victims and perpetrators of serious violence or criminal exploitation.

Through safeguarding training, all staff will be made aware of the indicators that may suggest a child is at risk of, or involved in, serious violence. These indicators include, but are not limited to, the following:

When responding to concerns, the school will consider the child's individual circumstances and wider context, including the possibility of exploitation, coercion, carrying weapons, involvement with gangs or organised criminal networks, online activity, repeated absence, suspension, exclusion and changes in peer relationships. A child who appears to have committed an offence may also be a victim of criminal exploitation or modern slavery and must receive a child-centred safeguarding response.

- Increased absence from school
- A change in friendships
- New relationships with older individuals or groups
- A significant decline in academic performance

- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions

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

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour

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

5.7 A Domestic abuse, coercive control and abuse in intimate relationships

Abuse in intimate and teenage relationships may include physical, sexual and emotional abuse, coercive and controlling behaviour, stalking, harassment, technology-facilitated abuse and financial abuse. Children can be victims in their own relationships and may also experience the effects of domestic abuse within the home as victims in their own right. Concerns must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) and assessed in the context of the child's safety, wishes, relationships and any risks to themselves or others.

Child-to-parent or caregiver abuse may include physical, emotional or sexual abuse, threats, intimidation, coercive control, damage to property or financial abuse. It remains a safeguarding concern for the child displaying the behaviour, as well as for other children and adults affected. Staff must not treat it solely as poor behaviour or a private family matter.

These forms of harm may occur together and may be linked to racism, misogyny, misandry, homophobia, biphobia, transphobia, disability discrimination or other forms of prejudice. Staff must consider the child's identity, communication needs and wider context without allowing assumptions, stereotypes or unconscious bias to minimise risk.

5.8 Honour Based Violence including Female Genital Mutilation and Forced Marriage.

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Female genital mutilation (FGM) is the partial or total removal of external female genitalia or other injury to the female genital organs for non-medical reasons. It's also known as female circumcision, cutting or Sunna.

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child

abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.

There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

FGM is a hidden crime, so we don't know exactly how common it is. Even partial removal or 'nipping' can risk serious health problems for girls and women.

FGM is usually performed by someone with no medical training. Girls are given no anaesthetic, no antiseptic treatment and are often forcibly restrained. The cutting is made using instruments such as a knife, pair of scissors, scalpel, glass or razor blade.

Girls are more at risk if FGM has been carried out on their mother, sister or a member of their extended family.

A girl at immediate risk of FGM may not know what's going to happen. But she might talk about:

- being taken 'home' to visit family
- a special occasion to 'become a woman'
- an older female relative visiting the UK

She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

A girl or woman who has had FGM may:-

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear

FGM can be extremely painful and dangerous. It can cause:

- severe pain
- shock
- bleeding
- infection such as tetanus, HIV and hepatitis B and C
- organ damage
- blood loss and infections that can cause death in some cases

Long-term effects

Girls and women who have had FGM may have problems that continue through adulthood, including:

- difficulties urinating or incontinence
- frequent or chronic vaginal, pelvic or urinary infections
- menstrual problems
- kidney damage and possible failure
- cysts and abscesses
- pain when having sex
- infertility
- complications during pregnancy and childbirth
- emotional and mental health problems

Staff can also seek advice from the NSPCC FGM Helpline on 0800 028 3550.

- Jasmine Hall School is an 'open environment', where children and young people feel able to discuss issues that they may be facing;
- the Designated Safeguarding Leads are aware of the issues surrounding FGM and Forced Marriage;
- advice and signposting is available for accessing additional help, e.g. the NSPCC's helpline, Childline services, Forced Marriage Unit;
- Awareness raising about FGM is incorporated in the school's safeguarding training. In addition, staff are also made aware of the changes to Forced Marriage Guidance March 2023

If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

- All staff must report FGM concerns promptly to the Designated Safeguarding Lead or a deputy. Concerns that a pupil is at risk of FGM must be referred to children's social care, even where the pupil does not consent. Where a teacher, including an unqualified teacher employed or engaged to carry out teaching work, discovers through a direct disclosure by a girl under 18 or through observing physical signs that FGM appears to have been carried out, they have a personal statutory duty to report this directly to the police. Reporting to the Designated Safeguarding Lead does not replace this duty. Staff must not examine pupils for evidence of FGM.
- Not to consult or discuss with the pupil's parents or family, or others within the community.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girls being at risk from FGM, or already having suffered from FGM.

There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines and chapter 9 of those guidelines (p42-44) focuses on the role of schools and colleges.

Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives Government powers to issue statutory guidance on FGM to relevant persons.

Section 5B of the Female Genital Mutilation Act 2003 places a personal statutory duty on teachers, regulated healthcare professionals and social workers to report known cases of FGM in girls under 18 directly to the police. All school staff must report FGM concerns promptly through the school's safeguarding procedures. Reporting to the DSL does not replace a teacher's personal reporting duty.

If a teacher, in the course of their professional duties, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they must report this to the police. Teachers who fail to report such cases may face disciplinary action.

For further information, refer to Annex A of *Keeping Children Safe in Education* 2026.

5.9 Vulnerable to Extremism and Radicalisation

Extremism and radicalisation is another part of safeguarding children and young people. As with any concern, the risk of harm and abuse is raised when young people are vulnerable and is often noticed when children and young people change their behaviour, clothing or attitudes. One aspect of safeguarding children and young people from radicalisation is to set out in 'Promoting fundamental British values as part of SMSC in schools. This guidance sets out British values as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- The tolerance of those with different faiths and values

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and which specific needs for which an extremist or terrorist group may appear to provide and answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviours which could indicate that they may be in need of help or protection. Staff should

use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

The Government Prevent Strategy is the approach to reducing the risk of terrorism; this is called '**CONTEST**' and has four parts:

- **Protect;** to strengthen protection against a terrorist attack
- **Prepare;** to mitigate the impact of a attack
- **Pursue;** to stop terrorist attacks
- **Prevent;** to stop people becoming terrorists or supporting terrorism

Definition of terrorism

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Calls for the death of members of the British armed forces are also included in this definition.

From July 1 2015, specified authorities, including all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the prevent duty. It applied to a wide range of public-facing bodies. Bodies to which the duty applies MUST HAVE REGARD TO STATUTORY GUIDANCE ISSUES UNDER SECTION 29 OF THE CTSA 2015 (the prevent guidance) Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools.

Extremism takes many forms and all ideologies are included in this area of safeguarding:

- Islamic extremism
- Left wing extremism
- Right wing extremism
- Animal rights extremism

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children

who may be at risk of radicalisation. These procedures may be set out in existing safeguarding policies on implementing the Prevent Duty.

- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Derby and Derbyshire Safeguarding Children Partnership.

- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. The school filtering is provided by Swift comms who manage the school firewall (Watchguard Firebox), the polices on this are regularly reviewed and updated, additional on-site blocking of websites can be actioned by Senior Staff It is also important that schools teach pupils about Online-Safety more generally, including fake news, misinformation, disinformation and conspiracy theories.

The Department for Education has also PUBLISHED ADVICE FOR SCHOOLS ON THE PREVENT DUTY. The advice is intended to complement the Prevent Guidance and signposts other sources of advice and support.

Staff should understand when it is appropriate to make a referral to the Channel Programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Section 36 of the Counter-Terrorism and Security Act (CTSA) 2015 places a duty on local authorities to ensure that Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism and, where considered appropriate and the necessary consent has been obtained, arrange for support to be provided. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in carrying out its functions and with the police by providing information about a referred individual. Schools and colleges that are required to have regard to *Keeping Children Safe in Education* 2026 are listed in the CTSA 2015 as partners required to co-operate with local Channel panels.

Channel Programme (making a referral)
Staff should understand when it is appropriate to make a referral to the Channel Programme. (All staff at Jasmine Hall complete online Channel Awareness Training). Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for

schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Working with Derby City – Local Authority Guidance and Arrangements

Our local Channel panel is set up to offer help and guidance to people who may be at risk of becoming involved in extremism.

Channel seeks to:

• Establish an effective multi-agency referral and intervention process to identify vulnerable individuals; First Contact Team Derby 01332 641 172

• Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist related activity;

• Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Jasmine Hall School follows procedures for managing all safeguarding concerns in direct relation to vulnerable people at risk of becoming involved in extremist activity as set out in Derby City's overview of the Channel initiative.

Making a Referral to the Derby Prevent Team

If a member of staff identifies concerns that a pupil (or any other person) may be vulnerable to radicalisation or extremism, they must complete a School Initial Record of Concerns Form (Appendix 1b) and pass it immediately to the Designated Safeguarding Lead (DSL) / School Prevent Lead or a Deputy Designated Safeguarding Lead (DDSL).

Where there are concerns that an individual is at risk of being drawn into extremism or radicalisation, the DSL / School Prevent Lead or a DDSL will complete and submit the online Police Prevent Referral Form.

If there is an immediate safeguarding risk, the DSL / School Prevent Lead or a DDSL will contact Derbyshire Police on 101 (or 999 in an emergency) and Derby First Contact on 01332 641172.

For advice, contact:

- Derbyshire Prevent Team: 01629 535646 or prevent@derbyshire.gov.uk
- Derby Prevent Team: Prevent@derby.gov.uk
- Police Prevent Team (radicalisation/extremism): 101 or 0300 122 8694 (999 in an emergency)
- Concerns about an adult working in an education setting: Report concerns via the Department for Education's Report Extremism in Education service.

Following a referral, the Prevent Team will assess the information, determine the level of risk and, where appropriate, coordinate the most appropriate support and intervention for the individual.

Prevent Lead and Staff Training at Jasmine Hall

The Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Leads (DDSLs) and other relevant senior leaders will complete Home Office Prevent training, including the Prevent Awareness, Prevent Referrals and Channel Awareness modules, which replace the previous Workshop to Raise Awareness of Prevent (WRAP) training.

In addition, all staff, including teaching, support, agency and voluntary staff, will complete an approved Prevent awareness training programme, such as The Prevent Duty online course, to ensure they understand how to recognise, respond to and report concerns relating to radicalisation and extremism.
Nathan Slater, Headteacher, is the named Prevent Lead for Jasmine Hall School. The Prevent Lead has overall responsibility for ensuring the school meets its duties under the Prevent Duty Guidance for England and Wales, including providing advice and support to staff, overseeing referrals and acting as the main point of contact with external agencies.

Indicators of vulnerability (signs and symptoms) include:

Identity

- Children and young people is distanced from their cultural/religious heritage and experiences
- Discomfort about their place in society
- Personal crises, the children and young people may be experiencing family tensions
- A sense of isolation
- Low self-esteem
- They may be disassociated from their existing friendship group and become involved with a new and different group of friends
- They may be searching for answers to questions about their identity, faith and belonging

Personal Circumstances

- Migration
- Local community tensions and events affecting the Children and Young People's country of origin may contribute to a sense of grievance that is triggered by a personal experience of racism or discrimination or aspects of Government policy

Unmet Aspirations

- children and young people may have perceptions of injustice
- A feeling of failure
- Rejection of civic life

Experiences of Criminality

- Involvement with criminal groups
- Imprisonment and poor resettlement/reintegration on release

Special Educational Needs

- Social interaction
- Empathy with others
- Understanding the consequences of their actions; and awareness of the motivation of others

More Critical Risk factors could include;

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation, resulting in issues of identity crises and/or personal crises

De-radicalisation

- All-inclusive ethos
- Create doubt or disillusionment
- Question ideas
- Safe discussions
- Range of views

5.10 Bullying (including cyber-bullying): See also Jasmine Hall School Anti-Bullying Policy and procedures and Online-Safety Policy.

Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see or can be subtle and insidious. It can take many forms, but the three main types are:

- Physical – e.g. hitting, kicking, theft
- Verbal – e.g. racist or homophobic remarks, threats, name calling

- Psychological – e.g. excluding from social groups and activities, spreading hurtful rumours

5.11 Allegations of abuse made by other children (Child on child Abuse)

- Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a pupil's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence

  Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

  Child on child Abuse can include (but is not limited to):

  - Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - abuse within intimate partner relationships;
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment;
  - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos;
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a 138 third party;
  - upskirting and initiation/hazing type violence and rituals.

  Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Sexual harassment includes:

- Sexual comments.
- Sexual "jokes" and taunting, online sexual harassment
- Physical behaviour, such as deliberately brushing against another pupil.
- Up-skirting (Voyeurism Offences Act, 2019)
- Sexting
- Initiation/hazing type violence or rituals

Sexual violence refers to the three following offences:

Rape: A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents

Assault by Penetration: A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the

penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents

Sexual Assault: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents

Harmful sexual behaviours

The term "**harmful sexual behaviour"** is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND. We recognise that SEND children are 3 times more at risk of harmful sexual behaviour.

Online sexual harassment, including the non-consensual sharing of nude and semi-nude images and/or videos, and the consensual sharing of nude and semi-nude images and/or videos (often referred to as making, sending or sharing nudes or semi-nudes), inappropriate comments on social media, sexual exploitation, coercion and threats. Online sexual harassment may be an isolated incident or part of a wider pattern of abuse.

- Jasmine Hall staff should recognise that children are capable of abusing their peers. Jasmine Hall should ensure their child protection policy includes procedures to minimise the risk of child-on-child abuse and sets out how allegations of child-on-child abuse will be investigated and dealt with. The policy should reflect the different forms child on child abuse can take, make clear that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". It should be clear as to how victims of child-on-child abuse will be supported.

- Child-on-child abuse can manifest itself in many ways. The Department for Education provides guidance on *Searching, Screening and Confiscation* for schools. The UK Council for Internet Safety (UKCIS) has published *Sharing nudes and semi-nudes: advice for education settings working with children and young people*. Through the Science, PSHE and RSHE curriculum, pupils will be taught about child-on-child abuse, harmful

sexual behaviour, healthy relationships, consent and how to seek help if they experience any form of abuse.

- Jasmine Hall staff should be vigilant and aware of potential of child-on-child abuse both in education and residential settings. Reporting and recording of these incidents are essential in the continuing protection of all children and young people in our care. All Education staff will receive training and updates from the DSL and also complete EDUCARE training on Harmful Sexual Behaviours.

Information about a child who may pose a risk to other children is shared with relevant organisations under the Information Sharing Duty, without consent, even where that child is not at risk themselves. We share it to safeguard every child involved, including the child who may pose the risk.

5.12 Children at Potentially Greater Risk of Harm

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Lesbian, gay and bisexual children may be targeted by other children, and children who are perceived to be lesbian, gay or bisexual can be equally vulnerable. These risks may be compounded where a child lacks a trusted adult. Jasmine Hall promotes an inclusive culture, challenges homophobic, biphobic, misogynistic and misandrist behaviour, and provides safe opportunities for children to speak to a trusted adult.

Where a child is questioning their gender, staff will take a cautious, child-centred and safeguarding-led approach that considers the child's individual needs, mental health, family context and risk of bullying. Parents or carers will ordinarily be involved unless there is a clear safeguarding reason not to do so. Any support provided will be consistent with current statutory guidance, the school's duties under the Equality Act 2010, and the child's best interests.

6. Safeguarding Referral Procedure

If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy.

6.1 The first steps to be taken should a member of staff have reasonable cause to suspect that a **child or young person is suffering or is likely to suffer significant harm is to ensure the immediate safety of that child or young person and others who may be judged to be at risk of abuse.**

Consultation must take place with the Designated Safeguarding Lead (or named deputy) who will be the most appropriate person to initiate any referral, or the member of staff may make a referral directly to the host local authority for the child in question i.e. **Derby City First Contact Team 01332 641172 or Derbyshire Starting Point 01629 533190**

- **A written record of nagging doubts should be made using the schools internal recording system SLEUTH (If staff cannot access SLEUTH, they can use Appendix 1a Nagging Doubt form). This should then be given to a Designated Safeguarding Lead (or Deputy if DSL unavailable) who will then make the decision whether a referral is needed to the Derby First Contact Team or the child's existing social worker. If the child lives in an authority outside of Derbyshire, the matter will also be referred by the Designated Safeguarding Lead to the relevant Children's Social Care team in that area**

- **If a member of staff has serious concerns or that a child is at significant risk of harm they must immediately inform the lead DSL or in their absence the Deputy DSL or inform the host local authority for the child in question i.e. Derby City First Contact Team 01332 641172 or Derbyshire Starting Point 01629 533190. They should also complete school's Serious Concerns Form (Appendix 1b)**

6.2 The person who first encounters a case of alleged or suspected abuse is not responsible for deciding whether or not abuse has occurred and should not conduct an investigation to establish whether the child is telling the truth. The role of the person to whom a child **makes a disclosure or allegation** is to act promptly on the information they have received by following identified procedure below and immediately informing the DSL. The Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information is shared appropriately.

6.3 If a child makes a disclosure or allegation (see **Appendix 4, Do's and Don'ts of Managing a Disclosure**) you should:

- Stay calm and listen carefully to what is said. You do not need a 'witness'
- Carefully explain that it is likely that the information will need to be shared with others - do not promise to keep secrets
- Allow the child to continue at her/his own pace and do not interrupt if they are freely recalling events
- Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer. Questions should be framed in an open manner and not 'lead' the child in any way. For example, say, "Tell me what has happened", rather than, "Did s/he do…"

- Reassure the child that s/he has done the right thing in telling you. Explain what you will do next and with whom the information will be shared
- Do not ask the child to repeat the disclosure to anyone else in school or ask him/her to write a 'statement'
- Contact your DSL as soon as you can or, where such contact is not possible, ensure a referral is made without delay to the local children's services team
- Record in writing what was said, including the child's own words, as soon as possible – note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated **(See Appendix 1a, Nagging Doubt form or Serious Concern Form 1b) This information should also be recorded on SLEUTH**
- Do not discuss with other staff parents/carers without agreeing with the DSL first

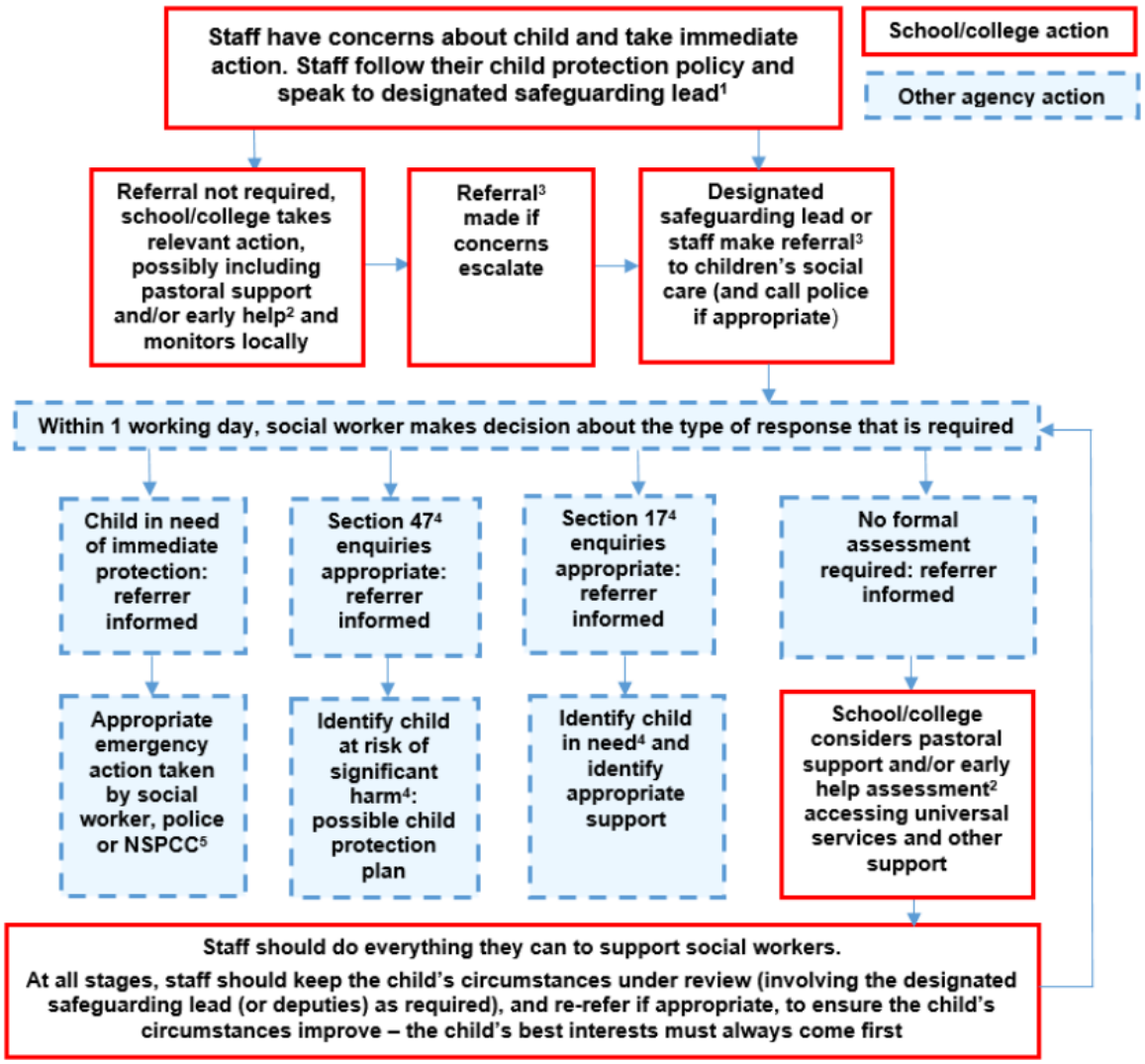
6.4 Guidance on Information Sharing is available, in the following document:

Information sharing is governed by the Information Sharing Duty under section 16LA of the Children Act 2004 and its statutory guidance (DfE, September 2026). See section 9.

6.5 A referral should always be made following a **restrictive physical intervention** if any of the following criteria applies:

- A child or young person is injured or makes an allegation that they have been harmed by an adult
- The child or young person wishes to complain about the manner that they have been restrained
- The parent/ carer of the child or young person makes a complaint on behalf of the child or young person about the use of the restrictive physical intervention
- The referral to the local children's services and the LADO is managed by the person responsible for managing allegations against staff, initially the DSL – see the Allegation against staff policy

6.6 This flowchart illustrates the action that staff, volunteers and consultants should take if they have concerns about the welfare of a child or young person. If, at any stage, there is a risk of immediate serious harm to a child or young person, a referral must be made immediately to the relevant local authority Children's Services team. Where a child is in immediate danger, staff should contact the police by dialling 999.



1. In cases that also involve an allegation of abuse against a member of staff, see Part Four of *Keeping Children Safe in Education* 2026.
2. Support before statutory intervention may be provided through universal services, community-based early help or the targeted early help level of Family Help. Where needs are coordinated across agencies, an assessment and plan should be completed in line with *Working Together to Safeguard Children* 2026 and local protocols. Staff must refer directly to children's social care where a child is suffering, or is likely to suffer, significant harm.
3. Under the Children Act 1989, local authorities are required to provide services for children in need to safeguard and promote their welfare. This includes assessments under Section 17 (children in need) and Section 47 (where there is reasonable cause to suspect a child is

suffering, or is likely to suffer, significant harm). Further information is available in Chapter One of *Working Together to Safeguard Children* 2026.
4. This could include applying for an Emergency Protection Order (EPO).

Responding to concerns relating to Sexual Exploitation and Trafficking
If a practitioner is concerned that a child or young person is involved or likely to be involved in sexual exploitation and / or trafficking, they should immediately refer to the DSL who will make a Referral to Children's Social Care.

If the child or young person has (or is awaiting allocation of) a social worker, the duty team should send the referral to the named social worker, or in their absence the team manager. Sending all sexual exploitation referrals to the duty teams enables Children's Social Care to ensure a coordinated response.

Jasmine Hall recognise, at all stages, the need for urgent action that may be necessary to secure the child or young person's safety.

Should the DSL have concerns that they would like to discuss prior to a referral, they can do so by consulting with Smoothstone Care and Education Directors or with the key contact in Children's Social Care. All professionals are encouraged to seek advice if they are not sure there is sufficient 'evidence' or are not sure about the possible risk indicators

In relation to confidentiality, where there are concerns that a child or young person is subject to sexual exploitation/trafficking, all agencies have a responsibility to report their concerns and share information. The need for a child or young person to be safeguarded overrides their right to confidentiality. Data protection should not prevent the sharing of information but ensures that relevant information is shared appropriately.

6.7 Thresholds for Intervention:

Early Help

Support should be provided as soon as concerns emerge through **universal services**, community-based early help or, where targeted multi-agency support is required, the **targeted early help level of Family Help.**

Any pupil may benefit from early help. Staff will be particularly alert to the potential need for early help for pupils who:

- have special educational needs and/or disabilities (SEND), whether or not they have an Education, Health and Care (EHC) Plan;
- are young carers; or
- have emerging safeguarding, welfare, attendance, mental health or family needs that may require additional support.

Young carers may have additional safeguarding, attendance, wellbeing and educational needs. Staff will identify and listen to young carers, avoid assumptions about what they can manage, and coordinate appropriate support with the family and partner agencies.

Children with medical conditions, including allergies, may be more vulnerable where health needs affect attendance, communication, independence or access to support. Staff will follow individual healthcare plans, allergy management plans and the Jasmine Hall Allergy Safety Policy, while reporting any safeguarding concerns immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).

Children who are lesbian, gay or bisexual, or who are questioning their sexual orientation or gender, may face bullying, abuse, isolation or harmful online influences. Staff will provide a safe and trusted adult, listen without judgement, challenge discriminatory language and behaviour, and avoid making assumptions. Information will be handled sensitively and shared only where lawful, necessary and proportionate to safeguard the child. Staff will follow current statutory guidance and the school's Equality, Anti-Bullying and RSHE policies. Any safeguarding concerns will be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).

- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse, neglect or exploitation
- Are at risk of being radicalised or exploited.
- Are privately fostered.
- Suspensions and exclusions are a factor that should be considered when looking at early help

Early help will also be used to address non-violent harmful sexual behaviour and prevent escalation.

All staff will be made aware of local community-based early help and Family Help processes, local thresholds, and their responsibility to record, share and escalate safeguarding concerns.

The DSL / Family Support Lead will coordinate the school's contribution to community-based early help and Family Help, while recognising that, under local arrangements, a Family Help assessment or plan may be led by an appropriate practitioner from any relevant agency and is not restricted to social workers.

The DSL will apply the current Derby and Derbyshire Threshold Document and Assessment Protocol, consult the relevant local authority service where appropriate, and coordinate the school's contribution. Support for pupils with SEND will remain person-centred and outcomes-

focused. Safeguarding and Family Help processes will complement, rather than replace, duties under the Children and Families Act 2014 and the SEND Code of Practice.

Child in Need – Section 17 of the Children Act 1989:

A referral for a Section 17 Child in Need assessment should be considered where a child's needs require statutory social work assessment or support, including where needs are complex or relate to disability. The Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) will follow local thresholds and will not delay a referral where statutory intervention may be required.
Section 17 of the Children Act 1989 states that a child is in need if:

- they are unlikely to achieve or maintain, or have the opportunity to achieve or maintain, a reasonable standard of health or development without the provision of services by a local authority;
- their health or development is likely to be significantly impaired, or further impaired, without the provision of such services; or
- they are disabled.

Where the DSL or DDSL considers that the child's welfare indicates that a Section 17 Child in Need referral is appropriate, they will discuss the referral with the parents or carers where it is safe to do so. Consent is not needed to share information or make the referral, and a referral will not be delayed or withheld because a parent disagrees.
Appropriate school staff will participate in Child in Need (CIN) meetings and contribute to assessments, plans and reviews where requested by children's social care.
Some children with acute or complex needs (see the Derby and Derbyshire Safeguarding Children Partnership Threshold Document and local procedures) may require Section 17 Child in Need support.

Child Protection:

Section 47 of the Children Act 1989 says the Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others. Staff from Jasmine Hall do not investigate whether a child has been abused. This is the duty of social workers from the Safeguarding team and the police. All staff refer reasonable concerns which indicate that a child may be at risk of significant harm.

It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under S.47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development.

In order to both understand and evidence 'significant harm', it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition,

communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

If staff have significant concerns about any child, they must make them known to the Designated or Deputy Designated Safeguarding Leads without delay in accordance with reporting and recording procedures.

7. Managing Allegations Against Staff, Supply Teachers, Trainee Teachers, Volunteers and Contractors

7.1 This section applies to safeguarding concerns or allegations about staff, supply teachers, trainee teachers, volunteers and contractors, including concerns that meet the harm threshold and low-level concerns.

The school shares safeguarding responsibilities with employers and training providers and will not cease safeguarding action simply because an individual is supplied, contracted or on placement. The Headteacher or Proprietor will consult the Local Authority Designated Officer (LADO) where the harm threshold may be met, or where advice is required.

The harm threshold is met where an adult has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against, or related to, a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour outside work (including online behaviour) that may pose a transferable risk to children.

All allegations will be managed in accordance with the school's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff.

Where an allegation is substantiated and the individual is dismissed, resigns, or otherwise ceases to provide their services, the school will make a referral to the Disclosure and Barring Service (DBS) where the legal duty to do so is met. The school will also consider whether a referral to the Teaching Regulation Agency (TRA) is required for consideration of a prohibition order.

If the case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may share those concerns with Derby First Contact or Derbyshire Starting Point, as appropriate.

7.2 We are aware of the possibility of allegations being made against members of staff or volunteers that are working with or may come into contact with children and young people at Jasmine Hall School. Such allegations are usually that some kind of abuse has taken place. They can be made by children and young people or other concerned adults.

- If an allegation is made, the member of staff receiving the allegation will immediately inform the Head teacher or the Assistant Head if the Head teacher is not present
- The DSL or Head teacher should on all such occasions follow the procedures of the **Derby and Derbyshire Safeguarding Children Partnership Procedures**, and inform the Local Authority Designated Officer
- If the allegation made concerns the Headteacher the person receiving the allegation will immediately inform **Mandy Clarke, Chair of the Proprietor Body** who will consult the LADO as above, without notifying the Headteacher first
- The DSL or Head teacher will discuss with the LADO the nature of the allegations in order for appropriate action to be taken. This may constitute an initial evaluation meeting or strategy discussion depending on the allegation being made.

7.3 The Head teacher and lead DSL will also:

- Consider the safeguarding arrangements of the child or young person to ensure they are not in contact with the alleged abuser
- Contact the parents or carers of the child/young person if advised to do so by the LADO
- Consider the rights of the staff member for a fair and equal process of investigation and provide support
- Ensure that the appropriate disciplinary procedure is followed, including whether suspending a member of staff from work until the outcome of any investigation is deemed necessary i.e. where there is cause to suspect a child or other children at the school is/are at risk of harm or the case is so serious that it might be grounds for dismissal
- Act on any decision made in any Section 47 strategy meeting - The decision of the strategy/Joint evaluation meeting could be: investigation by children's social care, police investigation if there is a criminal element to the allegation, single agency investigation completed by the school which should involve professional HR advice.
- Inform the Disclosure and Barring Service (DBS) where a member of staff has been disciplined or dismissed as a result of the allegations founded, or would have been if they have resigned
- Ensure that a clear comprehensive summary of the allegation, details of the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personal file of the accused and a copy provided to the person concerned
- Jasmine Hall School have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to

bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual.

For further details, see Managing Allegations against staff Policy

Protecting Yourself Against Allegations of Abuse

Keeping Children Safe in Education (DfE, 2026) states that all staff should be aware of the systems within their school that support safeguarding and that these should be explained as part of staff induction.

This includes the school's Staff Behaviour Policy (Code of Conduct). The school's Code of Conduct is set out in the Staff Handbook and is based on the Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2022).

Staff should keep their professional conduct and boundaries under regular review and seek to minimise the risk of situations in which misunderstandings could arise. The following sensible precautions should be taken when working alone with children:

- Work in a room where there is a glass panel in the door, or leave the door open where appropriate.
- Ensure that other adults visit the room occasionally.
- Avoid working in isolation with children unless appropriate safeguards have been considered.
- Never give out personal mobile telephone numbers or personal email addresses.
- Do not give pupils lifts in your own vehicle unless this has been authorised by the Headteacher or another senior leader in accordance with the school's procedures.
- Do not arrange to meet pupils outside school activities.
- Never communicate or become "friends" with pupils through personal social media accounts or online platforms.

Under the Sexual Offences Act 2003, it is a criminal offence for a person in a position of trust to engage in sexual activity with a child or young person under the age of 18 where the position of trust legislation applies.

8. Promoting Good Behaviour and Discipline

At Jasmine Hall School we aim to promote positive social, emotional and behavioural change in our children and young people through a supportive and consistent approach across education and care based on their needs. Our positive behaviour strategy is a holistic person-centred approach to the development of our children and young people, based on effective evidence-based teaching and learning.

Many of children and young people exhibit and display behaviours that act as barriers to learning and inclusion. An integral part of our holistic approaches is to overcome those barriers.

We aim to provide a consistent, supportive and well supervised environment, where children and young people feel safe, secure and reach their potential through the promotion of positive relationships.

Many of our children and young people display a variety of challenging behaviours which are managed by a range of strategies, including the use of Restrictive Physical Interventions, in order to reduce risk. Staff are principally encouraged to adopt different methods of de-escalation via appropriate training and the promotion of positive relationships. By using a range of positive behaviour management strategies, we aim to create an environment where all parties are kept safe, but also encourages children to be involved in the process of being reflective about their behaviour.

Restrictive Physical Intervention

8.1 The use of physical intervention should, wherever possible, be avoided. It should only be used where it is lawful, necessary and proportionate to prevent injury to a pupil or another person, prevent serious damage to property, or in other exceptional circumstances permitted by law.

8.2 When physical intervention is used, it should be undertaken in a way that maintains the safety and dignity of all concerned. The scale and nature of any physical intervention must be proportionate to both the behaviour of the individual and the nature of the harm they may cause.

8.3 Restrictive intervention is any planned or reactive act that restricts a pupil's movement, liberty or freedom to act independently. Reasonable force is one form of restrictive intervention. It may be used only when lawful, necessary and proportionate, using the minimum force for the shortest time required to prevent harm or, where permitted by law, serious disruption or damage. It must never be used as punishment, to cause pain, humiliation or distress, or simply to secure compliance.

"Reasonable force uses the minimum degree of force necessary for the shortest period of time to prevent a pupil from harming themselves, others or property."

8.4 Staff will prioritise prevention, communication, reasonable adjustments and de-escalation. Any intervention will take account of the pupil's SEND, communication, medical needs, trauma, protected characteristics and individual risk assessment. Particular care will be taken where an intervention may affect breathing, circulation, dignity or emotional safety. Pupils must not be restrained in a way that compromises their airway, breathing or circulation. If a pupil is unintentionally held on the ground, staff should release their holds or reposition them into a safer alternative or standing position as quickly as possible.

8.5 Restrictive interventions will be carried out only by staff acting within the law, their competence and school training. Incidents will be recorded promptly and factually in accordance with statutory requirements, parents or carers informed as soon as reasonably practicable, the pupil offered an opportunity to communicate their experience, and the incident reviewed to reduce the likelihood of recurrence. The Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) will consider whether the circumstances indicate abuse, require consultation with the Local Authority Designated

Officer (LADO), a referral to children's social care, or another safeguarding response. Practice will follow the Department for Education guidance *Restrictive Interventions, including the Use of Reasonable Force in Schools* (effective 1 April 2026) and the school's Behaviour Policy and Restrictive Intervention procedures.

8.6 All staff at Jasmine Hall receive annual Team Teach training. Training places a strong emphasis on prevention, positive behaviour support, communication, de-escalation, and the safe, lawful and proportionate use of restrictive intervention.

9. Inter-agency Working, Information Sharing and Confidentiality

9.1

- The school contributes to inter-agency working as part of its statutory guidance
- The school will work with First Contact (Derby), Starting Point (Derbyshire), the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support.
- Where a need for early help is identified, the school will allow access for First Contact (Derby), Starting Point (Derbyshire) and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.
- The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.
- Staff members are aware that whilst the GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.
- Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils.
- If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL.
- The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE) and child criminal exploitation (CCE)
- DSLs must keep detailed, accurate and secure written records of all concerns, discussions and decisions, including the rationale for those decisions. Records must include instances where referrals were, or were not, made to other agencies, including children's social care, the Local Authority Designated Officer (LADO), the police or Prevent, together with the reasons for those decisions.

The Information Sharing Duty

The duty. Since 30 September 2026 Jasmine Hall School has a legal duty under section 16LA of the Children Act 2004 to share information it holds about a child, or about another person connected to that child, where we consider the information is relevant to safeguarding or promoting the child's welfare and that sharing it may help another relevant organisation to assess need or risk, make a decision, provide support or take action. Relevant organisations include local authority children's social care, the police, health services, youth justice services and other schools and education settings. The duty applies in the same way when one of those organisations asks us for information.

No threshold. Information is shared whether or not the child meets the threshold for a child protection enquiry, a Child in Need assessment or any local threshold. The duty covers early help, emerging needs and prevention as well as risk of harm. Staff never wait for a concern to "meet threshold" before passing it to the Designated Safeguarding Lead (DSL).

Consent. Consent is not needed to share information under the duty, and it is not needed under data protection law or the common law duty of confidentiality when the duty applies. Staff will not ask a child or parent for permission to share where the school will share anyway, because that gives them a choice they do not have. Instead, where it is safe and practicable, the DSL tells the child and their parents or carers what is being shared, with whom and why, in a way that suits the child's age, understanding and communication needs. Where telling the family would increase risk to the child or anyone else, we do not tell them, we record why, and we let the receiving organisation know the family is not aware.

Deciding whether to share. The DSL, or a Deputy DSL in their absence, considers three questions:

1. Is the information relevant to the child's safety or welfare?

2. Is the recipient covered by the duty, and could the information help them safeguard or promote the welfare of the child, including where the child may pose a risk to others?

3. Would sharing be more harmful to the child than not sharing, and can that harm be reduced by sharing less detail?

When we will not share. We will only decide not to share in rare cases where sharing would be more harmful to the child than not sharing. This would normally mean that sharing would put the child at immediate risk of harm, would undermine a police investigation in a way that increases the risk to a child, or would breach a Family Court order or the Family Procedure Rules. Before deciding not to share, the DSL will consider whether a reduced or summarised version can be shared instead. Any decision not to share is agreed with the Headteacher, recorded with the reasons and reviewed, and the information is shared as soon as the risk allows.

The following are not reasons to withhold information: no consent from the child or family; a parent objecting; fear of a complaint or criticism; a member of staff feeling unsure or uncomfortable; or general data protection concerns. A member of staff who is unsure speaks to the DSL the same day.

Information about other people. The duty covers information about adults and other children in a child's life where it is relevant to that child's safety or welfare, for example a parent's circumstances that affect their care of the child, or a peer who may pose a risk. Information about a pupil who may pose a risk to other children is shared under the duty even where that pupil is not at risk themselves. We also consider that pupil's own needs when we share.

Requests from other organisations. Any request for information from another relevant organisation is passed to the DSL on the day it arrives and answered promptly. We share the relevant information, extracted or summarised where that is enough, rather than whole files, unless the full record is necessary and proportionate. When we ask another organisation for information, we give them enough context to decide what is relevant.

Information we receive. Information shared with us under the duty is used only for safeguarding and promoting children's welfare. The DSL acknowledges it and, where appropriate, tells the sender what action we have taken.

Moving between areas. When a pupil moves to another school or area in England, the DSL shares relevant safeguarding information with the new setting and, where relevant, the receiving local authority, as well as transferring the child protection file. A data sharing agreement is not needed before sharing under the duty, and the lack of one will never delay it. Sharing with services in Scotland, Wales or Northern Ireland falls outside the duty and is done under data protection law.

Learners aged 18 and over. The duty applies to children under 18. For learners aged 18 or over we share information through our adult safeguarding procedures.

Emergencies. Where a child is at immediate risk, staff share what is needed at once with the police or children's social care and record their decision afterwards.

Recording. Every decision to share or not to share is recorded on Sleuth: what was shared, with whom, when, the reasons against the three questions above, and whether the child and family were told. Opinion is recorded as opinion and kept separate from fact.

Local arrangements. We share information through the routes agreed by our local safeguarding partnership and set out in Appendix 6, and in line with the partnership's data sharing agreement once it is revised for the duty. For a child who lives in another area, we use that area's routes.

Data protection. Sharing under the duty is lawful under data protection law. Our lawful basis is Article 6(1)(c) UK GDPR (legal obligation under section 16LA of the Children Act 2004). For special category data and criminal offence data we rely on Article 9(2)(g) and Schedule 1, paragraph 18 of the Data Protection Act 2018 (safeguarding of children and individuals at risk). Information is limited to what is necessary, accurate and sent securely. Staff unsure about a data protection point ask the DSL or the Data Protection Officer, but that question never delays sharing.

Other duties to share. The Information Sharing Duty sits alongside our other legal duties to report, including the mandatory reporting of female genital mutilation. When the mandatory duty to report child sexual abuse under the Crime and Policing Act 2026 comes into force, this policy will be updated to include it.

9.2 Confidentiality

- We recognise that all matters relating to child protection are confidential.
- Confidentiality is an issue that needs to be understood by all those working with children, particularly in the context of child protection. This is a complex area and involves consideration of a number of pieces of legislation.
- Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts. However, any disclosure of personal information to others, including children's social care departments, must always have regard to both common and statute law.
- Safeguarding information is shared lawfully, securely and on a need-to-know basis under the Information Sharing Duty and data protection law. Consent is not required, and staff will not ask for it where the school will share anyway. Staff can never promise a child or adult that information about a child's safety or welfare will be kept secret. Decisions to share, or not share, are recorded with the reasons.
- The law requires the disclosure of confidential information necessary to safeguard a child or children. Under Section 47 of the Children Act 1989 statutory agencies have a duty to co-operate. Therefore, if the Police or Social Care/Services are conducting a Section 47 investigation under the 1989 Children Act, staff must share requested information relevant to the investigation. Legal advice should be sought if in doubt from the County Legal Services Department.
- When children transfer to a new school or college at any time other than key transition points (e.g. move to primary or high school), it may be necessary to inform other partners.
- The Headteacher or DSL will disclose personal information about a pupil to other members of staff on a need-to-know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- All staff must be aware that they cannot promise a child that they will keep secrets where doing so may compromise the child's safety or wellbeing, or that of another person. Staff should always explain that information will only be shared with those who need to know in order to safeguard and promote the welfare of the child. Wherever appropriate, the school will seek to inform the child and their parents or carers before making a referral to children's social care, unless doing so would place the child at increased risk of harm or prejudice a police or criminal investigation. If in doubt, staff should consult the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL), who will seek advice from children's social care or the Derby and Derbyshire Safeguarding Children Partnership procedures where appropriate.
- Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection

file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival

As well as transferring the child protection file, the DSL shares relevant concerns with the receiving local authority when a pupil moves to another area in England, including a looked after child returning to their placing authority.

10. Power and Position of Trust

10.1 Jasmine Hall recognises that all adults working with children and young people are in positions of trust in relation to the children and young people in their care. A position of trust exists where an adult is in a position of power or influence over a child or young person by virtue of their work or the nature of their role. All staff must recognise the responsibility that this position brings and maintain appropriate professional boundaries at all times.
Please refer to *Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings* (February 2022).

10.2 All staff must uphold public trust in the teaching profession and maintain high standards of ethics and behaviour, within and outside the home and school, by:

- Treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to the member of staff's professional position
- Having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions

11. Child Centred Approach

11.1 Jasmine Hall staff recognise and understand that effective safeguarding systems are child centred. Children and young people in our school are clear what they want from an effective safeguarding system, we know this via our regular children and young people questionnaire feedback.

11.2 All our children want to be respected, their views to be heard, to have stable relationships with professionals built on trust and for consistent support provided for their individual needs. This guides the behaviour of our staff. Anyone working with children should see and speak to the child; listen to what they say; take their views seriously; and work with them collaboratively when deciding how to support their needs. A child-centred approach is supported by:

- The Equality Act 2010 which puts a responsibility on public authorities to have due regard to the need to eliminate discrimination and promote equality of opportunity. No child or group of children must be treated any less favourably than others in being able to access effective services which meet their particular needs; and
- The United Nations Convention on the Rights of the Child (UNCRC). This is an international agreement that protects the rights of children and provides a child-centred framework for the development of services to children

11.3 At Jasmine Hall School, we teach a broad and balanced PSHE curriculum that helps children and young people develop self-awareness, positive self-esteem and confidence. We encourage them to:

- Keep themselves and others safe
- Stay as healthy as possible
- Have worthwhile and fulfilling relationships
- Respect the differences between people
- Develop independence and responsibility
- Play an active role as members of a democratic society
- Make the most of their own abilities and those of others
- Behave in a socially and morally acceptable way including towards authority and each other
- To become involved in the life of their community
- To know about democracy and how to be an active citizen
- To know about economic wellbeing

Please refer to the school's Curriculum Statement and PSHE/RSE policy.

12 Whistle Blowing

12.1 Whistle blowing is the mechanism by which adults can voice their concerns, made in good faith, without fear of repercussion. Jasmine Hall School has a clear and accessible Whistle Blowing Policy that meets the terms of the Public Interest Disclosure Act 1998. Adults who use whistleblowing procedure are made aware that their employment rights are protected.

12.2 Staff must acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult this is particularly important where the welfare of children may be at risk.

12.3 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and that such concerns will be taken seriously by the senior leadership team.

12.4 Through the staff induction process, all staff are made aware of the school's Whistleblowing Policy and the procedures for raising concerns. Staff have a duty to raise concerns about the conduct or actions of colleagues where these may be inappropriate, unsafe or unsuitable. In the first instance, concerns should be raised with their line manager. Where this is not appropriate, or the concern relates to the line manager, staff should contact **Mandy Clarke, Chair of the Proprietor Body**.

12.5 Staff will be protected from harassment or victimisation, and no action will be taken against staff if the concern proves to be unfounded and was raised in good faith. Malicious allegations may be considered as a disciplinary offence.

12.6 The **NSPCC Whistleblowing Advice Line** is available for staff who do not feel able to raise concerns about child protection failures internally. Staff can contact the Advice Line on 0800 028 0285. The service is available 8:00am–8:00pm Monday to Friday and 9:00am–6:00pm at weekends. Staff can also email **help@nspcc.org.uk**

13. Induction and Training

13.1 When new staff, volunteers or regular visitors join our school they will be informed of the safeguarding arrangements in place. They will be given a copy of our school's Safeguarding Policy and told who the Senior Designated Lead and deputy for safeguarding are. They will also be provided with the recording form, given information on how to complete it and who to pass it to. The induction training will cover

- The Child Protection and Safeguarding Policy
- The Behavioural Policy
- The Staff Code of Conduct
- The safeguarding response to children who go missing from education
- The identity of the DSL and any deputies
- The role of the DSL and deputy DSLs

Training requirement	Timing
Briefing on the Information Sharing Duty: no threshold, no asking permission, passing concerns to the DSL the same day	Autumn term 2026, then at induction and in the annual safeguarding update

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

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep previously LAC safe.

The DSL and their deputy(s) will undergo online safety training to help them recognise the additional risks that pupils with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support pupils with SEND to stay safe online

Child criminal exploitation and the need to refer cases to the National Referral Mechanism

Training requirement	Timing
Read the Information Sharing Duty statutory guidance (DfE, September 2026) in full	On induction into role, then annually or when updated

13.2 Every new member of staff and volunteer will complete an induction programme that includes essential safeguarding information. This programme will include safeguarding procedures, the signs and indicators of abuse and neglect, how to respond to and manage a disclosure from a child, how to record and report safeguarding concerns, and the school's approach to confidentiality and information sharing. Following induction, all staff will have a

clear understanding of the definitions of emotional, physical, sexual and neglectful abuse, child sexual exploitation, and their safeguarding responsibilities. New staff will also be made aware of the **Derby and Derbyshire Safeguarding Children Partnership** procedures.

13.3 New staff that have not had any Child Protection/Safeguarding training will be provided with safeguarding awareness training through the induction process. Staff will be provided with Level one and two training and will be updated regularly and recorded. The Designated and Deputy Designated Safeguarding Leads will attend approved DSL Courses at Level 3 and above at least every 2 years in order to maintain continuous professional development and comply with statutory guidance.

13.4 All regular visitors and volunteers to our school will be given a set of our safeguarding procedures; they will be informed of whom our DSL and Deputy DSLs are. They will also be informed with reference recording and reporting procedures.

13.5 Jasmine Hall will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children in our school and home.

13.6 We actively encourage all of our staff at Jasmine Hall to keep up to date with the most recent local and national Safeguarding advice and guidance. All staff should now receive safeguarding updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This can be provided via, for example, email, e-bulletin and staff meetings.

13.7 The knowledge and skills of the DSL's and their deputy/deputies should now be updated at regular intervals, to ensure they keeps up with developments relevant to the role. This could be provided via, for example, e-bulletins, meeting other DSLs, or taking time to read about recent safeguarding developments.

14. Safer Recruitment

14.1 The Headteacher will ensure that safer recruitment practices are carried out in accordance with *Keeping Children Safe in Education* 2026. At least one member of every appointment panel will have completed appropriate safer recruitment training. The school will carry out online searches as part of its due diligence on shortlisted candidates and will inform candidates that these searches may be undertaken. The school will verify identity, qualifications and employment history, obtain and scrutinise references, and complete all required pre-employment checks, including prohibition from teaching, Section 128, right to work in the UK, overseas checks (where applicable) and Disclosure and Barring Service (DBS) checks before appointment, or in accordance with a formally assessed and managed exception.

14.2 Jasmine Hall will use the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview and verify the references accordingly. We will question the contents of application form e.g. breaks in employment history (including overseas), if we are unclear about them. We will undertake enhanced Disclosure and Barring Service checks and use any other means of ensuring we are recruiting and selecting the most suitable people to work with our children. Under no circumstances will we consider offering employment to anyone who is barred from working in schools under Section 128 of the Education and Skills Act 2008, including Proprietors and all Governors. Section 128 checks are carried out on all governors. All professional/Voluntary staff working with children in a regulated activity and this will be kept under regular review.

Identity checks will include evidence of right to work in the UK and teachers will be subject to prohibition from teaching checks.

14.3 We will maintain a Single Central Register of all safer recruitment checks carried out in line with statutory requirements and is signed off on a termly basis by the Headteacher. All members of the proprietor body are also recorded on the SCR.

14.4 Any staff member, volunteer or governor who becomes the subject of a police investigation in relation to physical or sexual offences against adults or children, or are charged with such a criminal offence, must inform the Head teacher. Staff must disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children whether received before, or during their employment at the school. The Head teacher or DSL will discuss any potential safeguarding matters with the LADO and any required action will be agreed.

14.5 Any staff member, volunteer or governor whose own children become subject to child protection investigations must inform the Head teacher. The Head teacher or DSL will discuss with the Local Authority Designated Officer (LADO) in regard to procedures for dealing with allegations against Persons who work in a position of trust with children. Appropriate action will be agreed.

14.6 Schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals should be made as soon as possible after the resignation or removal of the individual.

14.7 Jasmine Hall should ensure that any contractor, or any employee of the contractor, who is to work on the premises, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required.

14.8 Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity. Jasmine Hall managers are responsible for determining the appropriate level of supervision depending on the circumstances.

14.9 Jasmine Hall should ensure that individuals who have lived or worked outside the UK must undergo the same checks as all other staff in the school. In addition, Jasmine Hall School must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Further checks may include overseas criminal record checks and, for teaching positions, obtaining confirmation from the relevant overseas professional regulating authority about any sanctions, restrictions or suitability concerns, in accordance with Keeping Children Safe in Education 2026.

14.10 The Department for Education's Disclosure and Barring Service (DBS) Workforce Guides will be consulted when determining whether a role falls within the child workforce for the purposes of DBS eligibility.

References

References from internal candidates will always be scrutinised before appointment. References will only be accepted from a senior person and not from a colleague. References will be obtained prior to interviews taking place and discussed during interviews. Open testimonials will not be considered. Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source

For further information regarding Safer Recruitment, see Jasmine Hall Safer Recruitment Policy. Where applicants for ITT are salaried by the school, the school will ensure that enhanced DBS checks with barred list information are carried out. Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

The organisation requires enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees. Before an individual becomes a trustee, the school will carry out an enhanced DBS check and confirm their identity. Where a trustee also engages in regulated activity, a barred list check will also be requested. An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check. If the individual lives or has lived outside of the UK, consideration will be given as to further checks that may be necessary

On-going Suitability

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

14.11 Volunteers and Regulated Activity

Where the school accepts a DBS certificate obtained before appointment, it must be presented within 30 calendar days of its issue date unless the applicant is subscribed to the DBS Update Service and the required status check is completed. Identity and all other required checks must still be completed and recorded.

From 1 September 2026, the former supervision exemption from regulated activity no longer applies. A volunteer who teaches, trains, instructs, cares for or supervises children on more than three days in a 30-day period, or overnight, is in regulated activity whether supervised or not and requires an enhanced DBS check with children's barred list information. Volunteers providing relevant personal care are also in regulated activity. The school will determine whether the role constitutes regulated activity before appointment, obtain the appropriate checks and record the decision on the Single Central Record where required.

For volunteers whose role is not regulated activity, the school will undertake and record a proportionate risk assessment and obtain an enhanced DBS check without children's barred list information where legally permitted and appropriate. No unchecked volunteer will be placed in a role that amounts to regulated activity. Ongoing suitability will be kept under review and the duty to refer to the DBS applies to volunteers as well as paid staff.

If a risk assessment is undertaken to determine whether a volunteer should be subject to an enhanced DBS check, the assessment will be recorded.

14.12 Agency Staff

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been

received which indicates that all of the necessary checks have been conducted and the date that confirmation was received.

Appendix 5 (flowchart of Disclosure and Barring Service criminal record checks and barred list checks)

Please refer to the Jasmine Hall Safer Recruitment Policy.

15. Missing Children

15.1 Jasmine Hall recognises that safeguarding and promoting the welfare of children is a key duty and requires effective joint working between agencies and professionals. When a child goes missing or runs away they are at risk. Safeguarding children therefore includes protecting them from this risk.

15.2 Jasmine Hall refers to the definitions set out by the police force in April 2013. These are:

- Missing: anyone whose whereabouts cannot be established and where the circumstances are out of character, or the context suggests the person may be the subject of crime or at risk of harm to themselves or another; and
- Absent: a person not at a place where they are expected or required to be

15.3 The police classification of a person as 'missing' or 'absent' will be based on on-going risk assessment. Note that 'absent' within this definition would not include those defined as "away from placement without authorisation" above: a child whose whereabouts are known would not be treated as either 'missing' or 'absent' under the police definitions.

15.4 Jasmine Hall has procedures for managing children who are missing, preventative strategies, risk assessments, debriefing with children and young people when issues occur.

15.5 Attendance

All children are entitled to suitable, full-time education. Attendance is everyone's responsibility and absence may be a symptom of unmet need or a safeguarding risk. Jasmine Hall will build strong relationships with families, monitor attendance and punctuality daily, identify repeated or prolonged absence and concerning patterns, listen to the views of the child and their family, remove barriers to attendance and provide appropriate support. Where concerns persist or risk increases, the school will work with the local authority and other relevant agencies, make safeguarding referrals where appropriate, and follow the principles set out in *Working Together to Improve School Attendance* (2026).

A child going missing from education is a potential indicator of abuse or neglect. Staff should follow the procedures for dealing with children that go missing from education or home,

particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

Jasmine Hall safeguarding policies and procedures are in place for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The Law requires all schools to have an admission register and with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers.

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending

The school will notify the LA within five days of when a pupil's name is added to the admissions register

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur

Two emergency contact details will be held for each pupil where possible.

Jasmine Hall School will inform their local authority of any pupil who is going to be deleted from the admission register where they:

- Have been taken out of school by their parents and are being educated outside the school systems e.g. home education
- Have ceased to attend school and on longer live within reasonable distance of the school which they are registered
- Have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he or she nor his or her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age
- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period
- Have been permanently excluded
    - If a pupil is to be removed from the admissions register, the school will provide the LA with the following information The full name of the pupil
    - The full name and address of any parent with whom the pupil lives
    - At least one telephone number of the parent with whom the pupil lives
    - The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable

- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admission register under regulation 9 of the School Attendance (Pupil Registration) (England) Regulations 2024, as amended

The school will maintain admission and attendance registers and make all statutory returns and notifications in accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, as amended, and the statutory guidance *Working Together to Improve School Attendance* (2026).

The local authority must be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that the authorities can, as part of their duty to identify children of compulsory school age who are absent from education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

Jasmine Hall School will/must inform the local authority of any pupil who fails to attend school regularly, or have been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

16. Homelessness

Where the school is notified that a family with children has been placed in temporary accommodation, the DSL will consider the impact on safety, attendance, transport, health, privacy and access to education, liaise with the local authority and relevant services, and ensure support and safeguarding action are coordinated.

- The DSL and deputy(s) will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

- Indicators that a family may be at risk of homelessness include the following

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

- Referrals to the Local Housing Authority do not replace referrals to First Contact (Derby), Starting Point (Derbyshire) where a child is being harmed or at risk of harm

- For 16- and 17-year-olds, homelessness may not be family-based and referrals to First Contact (Derby), Starting Point (Derbyshire) will be made as necessary where concerns are raised.

17. County Lines Criminal Activity

- For the purpose of this policy, "**County lines criminal activity**" refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.
- Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.
- Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.
- The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.
- Indicators that a pupil may be involved in county lines active include the following:
    - Persistently going missing or being found out of their usual area
    - Unexplained acquisition of money, clothes or mobile phones
    - Excessive receipt of texts or phone calls
    - Relationships with controlling or older individuals or groups
    - Leaving home without explanation
    - Evidence of physical injury or assault that cannot be explained
    - Carrying weapons
    - Sudden decline in school results
    - Becoming isolated from peers or social networks
    - Self-harm or significant changes in mental state
    - Parental reports of concern

18. Pupils with Family Members in Prison

- Pupils with a family member in prison will be offered appropriate pastoral and emotional support, taking account of their individual needs and wishes.
- Where appropriate, pupils will be offered a copy of *Are You a Young Person with a Family Member in Prison?* (Action for Prisoners' and Offenders' Families) and given opportunities to discuss any questions or concerns with a trusted member of staff.

19. Pupils Required to give Evidence in Court

- Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.
- Pupils will also be provided with the booklet 'Going to Court' from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.
- Pupils will also be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

20. Contextualised Safeguarding (Extra Familial Harm)

- Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is known as contextual safeguarding.
- Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare
- The school will provide as much contextual information as possible when making referrals to First Contact (Derby), Starting Point (Derbyshire)

21. Alternative Provision and Off-Site Safeguarding

Where pupils attend alternative provision or off-site education, whether long term, temporarily or for part of the week, Jasmine Hall retains overall responsibility for safeguarding. Before placement, the school will obtain written assurance about the provider's safeguarding arrangements, safer recruitment and DBS checks, staff competence, premises, health and safety, online safety, attendance reporting, behaviour and restrictive intervention arrangements, and how safeguarding concerns and allegations will be managed. The placement will be individually risk assessed, suitable for the pupil's age, needs and SEND, and kept under regular review through direct contact with the pupil and the provider.

The school ensures that:

- alternative provision placements are appropriately vetted and commissioned
- safeguarding arrangements, policies and procedures of the provider are reviewed and assured before placement
- clear information-sharing arrangements are in place between the school, the provider, parents or carers and relevant agencies
- attendance, engagement, behaviour and welfare are monitored regularly
- any safeguarding concerns are reported immediately to the **Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL)** and managed in line with this policy
- pupils attending alternative provision remain included within the school's safeguarding monitoring and review processes.

Leaders maintain oversight of pupils placed in alternative provision and take prompt action where concerns arise to ensure pupils are kept safe and supported.

22. Work Experience

- When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place

- Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16

23. Private Fostering

- Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary check

24. Bullying

24.1 Jasmine Hall acknowledges and recognises that under the Children Act 1989 bullying incidents should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering or likely to suffer significant harm'. Where this is the case, the staff should report their concerns to the Headteacher. Even where safeguarding is not considered to be an issue, we may need to draw on a range of external services to support the child or young person who is experiencing bullying in or out of school or to tackle any underlying issue which has contributed to a child or young person engaging in bullying, (Dfe 'Preventing and Tackling Bullying', July 2017).

24.2 Bullying can have a profound impact on emotional and mental health. We have an Anti-Bullying policy setting out the respective rights and responsibilities of the young people and our staff in preventing and dealing with bullying.

24.3 Staff raise awareness of bullying through developing a culture in which respect and consideration for others is fundamental. We encourage young people to report bullying in the knowledge that it will be taken seriously whether the incident has taken in school or out of school.

24.4 Staff are trained in conflict management techniques to help them boost a young person's self-esteem and create a positive environment both of which we recognise as important factors in preventing young people from being bullied or becoming bullies.

24.5 School staff should apply intervention or disciplinary measures to children and young people to show clearly that their behaviour is wrong. Intervention or disciplinary measures should be applied fairly, consistently and reasonably taking into account any special educational needs or disabilities that the children or young people may have and taking into account the needs of vulnerable children and young people. It is important that the school considers the motivations behind the bullying and whether it reveals any concerns for the safety of the perpetrator.

Please also see Anti-Bullying Policy.

25. Online Safety

25.1 The growth of different electronic media in everyday life and an ever developing variety of devices including PC's, tablets, laptops, smart TV's, mobile phones, webcams etc. place an additional risk on our children. The school communicates with parents/carers to reinforce the importance of children being safe online.

25.2 Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and young people with a view to grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them. Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children and should be a concern to all those working with pupils at this school.

Pupils may experience or perpetrate online abuse through messaging, social media, gaming, livestreaming or image sharing. This includes cyberbullying, threats, harassment, AI-generated sexualised deepfakes, coercion, and the consensual or non-consensual making, sending or sharing of nude or semi-nude images and/or videos. Every incident involving nude or semi-nude images and/or videos requires a safeguarding response and must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).

25.3 The best protection is to make young people aware of the dangers through key worker sessions and curriculum teaching particularly PSHE and sex and relationship education. As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online

25.4 Jasmine Hall will ensure that suitable filtering and monitoring systems protect pupils from harmful, inappropriate and extremist content without unreasonably restricting teaching and learning. Filtering is provided through the school's firewall and Smoothwall monitoring. The senior leader responsible for filtering and monitoring will review the effectiveness of these systems at least once each academic year, with support from the Designated Safeguarding Lead (DSL) and IT support. Checks will cover all internet-connected devices and relevant locations, and a written record of checks, findings and actions will be retained.

Protection is Prevention

- Software is in place to minimise access and to highlight any one accessing inappropriate sites or information. The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils can be taught regarding online teaching.
- Pupils will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns the school's Designated Safeguarding Person should be informed immediately)
- Pupils should not give out their personal details, phone numbers, schools, home address, computer passwords etc.
- Pupils should adhere to the Jasmine Hall School Online Safety Policy

The police will be involved if there is any criminal element to misuse of the internet, phones or any other form of electronic media. The use of mobile phones by staff and pupils is closely monitored by the school, in accordance with the school policy.

25.5 Jasmine Hall will consider the age range of children, the number of Children, how often It systems are accessed and the costs versus the risks when deciding on the filters and monitoring systems that are needed to prevent assess to materials in line with their Prevent Duty.

25.6 As Schools increasingly work online it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.

25.7 Mobile Phone and Camera Safety

- Staff members will not use personal mobile phones or cameras when pupils are present
- Staff may use mobile phones on school premises outside of working hours when no pupils are present
- Staff may use mobile phones in the staffroom during breaks and non-contact time
- Mobile phones will be safely stored and in silent mode whilst pupils are present
- Staff will use their professional judgement in emergency situations
- Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present
- Mobile devices will not be used to take images or videos of pupils or staff in any circumstances
- The sending of inappropriate messages or images from mobile devices is strictly prohibited
- Staff who do not adhere to this policy will face disciplinary action
- The school will adhere to the terms of the Online Safety Policy at all times

25.7 Generative Artificial Intelligence (AI)

The school recognises that generative artificial intelligence (AI) can create safeguarding, privacy, misinformation, bias, academic integrity and harmful content risks. Staff and pupils will use approved AI systems only, must not enter personal or special category data unless there is an authorised lawful basis to do so, and will follow the school's Online Safety Policy and Acceptable Use Agreements. AI-generated material will be reviewed by a responsible member of staff before educational use. Any safeguarding concern involving AI, including sexualised deepfakes, manipulated images or other AI-generated harmful content, must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).

25.8 Photography, Videos and Mobile Devices

- Photographs and videos of pupils will be carefully planned before any activity, with particular regard to consent and the school's Data Protection Policy.
- Where photographs or videos involve looked after children (LAC), previously looked after children, adopted children, or pupils for whom there are security concerns, appropriate safeguarding arrangements will be determined before any photographs or videos are taken.
- In known cases involving a looked after or adopted child, the DSL will liaise with the pupil's social worker, carers or adoptive parents to assess the associated needs and risks.

- Staff will report any concerns about another member of staff's use of mobile phones or personal devices to the DSL, in accordance with the Child Protection and Safeguarding Policy and the Allegations of Abuse Against Staff Policy.

25.9 Remote Education Safeguarding

Where remote education is required, the school will apply the same safeguarding principles as on site, including suitable supervision, safe communication platforms, professional boundaries, attendance and pupils' welfare checks, online filtering and monitoring where applicable, and a clear route for pupils, parents, carers and staff to report concerns. Staff will follow the school's Online Safety Policy, Staff Code of Conduct and any current Department for Education guidance.

26. Sports Clubs and Extra Curricular Activities

Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils.

Sport, changing and supervision arrangements will be risk assessed with particular attention to staff-pupil boundaries, one-to-one coaching, transport, photography, overnight activity, medical needs and allegations. Staff will follow the school's code of conduct and national governing body safeguarding requirements.

Safeguarding requirements for premises

The proprietor and leaders will ensure school premises are safe, secure and suitable, including controlled access, visitor procedures, safe changing and toilet arrangements, supervision of shared or hired spaces, management of contractors, fire and emergency arrangements and prompt action on defects. Safeguarding will be considered when premises are used by external organisations, with written expectations and clear routes for reporting concerns.

Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to First Contact (Derby), Starting Point (Derbyshire) or the police, if necessary.

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

27. Risk Assessments

27.1 Jasmine Hall will ensure risk assessments are in place and regularly updated for children, these will be in the home, at school and for specific activities and visits. Jasmine Hall will maintain a risk register in respect of known safeguarding risks both site specific and child specific and the control measures in place to control these risks. The School uses the EVOLVE system, for off-site educational visits.

27.2 Jasmine Hall School staff will ensure we are doing everything possible to assess, control, and reduce the risks to acceptable levels. Thus promoting a safe, positive environment and promoting and protecting children from known and unnecessary risks

27.3 Jasmine Hall will ensure staff are regularly briefed and informed of changes to risk assessments to effectively manage the risks.

28. Recording and Reporting

Learning from Serious Case Reviews continues to identify the need for improved record keeping and information sharing, both within and between agencies.

All concerns, discussions and decisions made and the reasons made for these decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the DSL.

Jasmine Hall recognises that accurate and up-to-date record keeping is essential for a number of reasons:

- It helps to identify causes for concern at an early stage. Often it is only when a number of seemingly minor issues are taken as a whole that a safeguarding or child protection concern becomes clear.
- It helps to monitor and manage its safeguarding practices.
- It helps to evidence robust and effective safeguarding practice in inspections and audits.
- Accurate and specific records are important where there are child protection and safeguarding concerns e.g. a chronology of information gathered and action taken.
- Jasmine Hall has clear procedures for reporting and recording child protection concerns (please refer to the 'Child Protection Record keeping procedures' document). This should be read in conjunction with:
- Keeping Children Safe in Education 2026

Information sharing to safeguard children and young people (DfE statutory guidance, September 2026). This replaces the DfE's earlier non-statutory advice, Information sharing: advice for practitioners providing safeguarding services.
https://www.gov.uk/government/publications/information-sharing-to-safeguard-children-and-young-people

The procedures give clear guidance on:

- Recording reports
- Storing child protection (CP) files

- Who has access to CP files and information sharing
- Transferring CP Files
- Retention of CP files
- Auditing of CP file

Well-kept records are essential in situations where it is suspected or believed that a child may be at risk from harm.

Records should:

- state who was present, time, date and place
- use the child's words wherever possible
- be factual/state exactly what was said
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation
- be written in ink and signed by the recorder
- decisions to share or not share information with other organisations, with the reasons, and whether the child and family were told.

Records about child protection or pertaining to welfare concerns or issues, including CAF paperwork, will be retained securely and separately to the curriculum records of the child. A clear 'sign post' will indicate in a young person's main file that a confidential report is held in a separate Child Protection file. If the child moves to another school or college, the DSL will transfer the child protection file securely and separately from the main pupil file, as soon as possible and within five days for an in-year transfer, or within the first five days of the start of a new term. Confirmation of receipt will be obtained. Any necessary redaction must not remove information relevant to safeguarding the child or others.

SLEUTH System

At Jasmine Hall School, the safety and well-being of our pupils are of paramount importance. We are committed to ensuring that all safeguarding concerns are promptly identified, logged, and addressed in a systematic and secure manner. To enhance our safeguarding processes, we have implemented the use of an online programme called 'Sleuth' for logging safeguarding concerns.

Purpose

The purpose of this section is to outline the procedures for using Sleuth to log, monitor, and manage safeguarding concerns. This system ensures a consistent approach to safeguarding, enabling quick response and effective resolution of issues.

Procedures

1. **Logging Concerns**
    - **Identification:** All staff members are responsible for identifying safeguarding concerns. This includes any signs of abuse, neglect, exploitation or any other issue that may affect the safety and well-being of a pupil.
    - **Reporting:** Staff must report concerns immediately to the Designated Safeguarding Lead (DSL) or a Deputy Safeguarding Lead (DDSL) through the Sleuth system.
    - **Documentation:** The staff member reporting the concern must provide a detailed account of the issue, including dates, times, and any relevant information.
2. **Using Sleuth**
    - **Access:** Only authorised personnel will have access to the Sleuth system to ensure confidentiality and data protection.
    - **Entry:** The DSL or DDSL will review the logged concern on Sleuth, ensuring all relevant details are accurately recorded.
    - **Follow-up:** The DSL or DDSL will initiate appropriate follow-up actions, which may include further investigation, contacting external agencies, or providing support to the pupil and family.
3. **Monitoring and Review**
    - **Ongoing Monitoring:** The DSL will regularly monitor the Sleuth logs to ensure all concerns are being addressed and to identify any patterns or recurring issues.
    - **Review Meetings:** Regular safeguarding review meetings will be held to discuss logged concerns, the actions taken, and any additional support required.
    - **Updates:** The DSL will update the Sleuth logs with any new developments or resolutions to ensure a comprehensive record of each concern.

Confidentiality and Data Protection

- **Confidentiality:** All safeguarding concerns logged in Sleuth will be treated with the utmost confidentiality. Access to the system will be restricted to the DSL, DDSLs, and other authorised personnel.
- **Data Protection:** The use of Sleuth complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. All data entered into the system will be securely stored and only accessible to authorised personnel.

Training

- **Staff Training:** All staff members will receive training on identifying safeguarding concerns and using the Sleuth system. This training will be part of the regular safeguarding training program and updated as necessary.
- **Ongoing Support:** The DSL/ DDSL will provide ongoing support and guidance to staff on using Sleuth effectively and ensuring all safeguarding concerns are properly logged and managed.

Conclusion

The implementation of Sleuth as a tool for logging safeguarding concerns is a critical component of our safeguarding policy. It ensures that all concerns are documented,

monitored, and addressed in a timely and effective manner, thereby enhancing the safety and well-being of all pupils at Jasmine Hall School.

For further information or if you have any questions about using Sleuth, please contact the Designated Safeguarding Lead.

'Nagging Doubt' and Serious Concern Forms

These forms are completed by staff when there is a concern or 'nagging doubt' about any aspect of a child's general welfare. (Examples may include changes in a child's behaviour, a comment overheard in a conversation, initial concerns around attendance or changes in eating habits). This enables us to record all low-level concerns. The doubt may or may not be related to a Child Protection or Safeguarding issue. These forms **(Appendix 1a and 1b)** are completed by a member of staff and then returned to the DSL or Deputy DSL. The DSL/DSL will review the form to decide what action is to be taken i.e. to be managed internally or to take other action including making a referral to **First Contact Team** or the relevant Children's Services Team. If it is decided that the issue can be managed internally the DSL/Deputy DSL will pass the form to the Pastoral Team and a plan of action will be agreed.

Attendance at Child Protection Conferences

The Designated Safeguarding Lead or their deputy will be expected to attend the initial Child Protection Conference and Reviews, and provide a written report.

Parents should be informed of what is in the report as there should be no surprises about the information shared at Conference.

If a child is made subject to a Child Protection Plan it may be more relevant for the class teacher or head of year to attend the subsequent core group meetings and they will be given appropriate support around safeguarding issues by the Designated Safeguarding Lead.

If a child is made subject to a Child Protection Plan this will be clearly signposted in his/her main file but confidential records will not be kept in the main file, these will be securely stored separately.

29. Evaluation and Monitoring

29.1 Jasmine Hall will monitor and evaluate policies, practices and procedures in relation to safeguarding with the home and school on a regular basis to ensure it keeps current with the most modern guidance and legislation.

29.2 Jasmine Hall requires safeguarding as a regular item on the agenda of Senior Management Teams meetings and all staff meetings, therefore being at the forefront of senior managers thinking. In senior management meetings safeguarding training, the risk assessment and risk register should be reviewed and updated where necessary.

29.3 Jasmine Hall will undertake a Safeguarding Audit, annually, in the Summer Term by the Designated Safeguarding Lead. Jasmine Hall will respond and act within set time-lines to any recommendations.

Key documents referred to and underpinning this policy are:

Key documents referred to and underpinning this policy are:

- Keeping Children Safe in Education (DfE, 2026)
- Working Together to Safeguard Children (DfE, 2026)
- Working Together to Improve School Attendance (DfE, 2026)
- Derby and Derbyshire Safeguarding Children Partnership Procedures
- Meeting Digital and Technology Standards in Schools and Colleges (DfE, 2023)
- Education (Independent School Standards) Regulations 2014, as amended
- SEND Code of Practice: 0 to 25 Years (DfE and Department of Health, January 2015)
- Equality Act 2010
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education and Skills Act 2008
- Children and Families Act 2014
- School Attendance (Pupil Registration) (England) Regulations 2024, as amended
- Safeguarding Vulnerable Groups Act 2006, as amended
- Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Prevent Duty Guidance: England and Wales (Home Office, 2023)
- Channel Duty Guidance: Protecting People Susceptible to Radicalisation (Home Office, 2023)
- Preventing and Tackling Bullying (DfE, July 2017 – current version)
- Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (UK Council for Internet Safety – current edition)
- Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings (Safer Recruitment Consortium, current edition)

- Restrictive Interventions: Guidance on the Use of Reasonable Force in Schools (DfE, effective 1 April 2026)
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Voyeurism (Offences) Act 2019
- Crime and Policing Act 2026 (including changes to regulated activity and volunteer checks effective from 1 September 2026)
- The Right to Choose: Government Guidance on Forced Marriage (Home Office, current edition)
- Children Act 2004, section 16LA (Duty to share information), inserted by section 4 of the Children's Wellbeing and Schools Act 2026. In force from 30 September 2026.

Information sharing to safeguard children and young people (DfE statutory guidance, September 2026). This replaces the DfE's earlier non-statutory advice, Information sharing: advice for practitioners providing safeguarding services.
https://www.gov.uk/government/publications/information-sharing-to-safeguard-children-and-young-people

Appendix 1a 'Nagging Doubt'

CONFIDENTIAL

Not to be kept with curriculum records

'Nagging Doubt'

(to be passed to Designated Safeguarding Person or Deputy Designated Safeguarding Person)

Name of Child_____
Class_____

Date of 'Nagging Doubt' _____
Time_____

Nature of concern or 'Nagging Doubt'

(log here the 'nagging doubt' that you have about a C&YP that MAY or MAY NOT indicate a Safeguarding/Child Protection issue)

Member of Staff raising concern	

Action by Jasmine Hall

Appendix 1b 'Serious Concern Record'

STRICTLY CONFIDENTIAL: Record of a Serious Concern

Name(s): (Child/Young Person(s) I am concerned about, DOB	
Why I am concerned- outline the nature of your concern and any potential risk factors e.g. are you worried about the child's health or development, home conditions, the possibility of abuse or neglect, concerned about parents and parenting, possible vulnerability or risk to Radicalisation and Extremism	
What prompted my concern- *who, what, where and when?* Have you been worried about them before? Has something significant changed or happened today?	
Signed	
Name and Role	
Time/Date	

Appendix 2: Chronology and Record of Events Form

CONFIDENTIAL: Chronology and Record of Events

Name of Child/Family: ……

Reasons for starting this chronology:
……
……
……
……

Signed: Date:

Date	Event/Information	Action Taken (if any)	Signed

Appendix 3: Signs of Abuse

Physical Signs	Changes in Behaviour
Physical Abuse	
• unexplained bruising, marks or injuries on any part of the body • multiple bruises- in clusters, often on the upper arm, outside of the thigh • cigarette burns • human bite marks • broken bones • scalds, with upward splash marks, • multiple burns with a clearly demarcated edge	• fear of parents being approached for an explanation • aggressive behaviour or severe temper outbursts • flinching when approached or touched • reluctance to get changed, for example in hot weather • depression • withdrawn behaviour • running away from home
Emotional	
• Speech disorders • Delayed physical development • Substance abuse • Ulcers, severe allergies • Failure to thrive • Self-harm	• neurotic behaviour e.g. sulking, hair twisting, rocking • being unable to play • fear of making mistakes • sudden speech disorders • self-harm • fear of parent being approached regarding their behaviour • developmental delay in terms of emotional progress
Sexual	
• pain or itching in the genital area • bruising or bleeding near genital area • sexually transmitted disease • vaginal discharge or infection • stomach pains • discomfort when walking or sitting down • pregnancy	• sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn • fear of being left with a specific person or group of people • having nightmares • running away from home • sexual knowledge which is beyond their age, or developmental level • sexual drawings or language • bedwetting • eating problems such as overeating or anorexia • self-harm or mutilation, sometimes leading to suicide attempts • saying they have secrets they cannot tell anyone about • substance or drug abuse

	• suddenly having unexplained sources of money • not allowed to have friends (particularly in adolescence) • acting in a sexually explicit way towards adults
Neglect	
• constant hunger, sometimes stealing food from other children • constantly dirty or 'smelly' • loss of weight, or being constantly underweight • inappropriate clothing for the conditions	• complaining of being tired all the time • not requesting medical assistance and/or failing to attend appointments • having few friends • mentioning being left alone or unsupervised
Exploitation	
• constantly on their phone, secretive about who they are contacting • unexplained gifts, clothing • Isolated from peers, social networks • Unexplained injuries • Recent or sudden changes in behaviour • Fear of others, places • High level of alert, seem on the edge	• Comments about new friends, groups • Secretive about gifts, money • Becoming withdrawn, isolated • Behaviour changes, sever mood swings

Appendix 4: Do's and Don'ts of Managing a Disclosure

Do's and Don'ts of Managing a Disclosure

Do's	Don'ts
• Stay calm and control expressions of panic and shock • State clearly that the abuse was not the child/young person's – no matter what the circumstances • Always accept what the child says, no matter how fanciful it may appear to you — let them know you believe them • Allow the child/young person to talk at their own pace, and use their own language • Listen attentively and only ask open-ended questions • Encourage the child/young person to talk about their concerns, as this can be helpful in dealing with difficult experiences • Tell the child/young person you are pleased they told you • At some point in the disclosure ensure that you inform the child or young person that you cannot offer absolute confidentiality or protection • Take careful notes throughout, if appropriate, or very soon after the child/young person has left • Keep to the facts, and use the words as they were spoken to you	• Avoid using leading questions • Do not pressure the child/young person into telling you more than they want to. • Avoid going over the information time and time again; you are only gathering information • Do NOT try to determine for yourself if the allegation is valid or invalid • Do NOT use shocked or disbelieving body language while the child is talking. The child may interpret this to mean that you find the CHILD unacceptable versus the ACT perpetrated on the child • Do NOT gossip about the allegations to friends, relatives, or advocates • Do NOT ever try to talk a child out of what he/she is saying. If you are sceptical, do NOT express your doubts to the child. This is a task for investigators to sort through, and you can express your doubts to them • Do NOT stand over the child while he/she is talking about the abuse. This may make the child feel crowded or dominated • Don't deny, explain away, defend the abuser or justify the abuse. This discounts the victim • Don't try to find inconsistencies or question the child's motive to tell • Don't ask why. "Why did you go when he call?" "Why didn't you tell sooner?" "Why didn't you just do what she told you to do?" This blames the victim • Don't tell the child you wish s/he had not told you or that you are frightened or confused about what to do ... even when you are. Do not show revulsion or shock • Don't demand details. Don't pry. This violates the child's trust in you and it is the job of the investigators • Don't suggest things that the child could/should have done. "You should have run away." "You could

	have called out." This blames the victim. It is not the time to work on prevention • Don't wait a week or so until it is mentioned again to say or do something. Don't let it drop and don't ignore your feelings

Appendix 5 – National Contacts

NSPCC

- NSPCC Helpline: 0808 800 5000
- Stop It Now! Helpline (Lucy Faithfull Foundation): 0808 1000 900

National Contacts

- Police (non-emergency): 101
- Emergency: 999
- CEOP (Child Exploitation and Online Protection): https://www.ceop.police.uk
- Professionals Online Safety Helpline: 0344 381 4772
- Safer Internet Centre: helpline@saferinternet.org.uk
- Internet Watch Foundation (IWF): https://www.iwf.org.uk
- Childline: 0800 1111
- Ofsted General Enquiries: 0300 123 1231
    - Email: enquiries@ofsted.gov.uk
- Educate Against Hate (HM Government): https://www.educateagainsthate.com

Modern Slavery and Human Trafficking

Follow the National Referral Mechanism (NRM) guidance and contact the police on 101, or 999 in an emergency. The Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) should seek advice from children's social care and the Modern Slavery and Exploitation Helpline on 08000 121 700, where appropriate.

Immigration

For immigration and visa information, refer to UK Visas and Immigration (UKVI) via GOV.UK.

Appendix 6- Local information sharing arrangements

Our local safeguarding partnership is Derby and Derbyshire Safeguarding Children Partnership. For Derby City, contact First Contact on 01332 641172 or Derby Careline on 01332 956606 out of hours. For Derbyshire, contact Starting Point on 01629 533190. In an emergency, call 999.

The partnership's policies and procedures are at https://www.ddscp.org.uk/staff-and-volunteers/policies-and-procedures/. Where these differ from the Information Sharing Duty, the duty and our policy take priority. We will update this appendix when the partnership publishes its revised arrangements and data sharing agreement for the duty.

For a child who lives in another local authority, we share with that authority's front door and follow its arrangements.