

Safeguarding and Child Protection Policy – Petite Ecole de Reigate

Key contacts at Petite école de Reigate

	Name and email address	Telephone
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Deputy Designated Safeguarding Lead (DDSL)	Maha Haskir admin@petite-ecole-reigate.co.uk	07913 811 345

Key external contacts

	Email address	Telephone
Local Authority Designated Officer(s) - (LADO) https://surreyscp.org.uk/professionals/dealing-with-allegations-against-people-working-with-children/ (incl. LADO referral form)	LADO@surreycc.gov.uk	0300 123 1650 (option 3)
Surrey Children Services C-SPA	cspa@surreycc.gov.uk	0300 470 9100
Surrey Police in case of concern for the child's immediate safety		999
Partnership		
UK Safer Internet Centre	helpline@saferinternet.org.uk	0344 381 4772
NSPCC whistleblowing helpline 42 Curtain Road London EC2A 3NH https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/	help@nspcc.org.uk	0800 028 0285
Report Abuse in Education helpline A dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse.	help@nspcc.org.uk	0800 136 663

Policy Contents

Safeguarding and Child Protection Policy – Petite Ecole de Reigate	1
Key contacts at Petite école de Reigate.....	1
Key external contacts	1
1. Aims.....	5
2. Scope and application	5
Who and When This Policy Covers	5
2.1 Statutory guidance:	6
2.2 Non-statutory advice:	6
3. Publication and availability	7
4. Definitions.....	7
5. Responsibility statement and allocation of tasks: our school’s approach to safeguarding leadership.....	7
Proprietor's Role:	7
Head's Role:	8
Designated Safeguarding Lead's (DSL) Role:	8
6. Reporting obligations of staff.....	8
7. Making a referral.....	8
8. Extra-familial harm	9
9. Risk assessment	9
10. Key school Staff duties.....	10
10.1 School Staff behaviour:.....	10
10.2 Duty to report:	10
10.3 Duty to self-refer:.....	10
10.4 A culture of sharing:.....	10
11. Allegations against pupils: child-on-child abuse	10
12. Allegations against adults and low-level concerns	10
12.1 Reporting all concerns:	10
12.2 Low level concerns:	10
12.3 Concerns that meet the harm threshold:	11
12.4 Definition of Harm:	11
12.5. How to raise concerns and allegations:	11
12.6. Our School's response to concerns and allegations:	12

12.7. Disclosure of information about concerns and allegations:	13
12.8. Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency.	14
12.9. Record keeping.....	15
12.10. References	15
12.11. Questions.....	16
12.12. Informing our school parents	16
13. Safer recruitment and supervision of staff	16
14. Training	16
14.1 Induction.....	17
14.2 Designated Safeguarding Lead (DSL)	17
15. Arrangements for use of school premises for non-school activities.....	17
16. Monitoring and review	18
17. Record keeping.....	18
Appendices	20
Appendix 1: Forms of abuse and neglect and specific safeguarding risks	20
1. Abuse and neglect	20
2. Definitions of abuse and neglect	20
2.1 Abuse:	20
2.2 Physical abuse:	20
2.3 Emotional abuse:	20
2.4 Sexual abuse:.....	21
2.5 Neglect:	21
3. Specific safeguarding issues	21
4. Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)	22
5. County lines	23
6. Female genital mutilation (FGM)	23
7. Forced marriage	24
8. Radicalisation and the Prevent duty	24
9. Child-on-child abuse	25
10. Upskirting.....	25
11. Children who are lesbian, gay, bi, or trans (LGBT)	26
Appendix 2: Concerns about a child - guidance for our FLAM school staff	27
1. Receiving a disclosure	27

2. Recording a concern.....	28
3. Use of reasonable force.....	28
Appendix 3: Good practice	29
Appendix 4: Safeguarding incident/Concern form	30
Appendix 5: Lead and Deputy Safeguarding Role Description	32

1. Aims

This is the Safeguarding and child protection policy and procedures of Petite école de Reigate school. The aims of this policy are as follows:

- to promote the well-being of pupils.
- to safeguard and promote the welfare of children, staff and others.
- to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and / or allegations of abuse, neglect and / or exploitation.
- to raise awareness about how to report concerns and how they will be investigated.
- to raise staff awareness about the school's safeguarding expectations.
- to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role.
- to ensure consistent good safeguarding practice throughout the school Petite école de Reigate
- to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond and to promote a whole school culture of safety, equity and protection.

Every pupil in our school should feel safe and protected from any form of abuse and neglect.

All our school staff should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children.

This policy forms part of Petite école de Reigate whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the school to ensure that the best interests of pupils are aligned with our values (*see the Statement of Aims*).

2. Scope and application

Who and When This Policy Covers

- **Everyone at our school:** This policy applies to all staff, volunteers, students (including those in Early Years Foundation Stage), and activities at our school.
- **Always in effect:** This policy is important all the time, even when:
 - Students or staff are away on school trips or events
 - School is closed for breaks or holidays
- **Official and unofficial activities:** This policy covers events organised by the school and any other activities happening on school grounds or associated with our school.
- **Our commitment:** This policy is how we fulfil our responsibility to protect and support the well-being of every child in our school's care.

This policy has been prepared to meet our school's responsibilities under the following legislation:

- Education (Independent School Standards) Regulations 2014; *Statutory framework for the Early Years Foundation Stage* (DfE, September 2023).
- Education and Skills Act 2008.

- Children Act 1989.
- Children Act 2004.
- Childcare Act 2006.
- Safeguarding Vulnerable Groups Act 2006.
- Children and Social Work Act 2017.
- Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**).
- Equality Act 2010
- Human Rights Act 1998.
- Domestic Abuse Act 2021

This policy has regard to the following guidance and advice:

2.1 Statutory guidance:

- Keeping children safe in education **KCSIE** (DfE, September 2023): <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working together to safeguard children 2018 **WTSC** (HM Government, updated July 2022) (WTSC): <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Disqualification under the Childcare Act 2006 (DfE, August 2018);
- Revised Prevent duty guidance for England and Wales (HM Government, April 2021);
- Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020);
- Children missing education (DfE, September 2016);
- Relationships education, relationships and sex education and health education guidance (DfE, September 2021);
- Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, February 2021);
- PACE Code C 2019.

2.2 Non-statutory advice:

- What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015);
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018);
- Behaviour in schools: advice for headteachers and school staff (DfE, September 2022);
- Working together to improve school attendance (DfE, September 2022);
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, December 2020)
- Searching, screening and confiscation: advice for schools (DfE, September 2022);
- Teaching online safety in schools (DfE, June 2019);
- Harmful online challenges and online hoaxes (DfE, February 2021);
- Digital and technology standards in schools and colleges (DfE, March 2023)
- Keeping children safe in out-of-school settings: code of practice (DfE, April 2022)

- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017);
- Virginty testing and hymenoplasty: multi-agency guidance (DHSC, July 2022);
- Safeguarding children and protecting professionals in early years settings: online safety considerations (UK Council for Internet Safety, February 2019);
- Educate Against Hate (HM Government 2018); and
- Equality Act 2010: advice for schools (DfE, June 2018).

3. Publication and availability

This policy is published on the school's website. This policy is available in hard copy on request.

4. Definitions

- **Proprietor:** Petite école de Reigate. The Management Committee makes decisions for Petite école de Reigate.
- **Working days:** For this policy, "working days" are Monday to Friday. This applies even if the school is open only on Saturdays. Check our website for specific term dates.
- **Safeguarding:** Protecting people from harm.
- **Safeguarding and promoting the welfare of children:** This means:
 - Protecting children from abuse and neglect.
 - Preventing harm to children's mental and physical health or development.
 - Ensuring children grow up in safe and supportive environments.
 - Taking action to help all children have the best possible lives.
- **DSL:** Designated Safeguarding Lead.
- **DDSL:** Deputy DSL (DDSL).
- **Designated Officer (DO):** A person at the local authority (often called the LADO) in charge of managing allegations and working with safeguarding partners.
- **Staff:** Everyone working in our school, including employees, contractors, supply staff, volunteers, Proprietors, unless stated otherwise.

5. Responsibility statement and allocation of tasks: our school's approach to safeguarding leadership

The Proprietor, Headteacher and DSL are dedicated to safeguarding children in our school. While our operating hours differ from traditional schools, we recognize the unique challenges supplementary settings may pose. This policy outlines the specific steps we take to adapt safeguarding principles to our school.

Everyone in our school works together to protect children. Here's how our leadership team ensures we meet this responsibility:

Proprietor's Role

- Ultimate responsibility for safeguarding, following government guidelines.
- Oversees the school's safeguarding approach.

- Appoints a Designated Safeguarding Lead.
- Review and approve the school's Safeguarding Policy at defined frequency to ensure continuous validity.
- Supports the Head and DSL in creating a strong safeguarding culture.

Head's Role

- Manages our school and handles concerns about staff.
- Ensures all staff understand and follow safeguarding policies.

Designated Safeguarding Lead's (DSL) and Deputy Designated Safeguarding Lead's (DDSL) Role

- Leader in charge of all aspects of safeguarding.
- Has necessary authority, training, and support to fulfil the role effectively.
- Advises staff, attends meetings, assesses children's needs, and works with outside agencies.
- Responsible for online safety and mental wellbeing of pupils and staff.
- Works with the Head to manage police involvement and requirements.
- Deputy DSLs provide support for the DSL when unavailable.

6. Reporting obligations of staff

- **Be Vigilant:** All staff must be aware that abuse or neglect can happen in any setting. If you have any concern about a child's well-being, act in their best interests.
- **Understanding Barriers:** Children may not disclose abuse or recognize it as harmful due to fear, embarrassment, disability, or other factors.
- **Reporting Obligations:** Staff must report:
 - Concerns about a child's safety.
 - Concerns about the safety of others associated with the school.
 - Safeguarding concerns about any staff or school associate.
- Follow-up to ensure concerns are addressed.
- **Reporting Procedure:** Report concerns immediately to the DSL or Deputy DSL.

7. Making a referral

- **DSL Assessment:** Upon receiving a concern, the DSL follows Local Safeguarding Partner guidelines to determine the best course of action, which may include:
 - Internal school support with advice from Children's Social Care (if needed).
 - Early help assessment (generally requires parental consent).
 - Referral to statutory services.
- **Child's Perspective:** The child's views will be considered but are not the sole deciding factor.
- **Ongoing Review:** If a referral is not deemed necessary, the DSL will continue monitoring the situation and reconsider a referral if needed.
- **Urgent Action:** If a child is at immediate risk of harm, contact Children's Social Care (CSC) and the police without delay.

- Defining Harm: Harm includes physical or emotional abuse, neglect, or witnessing harm to others. Significance is assessed against the expected development of a similar child.
- Referral Contact: Your school's CSC contact details are within this policy. Referrals are made to the local authority of the child's residence.
- Open Communication: Anyone (staff, children, family, public) can contact CSC to discuss concerns before a formal referral. Local Safeguarding Partners have guidance on when to contact CSC.

8. Extra-familial harm

Safeguarding incidents and/or behaviours can be associated with factors outside our school and/or can occur between children outside the school, inside and outside of home and online.

All school staff, including the DSL, should consider the context within which such incidents and/or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare and should record these appropriately.

Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

Extra-familial harm: all staff, but especially the DSL (and DDSL) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

9. Risk assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of risk assessment may vary and may be included as part of the school's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the school's approach to promoting pupil welfare will be systematic and pupil focused.

The Headteacher has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

Day-to-day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in and tasked with carrying out the assessment.

10. Key school Staff duties

10.1 School Staff behaviour:

All our school staff must comply with the Petite école de Reigate Staff Code of Conduct which sets out appropriate and expected standards of behaviour.

10.2 Duty to report:

As a member of our school staff, you must immediately follow this policy to report **any** concerns you have about the conduct of a pupil, a member of staff or any other adult. This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, pupil, parent or another adult, or as a result of checks or information brought to your attention.

10.3 Duty to self-refer:

You must refer yourself to the Headteacher or DSL where you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

10.4 A culture of sharing:

All our school staff have a positive obligation to support the school's culture of openness and sharing without fear of reprisal.

11. Allegations against pupils: child-on-child abuse

Allegations against pupils should be reported using the relevant safeguarding report form. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

12. Allegations against adults and low-level concerns

12.1 Reporting all concerns:

All concerns must be raised whether they are considered to be "low-level" concerns or conduct which may meet the harm threshold. You can see Appendix 2 on how to record a concern.

12.2 Low level concerns:

A low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of staff may have acted in a way that is inconsistent with expected professional standards and/or the staff Code of Conduct, whether inside or outside work. No concern is too small or minor to raise under this policy.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone/other device.
- engaging with a child on a 1:1 basis in a secluded area behind a closed door.
- using inappropriate sexualised, intimidating, or offensive language, email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols.
- Any incident where a member of staff feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.

12.3 Concerns that meet the harm threshold:

Allegations that may meet the harm threshold is those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual 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 he or she would pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the school which creates a transferable risk.

12.4 Definition of Harm:

It is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse (see Appendix 1). There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:

- the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning".
- the Children Act 1989 defines:
 - (a) "harm" as "ill-treatment or the impairment of health or development including, for example, impairment suffered from seeing or hearing the ill treatment of another";
 - (b) "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";
 - (c) "health" as "physical or mental health".

12.5. How to raise concerns and allegations:

12.5.1 Raising low-level concerns:

Where you have a low-level concern in respect of any member of our school staff, you must report the matter immediately. You can raise this with the Head or DSL by sending an email or by speaking to them directly.

12.5.2 Duty of the DSL to refer concerns to the Headteacher:

The Headteacher remains the ultimate decision-maker in respect of all low-level concerns. Save for in cases involving the Headteacher, the DSL must promptly report any concern raised with them to the Head. Wherever possible the DSL must speak to the Headteacher in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Headteacher in person about the concern, the DSL must email the Headteacher with a summary of the concern on the same day the concern is raised.

12.5.3 Concerns about Staff that meet the harm threshold:

Where you have a concern about the conduct of a member of Staff (other than the Headteacher) that may meet the harm threshold (see point 12.3 above), you must raise this immediately with the Headteacher. Wherever possible you must speak to the Headteacher in person about the concern as soon as possible and always on the same day. You may then be asked to provide a written report. If it is not possible to speak to the Headteacher in person about the concern, you must email the Headteacher with a summary of the concern on the same day.

12.5.4 Concerns involving the Headteacher and conflicts of interest:

Due to the family connection between the Headteacher and Proprietor, where you identify a concern about the Headteacher, you must report the matter immediately to the Local Authority Designated Officer (LADO), without first notifying the Headteacher or Proprietor. Contact details of the LADO can be found at the front of this policy.

12.5.5 Concerns involving the Designated Safeguarding Lead:

Where you identify a concern about the DSL, you must report the matter to the Proprietor.

12.5.6 Concerns involving Proprietors or Board members:

Where you identify a concern about a Proprietor, you must report the matter immediately to the LADO.

12.5.7 Concerns involving organisations or individuals using school premises (including after-school club providers):

Where you identify a concern about an organisation or individual using school premises, you must report the matter immediately to the DSL.

12.6. Our School's response to concerns and allegations:

12.6.1 Appropriate action:

Our School will ensure that appropriate action is taken to address concerns that are raised under this policy.

12.6.2 Assessing concerns:

The Headteacher (or, if the concern relates to the Headteacher/Proprietor, the Proprietor/LADO) will determine whether the concerns raised are low-level or potentially meet the harm threshold. The DSL, the Headteacher, the Proprietor have all been trained to assess concerns and to record and address them appropriately.

12.6.3 Low-level concerns:

If our school determines the concern is a low-level concern, then the school will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the school's capability or disciplinary procedures.

12.6.4 Borderline cases:

The Headteacher (or, if the concern relates to the Headteacher/Proprietor, the Proprietor/LADO) may take advice from the LADO in borderline cases in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

12.6.5 Referral:

Where the Headteacher (or, if the concern relates to the Headteacher/Proprietor, the Proprietor/LADO) considers the concerns raised potentially meet the harm threshold, the Headteacher (or, if the concern relates to the Headteacher/Proprietor, the Proprietor/LADO) will make a report to the LADO before further action is taken. The Headteacher (or, if the concern relates to the Headteacher/Proprietor, the Proprietor/LADO) may also seek advice from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy. Contact details for the LADO are at the start of the document.

12.6.6 Responding to an allegation that may meet the harm threshold:

Where an allegation is made that may meet the harm threshold, the school will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The school will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so, and will keep the LADO informed of the action it is taking.

12.7. Disclosure of information about concerns and allegations:

12.7.1 Informing the individual of a low-level concern:

Our school will in most cases inform the individual concerned about any low-level concern that is raised about them.

12.7.2 Informing the individual of an allegation where appropriate:

The DSL will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

12.7.3 Communication and support for the individual subject to an allegation:

If and when it is appropriate to inform the individual of the allegation against them, the DSL will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

12.7.4 Informing the child's parents / carers where appropriate:

The DSL will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The DSL will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

12.7.5 Reporting restrictions:

Our school is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

12.7.6 Involvement of external agencies:

Where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the DSL will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

12.7.7 Concerns about supply staff and contractors:

Where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. The DSL will consult with the LADO before sharing any information with the individual's employer.

12.7.8 Concerns about organisations or individuals using school premises:

Where a concern / allegation has been made in respect to an organisation or individual using school premises for the purposes of running activities for children and/or vulnerable adults, the school will follow these procedures including informing the LADO.

12.8. Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency

12.8.1 Report to the DBS:

Our School is under a legal duty to make a referral to the DBS where a member of Staff is removed by our School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child. The DBS will then consider whether to impose sanctions which may restrict or prevent that person from working with children in future.

12.8.2 Report to the Teaching Regulation Agency:

If a teacher is dismissed because they are found to have committed serious misconduct, or their conduct has breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will also make a referral to the Teaching Regulation Agency. The Teaching Regulation Agency will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

12.9. Record keeping

12.9.1 Records of low-level concerns:

Low-level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition, all low-level concerns, including those that have not been addressed formally under the School's procedures, will also be stored securely in a central file (Concerns and Allegations Record).

12.9.2 Recording low level concerns:

The Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the School will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances.

12.9.3 Records of allegations that may meet the harm threshold:

Details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken in response to the allegation.

12.9.4 Storage and security of Concerns and Allegations Record:

The Concerns and Allegations Record will be stored electronically by the Headteacher and will be accessible by the Headteacher and the Management Committee only.

12.9.5 Malicious or false low-level concerns and allegations:

Details of low level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.

12.9.6 Retention of records:

In line with our school's information and records retention policy, all records should be retained until the accused has reached pension age, or a period of 10 years from the date of allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

12.10. References

12.10.1 Low-level concerns:

Low-level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the school's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

12.10.2 Allegations that meet the harm threshold:

Allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The school will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

12.11. Questions

Please contact the Headteacher or DSL if you have any questions about this policy.

12.12. Informing our school parents

Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Headteacher, the Designated Officer(s), children's social care, the police and / or the pupil before discussing details with parents.

In all cases, the DSL will be guided by the Safeguarding Children Partnership referral threshold document.

13. Safer recruitment and supervision of staff

Our School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's separate Safer Recruitment Policy.

Our School maintains a single central register of appointments for all staff.

Staff connected to the school's early years and later years provisions are under an ongoing duty to inform our school if their circumstances changed which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Safer Recruitment Policy for further information about this duty and to their contract of employment in respect of their ongoing duty to update the school.

Our School ensure that visiting speakers are suitable and appropriately supervised while in school.

14. Training

The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

The level and frequency of training depends on the role of the individual member of staff.

The School maintains written records of all staff training.

All training will be carried out in accordance with Local Safeguarding Children Partnership procedures where possible.

14.1 Induction

All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

- (a) this policy;
- (b) the role, identity and contact details of the DSL and their Deputies;
- (c) the Code of Conduct for pupils;
- (d) the Anti-Bullying Policy;
- (e) the Staff Code of Conduct including social media, reporting low level concerns and staff/pupil relationships;
- (f) safeguarding training in accordance with local Safeguarding Children Partnership's procedures including guidance on managing a report of child-on-child harmful sexual behaviour.

14.2 Designated Safeguarding Lead (DSL)

The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and will be updated at least every two years.

15. Arrangements for use of school premises for non-school activities

Where services or activities are provided under the direct supervision or management of the School, this policy will apply in relation to any safeguarding concerns / allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurances that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

Our School has in place arrangements for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

Our School will ensure that safeguarding requirements are included in any arrangement for the use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements providers have in place the School will have regard to the DfE's non-statutory guidance Keeping children safe in out-of-school settings.

16. Monitoring and review

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Head of Compliance and Health & Safety as necessary and seeking contributions from staff. The DSL will update the Senior Leadership Team regularly on the operation of the School's safeguarding arrangements.

Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Headteacher, who will report to the Board. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.

This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

The DSL will work with the Headteacher to prepare an annual written report commissioned by the Proprietor. The written report should address how the school ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled, including lessons learned; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Proprietor should also consider independent corroboration, such as:

- inspection of records or feedback from external agencies including the Designated Officer(s);
- reports of inspections;
- the outcome of any relevant complaints, claims or related proceedings;
- and press reports.

The Proprietor will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Proprietor will be made.

17. Record keeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school. Information should be kept confidential and stored securely in separate pupil profiles. These should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

The information created in connection with this policy may contain personal data. The school's use of this personal data will be in accordance with data protection law. The school has published on its website privacy notices which explain how the school will use personal data.

Safeguarding and Child Protection Policy – Petite école de Reigate

All records created in accordance with this policy are managed in accordance with the school’s policies that apply to the retention and destruction of records.

So far as pupil records are concerned:

- Staff must record all concerns about a pupil. Guidance on record keeping is set out in Appendix 2.
- The DSL will create a record following a report to them of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

Date: 28/07/2025

Date to be reviewed: July 2026

Signature:



Member to contact for more information: Lucile Mongiatti

	Review dates			
	2024	2026	2027	2028
Date reviewed	16/08/2024	28/07/2025		
Date approved by Management Committee	28/01/2025	24/02/2026		

Appendices

Appendix 1: Forms of abuse and neglect and specific safeguarding risks

1. Abuse and neglect

1.1 Our FLAM school Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

1.2 Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

2. Definitions of abuse and neglect

2.1 Abuse:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in

an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

2.2 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.

2.3 Emotional abuse:

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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.

2.4 Sexual abuse:

It involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of

clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

2.5 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.

3. Specific safeguarding issues

3.1 Statutory guidance acknowledges the following as specific safeguarding issues:

3.1.1 child abduction and community safety incidents;

3.1.2 children and the court system;

3.1.3 children being absent, repeatedly and/or for prolonged periods, children missing from education;

3.1.4 children with family members in prison;

3.1.5 child criminal exploitation and child sexual exploitation (see section 4 below);

3.1.6 county lines (see section 5 below);

3.1.7 modern slavery and the national referral mechanism;

3.1.8 cybercrime;

3.1.9 domestic abuse;

3.1.10 homelessness;

3.1.11 so-called "honour-based" abuse (including Female Genital Mutilation and Forced marriage) (see sections 6 and 7 below);

3.1.12 preventing radicalisation (see section 8 below);

3.1.13 child-on-child abuse (see section 9 below);

3.1.14 sexual violence and sexual harassment between children in schools and colleges;

3.1.15 upskirting (see section 10 below).

4. Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)

4.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

4.1.1 in exchange for something the victim needs or wants e.g. money, gifts or affection; and / or

4.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and / or

4.1.3 through violence or threat of violence to victims (and their families).

4.2 Children can be exploited by individual adults or groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

4.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

4.4 The victim may have been exploited even if the activity appears consensual.

4.5 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

4.6 Some of the following can be indicators of both CSE and CCE, including children who:

4.6.1 appear with unexplained gifts, money or new possessions;

4.6.2 associate with other young people involved in exploitation;

4.6.3 suffer from changes in emotional well-being;

4.6.4 misuse drugs and alcohol;

4.6.5 go missing for periods of time or regularly come home late; or

4.6.6 regularly miss school or education or do not take part in education.

4.7 Children who have been exploited will need additional support to help maintain them in education.

4.8 CSE 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.

4.9 The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others

copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:

4.9.1 have older boyfriends or girlfriends; or

4.9.2 suffer from sexually transmitted infections or become pregnant.

5. County lines

5.1 County lines 4 is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

5.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

5.3 Number of the indicators for CSE and CCE as detailed above may also be applicable to children involved in county lines.

5.4 Additional reporting duties:

5.4.1 if a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation;

5.4.2 where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism 5 should be considered.

6. Female genital mutilation (FGM)

6.1 FGM is a form of so-called "honour-based" abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

6.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the Multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 61-63 focus on the role of schools).

6.3 All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

6.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (January 2020) for further details about the duty.

6.5 Guidance published by the Department for Health also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

7. Forced marriage

7.1 Forced marriage is also a form of so-called "honour-based" abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

7.2 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the Multi-agency guidelines: handling case of forced marriage (HM Government, June 2014).

7.3 Staff should speak to the DSL if they have any concerns. Pages 32-36 of the Multi-agency guidelines: handling case of forced marriage (HM Government, June 2014) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fm@fco.gov.uk for advice and information.

8. Radicalisation and the Prevent duty

8.1 Our FLAM School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

8.2 Our FLAM School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Our FLAM School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

8.3 Our FLAM School has adopted the government's definitions for the purposes of compliance with the Prevent duty:

- **Extremism:** "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas".
- **Radicalisation:** "the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."
- **Terrorism:** "an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause."

8.4 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to extremist ideology and radicalisation and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, February 2021) The DfE and Home Office's briefing note The use of social media for online radicalisation (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

9. Child-on-child abuse

9.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or online.

10. Upskirting

10.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

10.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

10.3 Our FLAM School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

10.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

11. Children who are lesbian, gay, bi, or trans (LGBT)

11.1 The School recognises that pupils who are or perceived to be LGBT are vulnerable to being targeted by other children.

11.2 LGBT inclusion is taught as part of the statutory RSE and PSHE curriculum.

11.3 All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

Appendix 2: Concerns about a child - guidance for our FLAM school staff

1. Receiving a disclosure

It is important not to make promises that you may not be able to keep. Do not say that you will keep confidential what a child/young person is about to tell you, as you may have a duty to share it with others.

Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others.

Stay calm and listen carefully to what the child/young person is saying. Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

Allow the child/young person to continue at their own pace. Take the pupil to the School's 1st aider if there is a medical need and do not examine the injury yourself.

Ask questions for clarification only and at all times do not ask leading questions, i.e. a question which suggests its own answer. Use TED questioning: "tell me, explain to me, describe to me". It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and your questioning might compromise possible criminal proceedings.

Reassure the child/young person that they have done the right thing in telling you. Reassure the pupil they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.

Tell them what you will do next and with whom the information will be shared. Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken. It is important not to make promises that you may not be able to keep.

As soon as possible, record in writing what was said, using the child's/young person's own words. Make a note of the date, time, any names mentioned and to whom the information was given, and ensure that the record is signed and dated. All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

Helpful statements to make

- 'I believe you (showing acceptance of what the child/young person says).'
- 'Thank you for telling me.'
- 'It's not your fault.'

- 'I will help you.'

Do not say

- 'Why didn't you tell anyone before?'
- 'I can't believe it!'
- 'Are you sure that this is true?'
- 'Why? Who? When? Where?'

Never make promises you can't keep.

2. Recording a concern

2.1 Staff must record all concerns in Child Protection Monitoring File.

2.2 Records should be made as soon as possible (ideally within one hour of being told), they should be factual and should include:

2.2.1 the pupil's details: name; date of birth; address and family details;

2.2.2 date and time of the event / concern / conversation;

2.2.3 a clear and comprehensive summary of the event/concern / conversation;

2.2.4 details of how the concern was followed up and resolved,

2.2.5 a note of any action taken and by whom, decisions reached and the outcome;

2.2.6 the name and position of the person making the record.

2.3 Staff complete a form which should be submitted when reporting the matter in accordance with this policy. The form can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

3. Use of reasonable force

3.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. "Reasonable" in these circumstances means using no more force than is needed.

3.2 Staff should refer to the School code of conduct and the Staff code of conduct for more detailed guidance about the use of reasonable force.

Appendix 3: Good practice

Before any activity starts, the designated person shall ensure that adequate child protection procedures are in place, as follows.

- Each parent must fill out a Child Information Form for each child/young person attending the school.
- A register must be kept of all children/young people attending the school's activities and teachers and assistants, including information about late arrival.
- A signing-in book must be kept for all adults on the premises (volunteers, parents and visitors) who don't have a service agreement with the school.
- Team members will record any unusual events on the accident/incident form or in the daily diary, unless this includes anything confidential.
- Where possible, staff/volunteers should not be alone with a child/young person, although it is recognised that there may be times when this may be necessary or helpful.
- The school recognises that physical touch between adults and children/young people can be healthy and acceptable in public places. However, staff/volunteers will be discouraged from this in circumstances where an adult and child/young person are alone together.
- All team members should treat all children/young people with dignity and respect in their attitude, language and actions.
- The school does not arrange trips. The school may sponsor events, suggests cultural events or suggest meeting times/places outside the school or the lesson times. The children remain the responsibility of their parents/guardians in those events, including getting to and from those events.

Appendix 4: Safeguarding incident form



Pupil/Child name	Date of birth and Year Group/Class
Name and position of person completing form (please print)	
Date of incident /concern: (DD MM YY)	
Incident / concern (who what where when)*	
Any other relevant information (witnesses, immediate action taken)*	
Signature: (name of member of staff) Role:	Date form completed (DD MM YY):

Action taken (including reasons for decisions) and Outcomes*

(NB – this section is only to be completed by DSL)

Signature of DSL	Date (DD MM YY)
Signature of Lead DSL (if appropriate)	Date (DD MM YY)

Appendix 5: Lead and Deputy Safeguarding Role Description

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is responsible for promoting the safeguarding and welfare of children and young people within Petite école de Reigate.

The DSL ensures that safeguarding concerns are identified, recorded, and acted upon appropriately, and that a safe culture is maintained within school activities.

The DSL has authority to take immediate action where necessary to protect a child without waiting for prior approval when urgent intervention is required.

Deputy Designated Safeguarding Lead (DDSL)

The Deputy Designated Safeguarding Lead supports the DSL and assumes full safeguarding responsibility in the absence or unavailability of the DSL.

The DDSL must be trained to the same level as the DSL and be prepared to act independently when required.

Responsibilities of the Designated Safeguarding Lead / Deputy Designated Safeguarding Lead:

- Receive and manage safeguarding concerns, allegations, and incidents.
- Assess concerns and make referrals to relevant agencies where required (e.g. children's services, police, LADO, MASH).
- Maintain accurate and confidential safeguarding records.
- Ensure records are securely stored in accordance with the school Data Protection Policy.
- Work with the School Management Committee on safeguarding matters and policy updates.
- Ensure staff and volunteers understand safeguarding procedures.
- Ensure safeguarding training is provided and up to date.
- Provide a summary safeguarding report to the School Management Committee at least annually.

Training

The DSL and DDSL must:

- Complete appropriate safeguarding training.
- Refresh training at least every two years.

The DSL should also undertake Prevent awareness training.

Availability

- The DSL must be available during school activities.
- The DDSL must be appointed to ensure continuous safeguarding coverage.