

Safeguarding and Child Protection

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The policy will be reviewed annually as a minimum, unless lessons learnt or new legislation, national or local guidance suggests the need for an earlier date of review

Policy review dates and changes

Review date	By whom	Summary of changes made	Date ratified by governors	Date implemented
10/02/25	M. Hughes	Update to low level concern reporting Additional information for allegations Changes to DDSLs	12/02/25	24/02/25
01/10/25	M. Hughes	DCC policy Update KCSIE 2025	15/10/25	15/10/25
01/02/26	M. Hughes	Updates following staff changes	11/02/26	12/02/26
07/09/26	M Hughes	DCC policy Update KCSIE 2026	7/10/26	8/10/26

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This child protection/safeguarding policy outlines how the school/college will safeguard and promote children's welfare to keep our learners safe from abuse, neglect, and exploitation.

The policy applies to all adults, including volunteers, governors/trustees, supply staff and contractors working in or on behalf of the setting.

As defined in Working Together to Safeguard Children (2026) safeguarding and promoting the welfare of children as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Promoting the upbringing of children with their birth parents, or otherwise their family network[1] through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to achieve the best outcomes in line with the outcomes set out in the Children's Social Care National Framework[2]

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Children means everyone under the age of 18.

We help to keep children safe by:

- Providing safe environments, with secure access, where children can learn and develop
- Acting in the best interests of children to protect them online and offline, including when they are receiving remote education
- Providing a robust preventative education programme through a whole school approach
- At the earliest opportunity, identifying children who may need extra or community-based support, early help (this will be known as Family Help), intensive services and specialist services i.e., a child who is suffering or likely to suffer significant harm. This can include, but is not limited to, neglect, abuse (including by other children), grooming or exploitation
- Taking timely and appropriate safeguarding action for children who need extra help or who may be suffering, or likely to suffer, harm. This includes, if required, referring in a timely way to those who have the expertise to help
- Using safe recruitment processes

[1] A family network can be a blood-relative, or a non-related connected person, such as a family friend or neighbour

[2] Children's social care: national framework. The statutory national framework document is for those who work in local authority children's social care. It includes relevant information for all safeguarding partners and agencies who work with children's social care.

- Managing allegations that may meet the harm threshold and allegations/concerns that do not meet the harm threshold, referred to as low-level concerns

We will ensure that parents/carers and our partner agencies are aware of our child protection/ safeguarding policy by ensuring that it is on the school website. *Safeguarding posters are displayed at reception and key locations around Holly House School. Visitors receive safeguarding information at reception. Safeguarding arrangements are explained to parents and carers during induction and transition meetings and at parent–teacher meetings.*

The school website also has information about how parents/children/other agencies can contact the designated safeguarding lead and their deputy/ies and include their availability during out of school hours and school holidays.

Safeguarding and child protection policy statement

Holly House School operates a whole school approach and ethos to safeguarding and protecting children. Where safeguarding is concerned, we maintain an attitude of *"it could happen here"*. We recognise that everyone in the school has a role to play to keep children safe; this includes ensuring children feel heard and understood, identifying concerns, sharing information, and taking prompt action. Safeguarding and child protection is incorporated in all relevant aspects of processes and policy development. All systems, processes and policies operate with the best interests of a child at their centre.

Holly House School is a maintained special school with residential provision for children and young people with education, health and care plans. Our pupils have social, emotional and mental health needs and may also have communication differences, neurodevelopmental conditions, disabilities, health needs and experiences of trauma or disrupted education. These factors do not in themselves indicate abuse, but they may increase vulnerability, affect how distress is expressed and create additional barriers to recognising, understanding or reporting harm.

Safeguarding at Holly House therefore requires staff to understand each pupil's usual presentation, communication, relationships, behaviour and support needs. Changes in behaviour, emotional regulation, attendance, engagement, physical presentation, relationships or willingness to attend school or residence are considered in context and are never dismissed merely as part of a pupil's SEND or SEMH profile. Reasonable adjustments and communication support are integral to our safeguarding response.

We ensure that all children are safeguarded while on or off school premises and are proactive about anticipating and managing risks that children face in the wider community and online. To support this the school assesses the risks and issues in the wider community when considering the well-being and safety of its learners. At Holly House, risk assessment takes account of each pupil's EHC plan, SEMH and communication needs, previous experiences and current circumstances, together with information about school, residence, transport, online activity and the wider community. Particular attention is given to barriers to communicating concerns, changes from usual presentation, unsafe peer relationships, disrupted attendance and transitions between education and residential provision. The DSL considers individual information and local intelligence when assessing risk; the school does not assume that every pupil experiences the same vulnerabilities or that a particular form of exploitation or radicalisation is prevalent without supporting evidence.

To protect our learners, we have a Prevent action plan/risk assessment and are part of Operation Encompass (previously known locally as Stopping Domestic Abuse Together/ SDAT). Holly House

teaches personal safety, trusted adults and help-seeking, healthy relationships and online safety through PSHE/RSE, class activities and residential practice. Teaching is adapted to pupils' communication, developmental and learning needs. The safeguarding team uses relevant local and national information to inform teaching and responses to emerging risks.

The school recognises we have an important role to play in multi-agency safeguarding arrangements and contributes to multi-agency working as set out in Working Together to Safeguard Children (2026). As a relevant agency, the school understands its role within local safeguarding arrangements and operates in accordance with the Derby and Derbyshire Safeguarding Children multi-agency procedures, including the local criteria for action (known as the Threshold document) and the Derby and Derbyshire local protocol for assessment and support.

To support key multi-agency safeguarding communications, we have a dedicated secure safeguarding email address *Safeguarding1@hollyhouse.derbyshire.sch.uk*, which is accessible by at least two members of our safeguarding staff. During the school term and in school hours, this is checked daily. An 'out of office' message is operational during other times and in school holidays to advise partner agencies if and how often messages will be checked/responded to and when the school will reopen. *Holiday/out-of-hours safeguarding telephone: 07877842856. Main school telephone: 01246 450530.*

The school is also aware of and implements any local learning where appropriate, such as those as outlined in DDSCP Briefing Notes relating to learning from reviews or audit located in the multi-agency safeguarding children procedures document library. *Holly House's safeguarding, Family Liaison and residential teams work with parents and carers, children's social care, Early Help/Family Help services, CAMHS and other relevant health and support services according to each pupil's needs. Staff contribute to assessments, Team Around the Family meetings, child-in-need and child-protection processes, and other relevant multi-agency meetings. Relevant information is shared through the safeguarding arrangements set out in this policy.*

Context

This policy enables *Holly House School* to carry out our functions to safeguard and promote the welfare of children and must be read alongside key guidance:

- Department for Education's statutory guidance publications for schools and local authorities, including:
  - Working Together to Safeguard Children (2026)
  - Keeping Children Safe in Education (2026)
  - Designated teacher for looked-after and previously looked-after children (2018)
- Human Rights Act (1998) and Equality Act (2010), including the Public Sector Equality Duty
- Data Protection Act (2018), UK GDPR and Data (Use and Access) Act (2025) – known as 'data protection laws'
- Prevent Duty Guidance (2023) and The Prevent duty: safeguarding learners vulnerable to radicalisation (2023)
- Relationships and sex education (RSE) and health education
- Derby and Derbyshire Multi-agency Safeguarding Children procedures

Safeguarding is not just about protecting children from deliberate harm, neglect, exploitation, or failure to act, it relates to broader aspects of care and education. This policy therefore complements and supports a range of other school policies, such as:

- Children's health and safety and well-being, including their mental health
- Behaviour policy, including how we engage learners struggling to engage in school, mental health and behaviour, acceptable and non-acceptable behaviours, how we prevent and respond to bullying including cyber bullying, prejudiced based and discriminatory bullying and child-on-child abuse. This policy also outlines the school's screening, searching, and confiscating powers and how they will be used safely, proportionately, and appropriately, including police strip searches
- Staff, learner, and visitor acceptable use policy/agreements, as part of the school cyber awareness plan
- Use of restrictive intervention, including use of
- reasonable force and the increased vulnerability of children with special education needs and/or disabilities (SEND) and equality duties
- School attendance, including unexplainable and/or persistent absences from education, not in receipt of fulltime education or go missing from education, home, or care
- Suspension and permanent exclusion
- Meeting the needs of learners with medical conditions
- Support children in school with allergies
- Providing first aid
- Educational visits
- Intimate care
- Emotional well-being
- Online safety, including use of mobile and smart technology, AI, online safety at school and at home and other associated issues, including making or sharing nudes and semi-nudes, , appropriate filtering and monitoring, and how children can be kept safe from terrorist and extremist materials
- School mobile phone free policy – note this can be standalone or incorporated into the behaviour policy
- Safer recruitment and selection, including single central record
- Staff behaviour (code of conduct), including low level concerns, managing allegations against staff, including supply staff, contractors and volunteers incorporating 'duty to refer' and whistleblowing, acceptable use of smart technologies/mobile devices, staff/learner relationships and communications, including the use of social media
- School security and visitors
- Policy/agreement for visiting speakers
- SEND annual information report
- Relationships education (RE)/relationships and sex education (RSE) and health education (physical and mental well-being)
- Communications
- Complaints procedure
- Data protection policies and privacy notices, including record keeping and retention
- Information sharing

Section 2: What is abuse?

Abuse is a form of maltreatment of a child which may be caused by an adult, adults or by another child or children inflicting harm or by failing to prevent harm. The harm can involve physical, sexual, or emotional abuse, neglect and/or exploitation and can include witnessing the ill treatment of others, such as in all forms domestic abuse. Children can be at risk of abuse inside and outside of their home, in their community, inside and outside the school and online.

Safeguarding issues can put children at of risk harm. Behaviours linked to drug taking and/or alcohol misuse, unexplained and/or persistent absences or going missing from education, serious violence (including county lines), radicalisation, consensual/non-consensual sharing of nude and semi-nude images can be signs that children are at risk. Abuse, neglect, exploitation, and safeguarding issues are rarely stand-alone events; in most cases multiple issues will overlap with one another.

Safeguarding action may be needed to protect children from the following risks, which include abuse perpetrated by other children as well as by adults:

- Any concerns that a child has suffered or is at risk of suffering physical abuse, sexual abuse, emotional abuse, or neglect
- Bullying, including online bullying and prejudice-based bullying, racist, disability and homophobic or transphobic abuse
- Gender-based violence/violence against women and girls
- Harmful sexual behaviour, sexual harassment, online sexual abuse, and sexual violence between children. Online abuse can include sending abusive, harassing, and misogynistic or misandrist messages; making or sharing nudes and semi-nudes; and coercing others to make and share nudes/semi-nudes
- Radicalisation and/or extremist behaviour
- Child sexual exploitation and child criminal exploitation, including financial exploitation and county lines
- Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example youth produced sexual imagery
- Abuse within intimate personal relationships between children (sometimes known as 'teenage relationship' abuse, including physical, sexual, emotional abuse, and stalking)
- Upskirting[3]
- Substance use – drugs and/or alcohol
- Gang activity and serious violence, particularly affecting young males who have been excluded, have experienced trauma and have been involved in offending
- Domestic abuse
- Forced marriage, marriage/civil partnership under the age of 18, virginity testing or hymenoplasty, female genital mutilation and 'honour or faith based' abuse
- Children with Perplexing Presentations (PP) in whom illness is fabricated or induced (FII)
- Homelessness
- Other issues not listed here but that pose a risk to children

[3] Upskirting is taking a picture of someone's genitals or buttocks under their clothing without them knowing, either for sexual gratification or in order to humiliate or distress the individual. This is a criminal offence, see Voyeurism (Offences) Act (2019)

Further information about indicators of abuse and neglect as well as safeguarding risks noted above are located in Keeping Children Safe in Education (2026).

Section 3: School staff safeguarding roles and responsibilities

Staff induction

Staff and governors at *Holly House School* will have an induction appropriate to their roles, which will include organisation vision/ethos, aspirations, and expectations of all staff, as well as what is considered acceptable and what is not. New staff will also receive information about systems within the school which support safeguarding, including online safety and copies of policies; this includes:

- Child protection/ safeguarding policy, which includes how the school deals with child-on-child abuse
- School behaviour policy, which includes school measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Staff behaviour (code of conduct) policy, which includes acceptable use of technologies/mobile devices, online filtering and monitoring processes utilised and expectations associated with this, staff/learner relationship and communications, including the use of social media. The policy also incorporates low-level concerns, allegations against staff and whistleblowing
- Attendance policy and the safeguarding response to children where there are unexplainable and/or persistent absences or are missing from education
- The safeguarding response to child-on-child abuse
- The role and names of the designated safeguarding lead, their deputy/ies, the designated teacher for looked after children, the senior mental health lead, and the designated governor

All staff will:

- Receive a paper/electronic copy of, read and sign to say that they have received, read, and understood:
    - Those who work directly with children at least Part one of Keeping Children Safe in Education: for school and college staff (2026)
    - School leaders, including governors and designated safeguarding leads/deputies all of Keeping Children Safe in Education (2026)
    - Staff who do not work with children directly Keeping Children Safe in Education: for school and college staff (part 1) (2026)

All staff will:

- Be aware of:
    - Operation Encompass (previously known locally as Stopping Domestic Abuse Together /SDAT) a police-led early domestic abuse notification to schools, and the school dedicated safeguarding email address
    - The safeguarding response to children who are missing education or where there are unexplainable and/or persistent absences from education
    - The safeguarding response to child-on-child abuse
    - What private fostering arrangements are and the appropriate safeguarding response
    - The early help process for universal and community-based support and family help for children with emerging/additional needs and understand their role in it
    - The process for making a referral to local authority children's services and social care, the statutory assessments that may follow this and the role they may play in such assessments
    - The protocols for recording concerns on school systems

- Know what to do if a child tells them they are being abused, exploited, or neglected and will be able to reassure children they are being taken seriously, will be supported, and kept safe
- Know what to do if a child shares, produces, or receives a sexual communication, including making or sharing nudes/ semi-nudes
- Know what to do if a parent or carer shares any concerns about a child
- Be aware:
    - Children may not feel ready or know how to tell and/or might not recognise their experiences as harmful and that certain children may face additional barriers to telling
    - Any child may benefit from early help and be alert to the need for early/family help for some groups of children
    - Of the indicators of abuse, exploitation, and neglect, understand that children can be at risk inside and outside of the school, in their home, institutional or community setting and online
    - Children can abuse other children, referred to as child-on-child abuse, and the school policy to prevent and respond to it
    - Children with special education needs, disabilities (SEND) or health issues, particularly those with neurodevelopmental conditions such as autism, as well as those with certain medical or physical health conditions are particularly vulnerable to online and offline abuse, exploitation, and neglect - and also face additional barriers to the recognition of this abuse
    - In addition to children with SEND or health issues, that some groups of children are potentially at greater risk of harm, including children who need a social worker, children absent or missing from education or who are electively home educated, children requiring mental health support, looked after/previously looked after children and children who are, or may be, lesbian, gay, bisexual, or gender questioning
    - Technology is a significant component in many safeguarding and well-being issues
    - Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
    - That children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse
    - Of the '*one chance'* rule with suspected or actual victims of forced marriage and honour or faith-based abuse. That is, they may only have one opportunity to speak to a victim or potential victim to offer appropriate support and advice
    - Of the possible indicators, alongside other factors, and contexts, that a child is likely to be susceptible to an extremist ideology
    - Of the indicators which may signal children are at risk from, or involved with, serious violent crime
- Have the skills, knowledge and understanding to keep looked after children and previously looked after children safe
- Discuss/report any concerns they have about a child with the designated safeguarding lead or their deputy. If staff members are unsure, they should always speak to the designated safeguarding lead or their deputy

- Speak to the designated safeguarding lead or deputy about any concerns about honour or faith-based abuse, breast ironing, female genital mutilation (FGM)[4], virginity testing and hymenoplasty[5]
- Work with the designated safeguarding lead and do everything they can to support social care workers to help them carry out a statutory assessment
- Be mindful that early information sharing is vital to identifying and tackling all forms of abuse, exploitation, and neglect and in promoting children's welfare, including in relation to their educational outcomes

Governors and the management of school safeguarding
As outlined in Keeping Children Safe in Education (2026) the governing body have a strategic leadership responsibility for the school safeguarding arrangements and has/have the responsibility to ensure that the school complies with safeguarding duties under legislation. There is a senior board level member who takes leadership responsibility for the establishment's safeguarding arrangements.

The governing body and their senior leadership teams and designated safeguarding lead are aware of and follow local arrangements. This includes understanding and applying the Threshold document (criteria for action), Derby and Derbyshire Local Protocol for Assessment and Support, Derby and Derbyshire Child Protection Conference Professional Dissent process and Dispute Resolution and Escalation protocol. Arrangements have been made to set out information sharing processes and principles within the school and with local authority children's social care, safeguarding partners (Derby and Derbyshire Safeguarding Children Partnership/DDSCP) and other agencies. The school will supply information as requested by the DDSCP which enables and assists partners to perform their functions to safeguard and promote the welfare of children in their area, including information related to local and national child safeguarding practice reviews.

Governors exercise strategic oversight of all aspects of safeguarding in the school and this is a standing item at all governing body meetings and recorded in minutes. To support this on an annual basis:

- A safeguarding audit is undertaken to ensure the effectiveness of safeguarding policies and processes. *(Note: Derbyshire County Council and Derby City Council provide an annual safeguarding audit tool for schools.)*
- A review and risk assessment of the school approach to online safety, policy and practice.

Headteacher
The school headteacher will ensure that the policies and procedures, adopted by their governing body and proprietors, are understood, and followed by all staff. This includes working with the designated safeguarding lead, their deputy, and other senior leaders, to ensure the effectiveness of safeguarding within the school and ensuring that educational outcomes of children who have or have had a social worker are promoted.

Designated safeguarding lead and deputy designated safeguarding lead
A member of the senior leadership team is appointed to the role of designated safeguarding lead. They take a lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

[4] There is a specific legal duty on teachers to report acts of FGM on girls under 18 to the police
[5] It is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK; see multi-agency guidance for more information

The designated safeguarding lead co-ordinates the setting's safeguarding and child protection arrangements. They provide advice and support to other staff on child welfare, safeguarding and child protection matters, including Operation Encompass notifications, take part in strategy discussions/meetings and inter-agency meetings – and/or supports other staff to do so - and contributes to the assessment of children.

The establishment also has a deputy designated safeguarding lead to cover for when the designated safeguarding lead is not available; the lead responsibility however remains with the designated safeguarding lead. *Robin Rhodes is the school DSL. Chris White, Sarah Brent, Ross Dove and Jennifer Bates are DDSLs. Cheryl Gray is Head of Care and Residential DSL. During school hours, staff must contact the DSL or a DDSL directly about safeguarding concerns. Where they are unavailable, staff must contact the most senior person on site without delay. Outside normal school hours, residential safeguarding cover is provided through the Residential DSL or DDSLs working in residence. Holiday safeguarding communications are covered through the Family Liaison/DDSL arrangements. The school's safeguarding contact details are set out in Section 4. Recording a concern electronically does not replace direct contact where urgent action is required.*

The designated safeguarding lead actively liaises with other school staff with safeguarding responsibilities, teachers, pastoral support staff, school nurses, IT leads, SENCos and senior mental health leads on matters of safety and safeguarding to ensure safeguarding and promoting children's well-being are effective.

The designated safeguarding lead or a deputy is always available during school hours for the staff in the school to discuss any safeguarding concerns.

More information about the role and responsibilities of the designated safeguarding lead can be found in Keeping Children Safe in Education (2026) Annex B: Role of the designated safeguarding lead.

Safeguarding training

All staff and governors are equipped with the knowledge and skills to keep children safe. In addition to the safeguarding training at induction, all staff and governors will receive safeguarding training appropriate to their roles and responsibilities which is regularly updated[6]. They also receive training on the Prevent Duty, child-on-child abuse, private fostering and online safety training (which includes effective responses to sharing nudes/semi-nudes, including those generated by AI and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). All staff and governors will also receive regular safeguarding and child protection (including online safety) updates at least annually. This will help provide them with an awareness of safeguarding issues that can put children at the risk of harm ensuring they have the relevant skills and knowledge to safeguard children effectively.

All staff will receive training on:

- Attendance, with dedicated attendance training for any staff with a specified attendance function in their role, including administrative, pastoral, or family support staff, and senior leaders.

[6] See DDSCP multi-agency training pathway on the training page of www.ddscp.org.uk

- Data protection (including recording protocols) and cyber security, with in-depth data protection training for DSLs in line with Keeping Children Safe in Education, Annex B: Role of the designated safeguarding lead.

The governors' safeguarding training and updates will enable them to have the knowledge to provide strategic challenge to test and assure themselves that safeguarding processes and procedures are effective and robust. They will ensure that a whole school approach to safeguarding is in place.

Those involved with the recruitment and employment of staff to work with children will have received appropriate safer recruitment training.

Section 4: Key safeguarding contacts

School staff with specific safeguarding responsibilities

Safeguarding Role	Name and Role	School contact details
Designated Safeguarding Lead	Robin Rhodes DSL	01246 450530; Safeguarding email: Safeguarding1@hollyhouse.derbyshire.sch.uk; holiday/out-of-hours safeguarding telephone: 07877842856
Senior Leader(s) available for contact in the absence of the designated safeguarding lead	Cheryl Gray Residential DSL	Contact via the school office: 01246 450530 Safeguarding1@hollyhouse.derbyshire.sch.uk
Deputy Designated Safeguarding Lead	Chris White, Sarah Brent, Ross Dove and Jennifer Bates	Contact via the school office: 01246 450530
Other staff with safeguarding responsibilities	Marc Hughes Head Teacher	01246 450530
Attendance Lead	Robin Rhodes	01246 450530
SENCo	Marcus Walker	01246 450530
Designated Safeguarding Governor	Caroline Bell — subject to confirmation before publication	01246 450530
Designated Teacher for Looked After/ previously Looked After Children	Marcus Walker	01246 450530
Senior Lead/s for Mental Health and Well-being	Sarah Brent, Cheryl Gray	01246 450530
Governor for Mental Health and Well-being	Ian Sabroe	01246 450530
PHSE/RSE Lead	S. Klafkowski	01246 450530
SLT Digital Lead	Marc Hughes	01246 450530
Date Protection Officer	Jo Canavan	01246 450 530
Prevent Lead	Robin Rhodes	01246 450530; Safeguarding1@hollyhouse.derbyshire.sch.uk
Operation Encompass Key Adult	Robin Rhodes	01246 450530; Safeguarding1@hollyhouse.derbyshire.sch.uk
Chair of Governors	Phil Pierce	Contact via the school office: 01246 450530
IT provider/contact	James Hartle, Blue Gecko	01246 450530;

Other Key Local Safeguarding Contacts

	Derby	Derbyshire
Early/Family Help and Advice	• Derby City Family Hubs and Early Help • Early Help Advisors, see Safeguarding Children Procedures Contacts, advice and further information Holly House's Family Liaison Officer/DDSL, Sarah Brent, coordinates school liaison with the relevant locality service according to the child's home address and needs.	• Family Help Service • For advice contact Starting Point Consultation and Advice Service for Professionals via 01629 535353 Holly House's Family Liaison Officer/DDSL, Sarah Brent, coordinates school liaison with the relevant locality service according to the child's home address and needs.
Targeted Early/Family Help requests	Locality Vulnerable Children Meeting (VCM)/ Family Help Forums (FHF) for requests for targeted early help via multi-agency team (MAT) or non-urgent social care referrals via Locality Casework Support Officers	Requests for support from professionals should be made via the online request for support unless a child is at risk of Significant Harm
Speak to a Social Worker for thresholds advice and consultation	Children's Services Professional Consultation Line 07812 300329	Starting Point Consultation and Advice Service for Professionals 01629 535353
Referrals to Local Authority Children's Social Care	***Initial Response Team*** **Urgent:** 01332 641172 or out of hours via Careline 01332 956606 **Non urgent:** Derby Children's Social Care Online Referral system	***Starting Point*** **Urgent:** Call Derbyshire 01629 533 190 **Non urgent:** Starting Point online
Local Authority Designated Officer (LADO)	Derby LADO advice form Derby and Derbyshire LADO referral form **Email:** CPMduty@derby.gov.uk	Derby and Derbyshire LADO referral form **Email:** professional.allegations@derbyshire.gov.uk
Derbyshire Police	• 999 for emergencies or 101 for non-emergencies • Mandatory reporting of Female Genital Mutilation (FGM) via 101 • School liaison is coordinated by the DSL through Derbyshire Police using the contact routes above. • Also see *When to call the police – guidance for schools and colleges*	
Prevent (radicalisation and extremism)	• For advice contact the Local Authority Prevent Team: Derbyshire - 01629 535646 or prevent@derbyshire.gov.uk Derby - Prevent@derby.gov.uk • Police Prevent (radicalisation/extremism) Team on 101 or directly via 0300 1228694. For emergencies phone 999. See Refer someone to the Derbyshire Prevent Team (Derbyshire Constabulary) • Reporting extremism concerns about an adult working in an education setting submit the details at report extremism in education	

	Derby	Derbyshire
Children absent from education	• Holly House contact: Robin Rhodes, Attendance Lead and DSL, via 01246 450530. • Derby Education Welfare Service (EWS) • Elective home education (EHE) • Children missing education (CME)	• Holly House contact: Robin Rhodes, Attendance Lead and DSL, via 01246 450530. • Derbyshire Education Welfare Services • Elective home education (EHE) • Children missing education (CME) • See Children missing from education for further information on guidance, policies and procedures relating to school age children missing from education
Virtual School for Looked After Children	• Virtual School Head - 07812 301044 or graeme.ferguson@derby.gov.uk • Marcus Walker, Designated Teacher, liaises with the relevant Virtual School and the child's allocated support officer.	Helen Moxon, Virtual School Headteacher 01629 538028 virtualschool@derbyshire.gov.uk • Marcus Walker, Designated Teacher, liaises with the relevant Virtual School and the child's allocated support officer.
Public Health Nurse/other health contact/s	• The safeguarding and Family Liaison teams liaise with the relevant health professional according to the pupil's needs. Child-specific professional contact details are held securely in the pupil's records.	• The safeguarding and Family Liaison teams liaise with the relevant health professional according to the pupil's needs. Child-specific professional contact details are held securely in the pupil's records.
Emotional Health and Well-being Services	Advice and support are accessed according to the pupil's needs through the following existing local service information and pathways. *emotional well-being and mental health services, including school Mental Health Support Teams, North Derbyshire* Specialist Community Advisors or Derby/South Derbyshire CAMHS Duty (0300 123 9164) during office hours (Monday-Friday 09:00-17:00), out of hours, please contact the Derbyshire Mental Health Helpline and Support Service (Call 111 and select the 'mental health' option, option 2). *Derby and Derbyshire Mental Health Pathway Guidance*	
Domestic Abuse	• Safer Derby City • Derbyshire constabulary - information and advice about domestic abuse webpages	• Safer Derbyshire domestic abuse webpage • Derbyshire constabulary - information and advice about domestic abuse webpages
Cyberchoices	For children at risk of being drawn into cybercrime via East Midlands Cyber Secure	
Homelessness or at risk of homelessness	Derby city council homelessness webpages	Contact the housing or homelessness service for the district in which the child or family lives; the Family Liaison

	Derby	Derbyshire
		team supports liaison where appropriate.

Key National Contacts

Organisation	Description and contact details
NSPCC helpline for adults	Helping adults protect children 24 hours a day. For help and support, including anyone needing advice about female genital mutilation, young people affected by gangs, concerns that someone may be a victim of modern slavery contact the NSPCC trained helpline counsellors on: • Text 88858 • 0808 800 5000 • help@nspcc.org.uk
NSPCC helpline Report Abuse in Education	Bespoke helpline for children and young people who've experienced abuse at school, and for worried adults and professionals who need support and guidance including for non-recent abuse: • 0800 136 663 • help@nspcc.org.uk
NSPCC Whistleblowing Advice	Free advice and support for professionals concerned about how child protection issues are being handled in their organisation: • 0800 028 0285 • help@nspcc.org.uk
UK Safer Internet Centre professional advice line	Helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care: • helpline@saferinternet.org.uk
Police Anti-Terrorist Hot Line number	0800 789 321
National Domestic Abuse Helpline	Hosted by Refuge, Helpline 0808 2000247
Operation Encompass	Information, resources and elearning for schools
Report harmful online content	• UK Safer Internet Centre – report online harm. A national reporting centre that has been designed to assist anyone in reporting harmful content online • CEOP – to report online sexual abuse or the way someone has been communicating online • Report online material promoting terrorism or extremism
Report Abuse in Education helpline	• Young people who have experienced abuse at school and parents and teachers who are concerned about sexual abuse in education settings can call the Report Abuse in Education helpline on 0800 136 663 or email help@nspcc.org.uk
Harmful Sexual Behaviour Support Services	• SWGfL Harmful Sexual Behaviour Support Service/Marie Collins Foundation guidance, resources, and online video training package.

Organisation	Description and contact details
	• Stop it now! For worries about a child's sexual behaviour, 0808 1000 900. Includes Shore which provides a safe and anonymous place for young people to get help and support. The aim is to prevent harmful sexual behaviours among young people.

Section 5: Ensuring a safe environment for all children

Our school provides a safe environment where children can learn and develop. This is an essential part of our whole school approach to safeguarding which incorporates a culture of vigilance where children's welfare is promoted, timely and appropriate safeguarding action is taken for children who need extra help or who may be suffering, or likely to suffer harm.

The school environment is safe and secure and protects our learners from harm or the risk of harm. Positive behaviours are consistently promoted, and abusive or inappropriate behaviour challenged. A positive and supportive environment is promoted which gives learners a sense of being valued.

The school complies with obligations under the Equality Act and relevant school premises regulations. We carefully consider how we support children with regard to protected characteristics and, where needed, make reasonable adjustments for disabled children.

The school follows regulations and safeguarding requirements relating to school premises and sport. We provide appropriate toilet, changing and shower facilities and ensure that sport is safe and fair.

Vulnerable children
We recognise that some groups of children are potentially at greater risk of harm (both online and offline) than others and have agreed arrangements to ensure the safety of these children:

- **Children who need a social worker (Child in Need and Child Protection Plans**). As a matter of routine, the designated safeguarding lead will hold and use the information that the child has a social worker to ensure that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. In addition, the school will work with the virtual head as appropriate, regarding the educational attendance, attainment, and progress of children with a social worker.

- **Children who are absent from education.** The school proactively manages and take steps to improve attendance across our community. Attendance is the essential foundation to positive outcomes for all our learners and is everyone's responsibility in school.

  The school response to children who are absent from education, particularly on repeat occasions and/or prolonged periods, supports identifying a range of safeguarding issues, abuse, neglect and sexual or criminal exploitation, including county lines; it also helps prevent the risk of absent children becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker, where being absent from education may increase known safeguarding risks within the family or in the community. We support and monitor attendance and absence carefully to identify learners or cohorts that require support with their attendance and put effective strategies in place. This includes:
    - Building strong relationships with families, listening to, and understanding barriers to attendance and working with families to remove them.

- Sharing information and work collaboratively with other schools in the area, the local authority, and other partners when absence is at risk of becoming persistent or severe.

Robin Rhodes, Attendance Lead and DSL, works with the Family Liaison team, class teams and residential staff to identify attendance concerns, understand barriers and agree support with families and relevant professionals. Changes in attendance or willingness to attend school or residence are considered as possible safeguarding indicators alongside each pupil's usual presentation and known circumstances. Staff follow the school's Attendance Policy and the reporting and escalation arrangements in this safeguarding policy. *See Derby Schools and Colleges webpages or the Schools' Information Portal and Derbyshire Schoolsnet webpages*

The school also recognises that when children are not in school, such as when a learner is on a reduced timetable, suspended or excluded, they miss the protection and opportunities that education can provide, and can become more vulnerable to harm, exploitation and being involved in serious violence. Learners who have a social worker, including looked-after children, and previously looked-after children, are especially vulnerable. The school proactively supports learners in the school environment and decision-making processes about reduced timetables, suspension or exclusion and operates in the best interest of children as outlined in local and national guidance. *Holly House uses relationship-based, trauma-informed practice and Positive Behaviour Support to help pupils remain engaged in education. Support is informed by individual needs and plans, with approaches including Zones of Regulation and Thrive where appropriate. Decisions about reduced timetables, suspension or exclusion must consider safeguarding risks and continuity of support. These arrangements are not treated as interchangeable with alternative provision. See national guidance Behaviour in Schools (2024), Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England, including pupil movement (2026), Supporting pupils at school with medical conditions (2015) and local guidance Derby part-time timetable guidance and a protocol and Derby In Year Fair Access (IYFA) and Exclusions or Derbyshire part-time timetables and Derbyshire attendance management and exclusions*

- **Elective home education.** Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will seek to co-ordinate a meeting with the parents/carers, Local Authority, and other key professionals where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child and is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where a child has an Education, Health and Care Plan (EHCP) the local authority should review the plan with parents/carers. Where a child is taken off roll, we will inform the Local Authority of the deletion from our admission register via the system outlined on the Derby or Derbyshire elective home education webpages.

- **Children who require mental health support.** The school has an important role to play in supporting the well-being and mental health of our learners. Staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. Mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. We have clear systems and processes in place for identifying possible emotional well-being issues

and mental health problems, seek advice from external agencies where appropriate and have clear referral and accountability systems. *Holly House's support includes class and keyworker teams, Family Liaison Officer/DDSL Sarah Brent, the safeguarding team and residential staff led by Cheryl Gray. Sarah Brent and Cheryl Gray are trained Mental Health First Aiders. Staff use relationship-based and trauma-informed approaches, including Zones of Regulation and Thrive where appropriate; residential practice also includes PACE. Concerns requiring safeguarding assessment are referred promptly to the DSL or a DDSL. External health advice and support are sought according to need; school staff do not make clinical diagnoses.*

See Derby and Derbyshire Mental Health *Pathway* Guidance.

- **Looked after children and previously looked after children.** The school ensures that appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead has:
    - Details of the child's social worker, and
    - The name and contact details of the virtual school head and the relevant support officer in the authority that looks after the child
    - The name of the Personal Advisor appointed to support a child who has left care

  When dealing with looked after children and previously looked after children, the school will work with all local authority children's social care, health and other relevant agencies and take prompt action when necessary to safeguard these children, who are a particularly vulnerable group. The school has a named designated teacher, who has appropriate training, relevant qualifications, and experience. They work with the Virtual School, to promote the educational achievement of learners who are looked after, have left care through adoption, special guardianship, or child arrangement orders, or adopted from state care outside of England and Wales. In addition, the school recognises the distinct needs of children in kinship care and will, alongside the Virtual School, seek to will promote their education outcomes. *Marcus Walker is the Designated Teacher for looked-after and previously looked-after children. He works with the DSL, relevant class and residential staff, carers, social workers and the appropriate Virtual School to support safeguarding, attendance, learning and continuity of provision. Support takes account of each pupil's EHC plan, care arrangements and individual needs.*

- **Young carers.** The school is alert to children who are young carers and recognise that this can impact on their attendance, behaviour and well-being.

- **Children with special educational needs and disabilities (SEND).** The school recognises that these children may face extra safeguarding challenges both online and offline. Additional barriers can also exist when recognising abuse, neglect, and exploitation. The designated safeguarding lead and SENCo/named person with oversight of SEND will closely liaise whenever there are any concerns or reports of abuse, neglect or exploitation involving a child with SEND, neurodevelopmental conditions such as autism or certain medical or physical health conditions. The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. *At Holly House, pastoral and safeguarding responses are informed by the pupil's EHC plan, individual support arrangements and usual presentation. Class, Family Liaison and residential teams share relevant information with the*

safeguarding team. Staff consider individual communication needs and make reasonable adjustments, including clear language, additional processing time, visual supports and alternative or augmentative communication where relevant. Staff must not dismiss changes or indicators of harm as an inevitable consequence of SEND or SEMH needs.

- **Children with medical conditions.** The school supports support learners with a wide range of medical conditions, including allergy, so that they can access learning, feel valued and safe, and succeed. We recognise that children and young people with medical conditions have higher rates of absence than their peers as a result of their medical condition and are likely to need additional support and flexibility. The school has a policy for supporting pupils with medical conditions that is reviewed regularly and is readily accessible to parents and school staff. *See Supporting pupils at school with medical conditions (2015) (guidance currently being revised) and Allergy safety in schools (2026)*

- **Children who are, or may be, lesbian, gay or bisexual.** The school will take steps to reduce the additional barriers these children face, address vulnerabilities such as the risk of bullying by taking steps to prevent it and create a culture where they can speak out or share their concerns with staff

- **Children who are questioning their gender.** When a child or parent/carer makes a request relating to social transition, the school will be aware of the potential vulnerabilities of a child who is questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

- **Private fostering.** In addition to the above the school recognises the additional vulnerability of children in private fostering arrangements. A private fostering arrangement is essentially one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. When such arrangements come to our attention, we will notify the local authority to check the arrangement is suitable and safe for the child. Notifications will contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and made in writing. See statutory guidance Children Act 1989: private fostering.

We also recognise that in addition to the above, other factors can increase a child's vulnerability to abuse, exploitation, or neglect such as:

- In a family circumstance presenting challenges for the child, such as parental substance (drugs and/or alcohol) use, adult mental health issues and domestic abuse
- Misusing drugs and/or alcohol
- Being an asylum seeker/refugee
- Being from our new communities
- Living away from home, including private fostering arrangements, or have returned home to their family from care
- Are at risk of homelessness or living in temporary accommodation
- Living in chaotic, neglectful, and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of age, gender reassignment, marriage/civil partnership, pregnancy/maternity leave, disability, race

(including colour, nationality, ethnic or national origin), religion/belief, gender, sex, or sexual orientation
- Being a young carer
- Not speaking or not having English as a first language
- Being involved in the court system
- Children affected by parental offending or with family members in prison

Support is determined by individual need rather than assumptions about a pupil or family. The DSL works with class, Family Liaison and residential teams to identify safeguarding and pastoral needs, agree appropriate support and involve relevant external services. Safeguarding information and reporting arrangements are explained in accessible ways, with communication or language support arranged where needed.

Residential provision

Holly House School provides residential accommodation and recognises that residential special schools have additional safeguarding responsibilities. The school complies with the safeguarding requirements applicable to residential special schools, including the National Minimum Standards for Residential Special Schools, and ensures that school and residential safeguarding arrangements operate as one coherent system.

The school is particularly alert to:

- the additional vulnerability of children with SEND, SEMH needs, communication differences and previous experiences of trauma;
- inappropriate or unsafe relationships between pupils;
- child-on-child abuse, including harassment, harmful sexual behaviour, coercion, bullying and abuse occurring within bedrooms, bathrooms, shared spaces, transport or online;
- risks arising during evenings, overnight stays, transitions between school and residence, periods of reduced staffing and unstructured time;
- privacy, dignity and safety in bedrooms, toilets, bathrooms, showers and changing arrangements;
- missing-from-residence or absent-without-authorisation incidents;
- the safe administration of medication and management of health needs;
- the suitability, conduct and supervision of residential staff, agency staff, visitors and contractors;
- pupils' access to trusted adults, independent visitors, advocacy and accessible complaints arrangements;
- the need to share relevant safeguarding information promptly between education and residential staff and with parents, carers, social workers, placing authorities and other professionals.

The DSL has oversight of safeguarding across both the education and residential provisions. Residential staff record and report concerns through the same safeguarding system and reporting pathways as school-based staff. Urgent concerns are passed immediately to the DSL or a DDSL and are not left until the following school day.

The DSL or a DDSL is available during school hours. Outside normal school hours, safeguarding cover is provided through the residential DSL or DDSLs working within the residential provision. During school holidays, safeguarding communications are monitored through the agreed Family Liaison/DDSL arrangements. If a safeguarding lead is unavailable, concerns are raised with the most senior person on site, without delay.

The residential provision operates in accordance with the school's Residential Statement of Purpose, which describes the aims, admissions arrangements, accommodation, staffing structure, therapeutic approaches and support offered within residence. Residential safeguarding

arrangements are implemented through a suite of supporting policies and procedures which work alongside this Safeguarding and Child Protection Policy. These include, but are not limited to:

- Missing from Residence and Unauthorised Absence Procedures;
- Medication Management and Administration Policy;
- Intimate Care Policy;
- Advocacy, Representation and Complaints Procedures;
- Behaviour Support and Positive Behaviour Management Policy;
- Staffing, Supervision, Safer Recruitment and Staff Development Procedures.

Residential, education and safeguarding staff operate within a single safeguarding framework, ensuring that concerns, incidents, risk assessments, complaints, behavioural incidents, medication concerns and missing-from-residence incidents are reported, recorded, reviewed and escalated consistently. Information is shared appropriately between education and residential teams to promote children's safety, welfare and positive outcomes. Parents, carers, placing authorities and relevant professionals are provided with information about these arrangements through the Residential Statement of Purpose and associated policies.

Teaching safeguarding
We are committed to offering our learners age and developmentally appropriate preventative education to ensure that learners are aware of personal safety, safeguarding risks, recognise when they are at risk and how and where to get help and support if they need it. They will be taught about safe use of technology, online harms, healthy relationships online and offline, how to keep themselves and others safe, including online and where to seek help. We recognise the new safeguarding risks caused by rapid technological developments and the need to support and educate children about these. To be effective, we employ best practice principles to ensure there is a safe and supportive environment and to facilitate participative and interactive education which aims to support and not to alarm pupils. We refer to the Effective Working Together Guidance: Supporting Schools to Deliver the PSHE Programme guidance to help to ensure that the input of external visitors to school enhances our PSHE programme.

The school is sensitive to our learners' circumstances and recognises teaching will need to be tailored to the specific needs and vulnerabilities of individual children, including those who have been victims of abuse, children with special educational needs and disabilities and other vulnerabilities.

Our preventative education forms part of our whole school approach to prepare our learners for life in modern Britain, encourages open debate about different points of view and beliefs and creates a culture of zero tolerance for sexism, racism, misogyny/ misandry, disablism, racism, homophobia, biphobia and sexual violence/harassment derogatory behaviour or other forms of physical violence and conflict. It is responsive to contextual, local, and national data, issues, and trends to ensure it is meeting the challenges that children are facing.

The school's core values and standards, alongside the fundamental British Values, are upheld and demonstrated throughout all aspects of the school. This is underpinned by the school's behaviour policy, pastoral support system and our planned evidence-based relationships

education/relationships and sex education and health education and reinforced throughout the whole curriculum.

See *Holly House School* relationships education/relationships and sex education and health education policy and behaviour policy.

Online safety

Online safety and protecting learners from potentially harmful and inappropriate online material forms part of the whole school approach to safeguarding, including policies, curriculum, staff training, roles and responsibilities of the designated safeguarding lead and parental engagement. The school has filtering and monitoring systems in place, informed in part, by the risk assessment required by the Prevent Duty, which meet the current DfE filtering and monitoring standards. This includes:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems
- Reviewing filtering and monitoring provision at once every academic year
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning
- Having effective monitoring strategies in place that meet safeguarding needs

The school uses the DfE 'plan technology for your school service' to self-assess against filtering and monitoring standards and takes action on recommendations. In addition, we refer to Generative AI: product safety expectations guidance and Generative artificial intelligence (AI) in education to use AI safety. To address the risk of AI image manipulation, the school refers to considerations and best practice in the use of photos and videos across our online platforms as outlined in Protecting your setting's images from AI manipulation and abuse guidance.

The school safeguards children by protecting personal information and ensuring appropriate cyber security systems are in place in line with Cyber security standards for schools and colleges.

The school protects and educates learners and staff in their use of technology, including where they are learning remotely, and has mechanisms to identify, intervene and escalate any concerns where this is needed.

The school online safety policy outlines how the four areas of risk, content, contact, conduct and commerce, will be addressed to protect and educate learners and staff. It also incorporates the use of mobile and smart technology and appropriate filtering and monitoring on school devices and networks. Security protection procedures which meet the current Cyber security standards for schools and colleges are in place in order to safeguard the systems, staff and learners and review the effectiveness of these procedures to keep up with ever evolving cyber-crime technologies. The school is also in regular communication with parents and carers and uses these communications to reinforce online safety and the systems the school use to protect children from online harms.

To ensure that online safety is effective, especially as technology and the associated risks and harms evolve and change, the school undertakes an annual review of our approach to online safety, and an annual risk assessment to consider and reflect the risks children face.

For more information see school's online safety and AI policies.

Systems for children to report concerns and abuse
Our school recognises the importance of ensuring that all children feel heard and understood. We have a culture of listening to children and taking account of their wishes and feelings in any measures the school may put in place to protect them. Whenever there are any concerns, the child's wishes will be taken into account when determining what action to take and what services are provided. The welfare and safety of a child is of paramount concern and staff will act in the best interests of the child.

We understand the difficulties that children may have in approaching staff about their circumstances and any concerns they may have. Some children may feel unable to report their concerns or abuse, others may have additional barriers to telling someone or may not recognise what is happening is abusive.

Holly House's safeguarding culture is rooted in Relationships, Respect and Responsibility. Staff build trusted relationships, listen to pupils and respond to behaviour as communication while maintaining professional curiosity and acting promptly on safeguarding concerns.

Children, parents/carers, and all staff will be free to talk about any concerns and see the school as a safe place. Many children can show signs or act in ways they hope adults will notice or react to, others may make indirect reports via a friend or staff may overhear conversations. All staff are alert to this and to the potential need for early/family help and are aware of the indicators of abuse, exploitation and neglect and know what actions they should take.

The school has systems in place for children to complain and/or confidently report their concerns, including any form of abuse or neglect, including child-on-child abuse, and know that their concerns will be treated seriously. Pupils can raise concerns with any trusted adult, including their class or keyworker team, the DSL or DDSLs, Family Liaison staff and residential staff. They can also raise concerns through pupil meetings, the Independent Person and the school's or residential provision's complaints arrangements. Safeguarding posters and reminders reinforce how to seek help. Staff explain these routes in ways each pupil can understand and provide communication support, visual supports or alternative or augmentative communication where relevant. Pupils do not have to make a verbal disclosure: staff also act on indirect communication and changes in behaviour or presentation. Concerns are taken seriously and passed promptly to the safeguarding team.

Working with parents and carers
We recognise the importance of working together with parents/carers to educate as well as safeguard and promote the welfare of children.

Holly House School will ensure that:

- We work with parents positively, openly, and honestly
- Parents are encouraged to discuss their issues or concerns about safety and welfare of children, including any worries about a child's emotional well-being or mental health. They will be listened to and taken seriously
- Parents are aware there is a whole school safeguarding approach to ensure that children are kept safe and well, and the school is part of Operation Encompass (previously known locally as Stopping Domestic Abuse Together/SDAT)
- We work with parents to ensure they understand that effective RSHE is important for promoting and protecting the wellbeing of all children

- We will provide parents with information about safeguarding issues, such as child exploitation (sexual and criminal), child-on-child abuse, emotional well-being/mental health, online safety/harms, including nudes and semi-nudes, harmful sexual behaviour, and terrorist/extremist material. We will also outline the support available to keep children safe within the school, locally and nationally
- Up to date and accurate information is kept about learners i.e.
    - names and contact persons with whom the child normally lives
    - those with parental responsibility
    - where reasonably possible, we hold more than one emergency contact number
    - if different from above, those authorised to collect the child from the setting
    - name and contact details of GP
    - any relevant court orders or any other factors which may impact on the safety and welfare of the child
- Information about our learners given to us by children themselves, their parents, or carers or by other agencies will remain confidential. Staff will be given relevant information on a 'need to know' basis in order to support the child
- It is made clear to parents and carers that the school has a duty to share information when there are any safeguarding concerns. Also, that there is a duty to keep records which relate to safeguarding work by the school, or partner agencies. These will be kept securely, kept apart from the main pupil/student record and only accessible to key members of staff. Copies of these records will be securely sent to any education provider to which the child transfers and a confirmation of receipt obtained
- Where we have reason to be concerned about the welfare of a child, we will always seek to discuss this with the child's parents or carers first. However, there may be occasions where we are not able to do this, for example, when by doing so, it places the child at additional risk or where it may not be possible to speak to the parents/carers
- *Parents and carers may raise concerns through the Family Liaison team, their child's class team, residential staff or the safeguarding team. School contact details, including the secure safeguarding email and holiday/out-of-hours telephone number, are provided in Section 4. Staff explain next steps and information-sharing arrangements, subject to the safeguarding exceptions set out in this policy.*

Section 6: Responding to concerns about a child's welfare

Key points to remember for any member of staff (including volunteers or supply staff) or visitors whenever they have any concerns about a child's welfare:

- In an emergency take the action necessary to help the child, for example, call 999
- Do not assume a colleague or another professional will share information that might be critical to keeping a child safe. Early information sharing is vital in keeping children safe, whether this is when problems first emerge, or when a child is already known to local authority children's social care
- Report your concern, including any possible private fostering arrangements, to the designated safeguarding lead or their deputy as soon as you can and by the end of the day at the latest. *At Holly House, staff report concerns directly to the DSL or a DDSL and record them on MyConcern. Urgent concerns require immediate direct contact; staff must not rely on an electronic entry being read or wait until the end of the day.*
- If you are unsure speak to the designated safeguarding lead or their deputy
- If the designated safeguarding lead or their deputy is not around, ensure the information is shared with the most senior person in the school that day. The concerns and any action taken must then be shared with the designated safeguarding lead as soon as it is possible
- A safeguarding approach must be taken when addressing concerns about nudes/semi-nudes, including those generated by AI, staff should not view, copy, print or share the images
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends, or family
- As soon as you are able, complete a record of the concerns. This should be on the same day and before the child is due to leave the school premises Record the concern on MyConcern, including what was observed or reported, the date and time, the people involved and any immediate action taken. Preserve the child's own words where possible and distinguish observation from opinion. Where electronic access is unavailable, make a factual written record, pass it securely to the appropriate safeguarding lead and arrange for it to be added to MyConcern. Appendix 1 remains available as the example concerns form. *(see Appendix 1: Example Concerns Form)*
- Seek support for yourself if you are distressed. Staff who need support following a safeguarding concern should speak confidentially with the DSL, a DDSL or their line manager. Support may also be sought from Sarah Brent or Cheryl Gray as trained Mental Health First Aiders. Information about the child or concern must remain restricted to those who need to know.

Staff must always **immediately** inform the designated safeguarding lead or their deputy if there are any:

- Concerns that a child is presenting signs or symptoms of abuse, exploitation, or neglect, including suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- Concerns about a child carrying or using a weapon, or expressing intent to do so
- Searching incidents where there are reasonable grounds to suspect a learner was in possession of a prohibited item[7] or where a search has revealed a safeguarding risk

[7] Prohibited items include knives and weapons, alcohol, illegal drugs, stolen items, tobacco, cigarette papers, fireworks pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be

- Behaviour or changes in presentation, including changes in school attendance, which gives rise to suspicions that a child may not be receiving adequate care or may be suffering harm
- Hint or disclosure of abuse about or by a child
- Concerns that a person(s) who may pose a risk to children is living in a household with children present
- Concerns about online abuse including cybercrime, exploitation, harmful sexual behaviour, nudes and semi nudes and/or where any adult appears to be sexually communicating (e.g., email, text, written note or verbally) with a child
- Concerns about child-on-child abuse, including sexual violence and harassment
- Information which indicates that the child is living with someone who does not have parental responsibility for them (this is known as private fostering)
- Concerns that a child is at risk of domestic abuse or so-called 'honour-based' abuse, including forced marriage, marriage, or civil partnership under the age of 18, female genital mutilation (FGM), breast ironing, virginity testing or hymenoplasty
- Concerns that a child is at risk of radicalisation, child sexual exploitation or criminal exploitation, including financial exploitation and county lines; or that a child or their parent/carer may be a victim of modern slavery (trafficked)

There will also be occasions when you suspect that a child may be at risk, but you have no 'real' evidence or that the child may need support with their mental health. The child's behaviour, play and or appearance may have changed, their attendance at school may have reduced, their ability to concentrate and focus may have altered, or you may have noticed other behavioural and or physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

It is not the responsibility of the school staff to determine the truth of any disclosure or allegation; this is the responsibility of local authority children's social care. All staff however have a duty to recognise where extra support is needed or where there are complex needs or child protection concerns requiring intensive or specialist support.

Ensure you record these early concerns using MyConcern and follow the protocols in Appendix 4: Safeguarding and Child Protection Recording. If a child or adult does begin to reveal that a child is being harmed, you should follow the advice in the section *'If a child chooses to tell a member of staff about a concern or abuse'*.

Remember: If you are unsure, you should always have a discussion with the designated safeguarding lead or their deputy

If a child chooses to tell a member of staff about a concern or abuse

It takes a lot of courage for a child, parent, carer, or other significant adult to disclose that they are worried or have concerns. They may feel ashamed, the abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. It is important they are reassured that they are being taken

used, to commit an offence, or to cause personal injury to, or damage to property of; any person (including the learner).

seriously, and that they will be supported and kept safe. They should not be made to feel they are creating a problem, blamed or ashamed for making a report. Reports, particularly those about sexual violence and harassment, if possible, should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases.

If a child or adult talks to you about any risks to a child's safety or well-being you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement.

During your conversation with the child (or their parent/carer):

- Allow them to speak freely, listen to what is being said without interruption and without asking leading questions
- Keep questions to a minimum and of an open nature ('TED questions' tell me, explain, describe) i.e., 'can you tell me what happened?' rather than 'did x hit you?'
- Remain calm and do not overreact – the child (or their parent/carer) may stop talking if they feel they are upsetting you
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- Avoid admonishing the child or adult for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but they may interpret it that they have done something wrong
- Do not be afraid of silences – remember how hard this must be for the child or adult
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what do other family members think about all this
- At an appropriate time tell the child or adult that to help them you must pass the information on
- Do not automatically offer any physical touch as comfort; it may be anything but comforting to a child who has been abused
- Tell the child or adult what will happen next. The child or adult may agree to go with you to see the designated safeguarding lead. Otherwise let them know that someone will come to see or contact them before the end of the day
- Report verbally to the designated safeguarding lead
- Write up your conversation as soon as possible and hand it to the designated safeguarding lead
- Children should not be asked to write statements about abuse or any concerns that may have happened to them or sign the staff record
- Seek support if you feel distressed. This may be sometime after the disclosure

Role of the designated safeguarding lead and their deputy following identification of concerns
Whenever the designated safeguarding lead or their deputy receive information regarding concerns about a child, including via police domestic abuse notifications via Operation Encompass they will:

- Review information received and assess if any urgent actions are needed, i.e. medical, child's immediate safety
- Check what is known about the child when they arrived (or not) at school today, how they are presenting physically and emotionally and if there are any changes in their behaviour

- Consider what is already known about the child and their family, including whether any previous concerns have been raised by staff or if they are already known to local authority children's services (targeted early/family help or social care)
- Consider what 'checks' need to be carried out and how best these can be achieved
- Inform relevant school staff who have a specific need to know i.e., class/form teacher and relevant support staff
- Where appropriate use relevant national, local, and education-based risk identifying, assessment tools and guidance to support the identification of needs and decision making, such as:
    - Holly House draws on MyConcern records and chronologies, attendance information, EHC plans, individual support and risk assessments, and relevant observations from class, Family Liaison and residential teams. These inform safeguarding decisions alongside the child's communication and relevant information from families and partner agencies.
    - DDSCP multi-agency guidance, tools and briefing notes which cover a broad range of safeguarding issues, see DDSCP safeguarding children procedures and documents library
    - National guidance and assessment tools e.g. Stop it now (sexual behaviours), Contextual safeguarding tools, Sharing nudes and semi-nudes: advice for education settings working with children and young people (2024)
- Not directly approaching a child or parent/carer about an incident when the school have received a domestic abuse notification and instead make general enquiries with the child about how they are. If a child initiates a conversation about the incident the guidance outlined in the section '*If a child chooses to tell a member of staff about a concern or abuse'* will be followed
- Following the Derby and Derbyshire Safeguarding Children Procedures and using the DDSCP Threshold document to support decision making about the child's needs and the appropriate level of support and intervention. Possible options include internal support via school pastoral systems, early/family help, early help assessment and referral to statutory services such as local authority children's services
- Considering whether the matter should be discussed with the child's parents or carers or whether to do so may put the child at further risk of harm, see Notifying parents
- If unsure about the action to take, including if a child protection referral should be made, seeking advice from local authority children's social care or another appropriate agency
- If the concerns are about radicalisation or violent extremism, contacting the local authority Prevent team for advice and where appropriate making a referral to the police Prevent Team
- Where the child has complex needs or where there are child protection concerns, referring as appropriate to Local Authority Children's Services via agreed processes, providing a copy of the early help assessment, action plan and any other relevant assessments
- Notify the appropriate Local Authority Children's Services of any private fostering arrangements, to allow the local authority to check the arrangement is suitable and safe for the child. Notifications will contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and made in writing[8]
- If a child is at risk of immediate harm, and/or where it is believed a criminal offence has been committed, including sexual violence and harassment, referring to the police. See NPCC When to call the police; guidance for schools and colleges. Safeguarding

[8] See statutory guidance Children Act 1989: private fostering

considerations must take priority and include how screening, searching, and confiscating powers will be used safely, proportionately, and appropriately, including undertaking a police strip search on a child and the requirement for children to have an appropriate adult.; see Searching, screening and confiscation at school guidance (2022)

- In all cases where children are believed to be at risk of exploitation, complete and submit an Information Sharing Form for Professionals - Operation Liberty to raise concerns and share information

Notifying parents/carers
The school will normally seek to discuss any needs or concerns about a child with their parents or carers. Where an early help assessment would benefit the child and their family the most appropriate member of staff should approach the parent/carer to take this forward. In situations where there are serious needs or child protection concerns the designated safeguarding lead or deputy will contact the parent or carer. However, if the setting believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from local authority children's social care.

Pastoral/school-based support (universal and community-based support)
In all cases the school will consider what support could be offered within the setting via pastoral support processes. *Holly House's pastoral offer includes support from class and keyworker teams, Family Liaison Officer/DDSL Sarah Brent, the safeguarding team, Mental Health First Aiders and residential staff. Support is matched to the pupil's needs and reviewed with relevant staff and families. It complements, and does not replace, safeguarding referral or specialist assessment.*
Pastoral support will be kept under constant review to ensure that it is effective.
See Derby and Derbyshire Mental Health *Pathway* Guidance.

Early help support and assessment (emerging needs/additional needs – will be known as Family Help)
Where a child is likely to require co-ordinated support from more than one service to prevent escalation and improve outcomes. This is reflected in the local Family Help offer, bringing together targeted early help and, where appropriate, support that may sit alongside or inform statutory assessments and plans. The designated safeguarding lead or their deputy will support the completion of an early help assessment (EHA) and if needed, co-ordinate a team around the family (TAF). *Sarah Brent, Family Liaison Officer/DDSL, works with the safeguarding team, families and relevant services to identify needs and coordinate Early Help. Where appropriate, this includes an Early Help Assessment and Team Around the Family process. The DSL or a DDSL oversees safeguarding decisions and escalation where needs are not being met or risk increases.*

Whenever a child and their family are supported via an early help assessment, the school will keep this under constant review and should the child's situation appear not to be improving or getting worse, consideration will be given to a referral to local authority children's services.

For more information about the early help assessment process see Derby and Derbyshire Safeguarding Children; Providing early help procedure.

Intensive support
Where a child requires services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their health and development and/or are disabled they are likely to require specialist services. The designated safeguarding lead or their

deputy will refer to local authority children's services and provide a new or updated early help assessment and team around the family action plan. See Derby and Derbyshire Safeguarding Children; Making a referral to Children's Social Care procedure

Referral to local authority children's social care (specialist services)
Concerns about a child's welfare will be referred to local authority children's social care using the agreed referral process as outlined in Derby and Derbyshire Safeguarding Children; Making a referral to Children's Social Care procedure.

If at any point there is a risk of immediate serious harm to a child, an immediate referral should be made to local authority children's social care and/or if appropriate, the police

Anybody can make the referral

Where it is believed that a child is suffering or likely to suffer significant harm, a referral should be made to local authority children's social care. If the child protection concerns are urgent, the designated safeguarding lead or deputy will make a referral to local authority children's social care by phone and follow this up in 'writing' via the local authority Online Referral System. Non-urgent cases will be referred via the local authority Care Online Referral System. In Derby submission of an early help assessment, or equivalent assessment, to the weekly Vulnerable Children meeting (VCM)/ Family Help Forums (FHF) in the relevant locality can also be made.

In exceptional circumstances, such as in an emergency or a genuine concern that appropriate action hasn't been taken, any staff member can refer their concerns directly to local authority children's social care; however, they should inform the designated safeguarding lead or deputy as soon as possible.

Female genital mutilation (FGM)
If the referral is about a 'known' case of female genital mutilation (FGM), in addition to a referral to local authority children's social care, the individual teacher also has a mandatory reporting duty; see Mandatory Reporting of Female Genital Mutilation; procedural information (2015). Under this duty, 'known' cases of FGM where a girl under 18 informs the person that an act of FGM has been carried out on her, or where physical signs appear to show that an act of FGM was carried out, this must be reported to the police on 101. This is a personal responsibility in addition to the referral to local authority children's social care and the professional who identifies FGM and/or receives the disclosure should make the report by the close of the next working day.

Action following referral to local authority children's social care
The designated safeguarding lead, their deputy or other appropriate member of staff will:

- Where a referral was made by phone follow up the referral in writing using the online referral system within 48 hours and attaching any existing assessment e.g., early help assessment. In all cases the school will also include information held about any place-based risks (harm outside of the home)
- Be aware that local authority children's social care should make a decision within one working day of the referral being made about what course of action they are taking and let the school know the outcome. If the information is not forthcoming, the designated safeguarding lead or another appropriate member of staff should follow this up
- Maintain contact with the allocated social worker and support them or other agencies following any referral

- Contribute to any strategy discussion or meetings
- Support any Section 47 enquiries or statutory assessments that are carried out
- Provide a report for, attend, and contribute to any initial and review Child Protection Conference. This includes sharing any reports with parents/carers and where appropriate, the child
- Share the content of this report with the parent/carer and if appropriate the child, prior to the meeting
- Attend core group meetings for any child subject to a Child Protection plan or Child in Need meeting for any child subject to a Child in Need plan
- Whenever there are concerns about the outcome of a Child Protection Conference, use the appropriate Derby and Derbyshire Child Protection Conference Professional Dissent Process
- Where a child on a Child Protection plan, Child in Need plan or who is Looked After moves from the school or if there are unexplained absences from school, immediately inform the child's social worker/key worker in local authority children's social care
- If after the referral the child's situation does not appear to be improving the designated safeguarding lead should press for re-consideration to ensure their concerns have been addressed and the child's situation improves. See Derby and Derbyshire Multi-Agency Dispute Resolution and Escalation Policy

Information sharing[9]

The school recognises the importance of information sharing between the school and local agencies to effectively safeguard our learners. The setting operates with regard to HM Government Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024), Information Commissioner's Office Sharing information to safeguard children and young people in the education sector in the UK, Data protection in schools and DDSCP Information Sharing Guidance for Practitioners.

All staff will be mindful of the seven golden rules to sharing information (See Appendix 3) and Data Protection laws (Data Protection Act (2018), UK General Data Protection Regulation (UK GDPR) obligations and Data (Use and Access) Act (2025)). Staff are aware that the Data Protection laws do not prevent or limit the sharing of information for the purposes of keeping children safe and promoting their welfare, rather, they provide the legal framework under which information can, and in some cases, must be shared.

School staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of a child, whether this is when problems are first emerging, or where a child is already known to local authority children's social care. Professional judgement should be used to ensure the information shared is focused and proportionate.

If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy, who will seek advice from our Data Protection Officer if needed

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

[9] Following consultation specific Information sharing duty statutory guidance is expected to be published in Autumn 2026

All information sharing outside of 'business as usual', should be recorded on the appropriate logs

Staff should only discuss concerns with the designated safeguarding lead or deputy (or the most senior person on the premises if they are unavailable), headteacher or chair of governors/trustees (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Where appropriate, consent will be sought to share information. However, where there are safeguarding concerns about a child, information will be shared with the appropriate organisations such as local authority children's social care under alternative, appropriate, lawful basis[10]. In most cases concerns will be discussed with parents and carers prior to the referral taking place unless doing so would increase risk.

Details of whom the school shares information with, in what circumstances and under what lawful basis can be found in our published Privacy Notices.

Record keeping

All concerns, discussions and decisions made, including the rationale for those decisions, should be recorded in writing following the protocols in Appendix 4: Safeguarding and child protection recording. This includes instances where referrals were or were not made to another agency, such as local authority children's social care or the Prevent programme etc. If in doubt about recording requirements staff should discuss with the designated safeguarding lead or their deputy.

Records of concerns documentation, referrals and other written safeguarding information are kept in a child protection file for each child and stored separately from each child's education file; this file is 'tagged' to indicate that separate information is held. Child protection files are confidential and stored securely and only made available to relevant individuals.

Records will include:

- A clear, factual and comprehensive summary of the concern which distinguishes between observed concerns, professional opinion and historic information (see Appendix 4)
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached, the rationale for these, and the outcome, as well as a review of any progress made
- Any professional differences of opinion about the safety of a child will also be recorded; see DDSCP Multi Agency Dispute Resolution and Escalation Policy and Derby and Derbyshire Child Protection Conference Professional Dissent Process

When a child leaves the school, the designated safeguarding lead will ensure a copy of these records will be sent securely as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term) to any school or other education setting to which the child transfers and a confirmation of receipt obtained. The child protection file transfer will be separate to the main pupil file. This will allow the new provider to continue supporting the child and have the support in place for when the child arrives.

[10] See Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers, Why data protection legislation does not prevent information sharing, pages 9 -11

When child protection files are transferred, the school will include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs.
The designated safeguarding lead will also consider if it would be appropriate to share any information with the new education provider in advance of the child leaving e.g. children who have or who have had a social worker and those receiving support through the Channel programme.

Where the school considers that safeguarding information is unclear or incomplete, the DSL will seek clarification where necessary to support effective safeguarding.

The designated safeguarding lead, their deputy/ies and key staff such as special education needs co-ordinators will be informed when a child's safeguarding/child protection file is received.

Holly House uses MyConcern to record and securely store pupil safeguarding concerns, decisions, actions and chronology across education and residential provision. Related first-hand notes and supporting documents are retained securely and incorporated into the safeguarding record as appropriate. Access is restricted according to safeguarding responsibilities. Records are managed in conjunction with Appendix 4 and the school's Record Retention Policy.

Support for those involved in a safeguarding/child protection issue
Child neglect, abuse and exploitation are devastating for children and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- Taking all suspicions and disclosures seriously
- Nominating a link person who will keep all parties informed and be the central point of contact
- Nominating a 'case manager' where a member of staff is the subject of an allegation made by a child
- Responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- Storing records securely
- Offering details of helplines, counselling, or other avenues of external support
- Following the procedures laid down in our whistleblowing, complaints, and disciplinary procedures
- Co-operating fully with relevant statutory agencies
- *Staff who need support following a safeguarding concern should speak confidentially with the DSL, a DDSL or their line manager. Support may also be sought from Sarah Brent or Cheryl Gray as trained Mental Health First Aiders. Information about the child or concern must remain restricted to those who need to know.*

Section 7: Child-on-child abuse, including sexual harassment and violence

All staff working in or on behalf of the school maintain an attitude of *'it could happen here'* – this is especially important when considering child-on-child abuse. Even if there are no reports it does not mean it is not happening.

If staff have any concerns regarding child-on-child abuse, they should speak to the designated safeguarding lead or their deputy

The school recognises that children may abuse their peers physically, sexually, and emotionally. There is a zero-tolerance approach to child-on-child abuse; abuse is abuse and this will not be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up' as this can lead to a culture of unacceptable behaviours, misogyny and an unsafe environment for children.

The setting will take child-on-child abuse as seriously as abuse perpetrated by an adult and address it through the same processes as any safeguarding issue. We will respond to all reports and concerns, including those that have happened outside of the school and / or online. In addition, we also recognise that children who abuse others and any other child affected by child-on-child abuse are also likely to have considerable welfare and safeguarding issues themselves.

What is child-on-child abuse?

- Keeping Children Safe in Education (2026) defines child-on-child abuse as most likely to include but not limited to:
    - Bullying (including cyberbullying, prejudice based and discriminatory bullying)
    - Abuse within intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
    - Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and /or encourages physical abuse)
    - Serious physical assault and harm, or the threat of harm with a weapon
    - Harmful sexual behaviour, sexual violence, such as rape or penetration including with an object and sexual assault (this may include an online element which facilitates, threatens and /or encourages sexual violence)
    - Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may include misogyny/misandry, be standalone or part of a broader pattern of abuse
    - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
    - Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated by AI
    - Upskirting[11], which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm

[11] The Voyeurism (Offences) Act (2019) – upskirting is a criminal offence and anyone of any gender can be a victim

    - Initiating/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- It can also include causing someone to engage in extremist or radicalising behaviour
- Child-on-child abuse exists on a continuum and different forms of abuse may overlap
- It can affect any child/young person of any age and sex and can occur between two children or through a group of children abusing a single child or group of children
- Sometimes vulnerable children are targeted. For example:
    - Those living with domestic abuse or with intra-familial abuse in their histories
    - Young people in care
    - Those who have experienced bereavement through the loss of a parent, sibling, or friend
    - Black and minority ethnic children are under identified as victims but are over identified as perpetrators
    - There is recognition it is more likely that girls will be victims and boys are likely to be perpetrators. However, both girls and boys can experience child-on-child abuse, but they are likely to experience it differently e.g., girls being sexually touched/assaulted or boys being subject to homophobic taunts/initiation/hazing (rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group)
    - Evidence also shows that children with disabilities, and lesbian, gay, bisexual, or gender questioning children are at greater risk
- It is influenced by the nature of the environments in which children/young people spend their time - home, school, peer group, online and community - and is built upon notions of power and consent. Power imbalances related to gender, social status within a group, intellectual ability, economic wealth, social marginalisation etc, can all be used to exert power over a peer
- Child-on-child abuse involves someone who abuses a 'vulnerability' or power imbalance to harm another and has the opportunity or is in an environment where this is possible
- While perpetrators of child-on-child abuse pose a risk to others, they are often victims of abuse themselves

Preventing child-on-child abuse

All staff know that child-on-child abuse is preventable and know that timely, evidence-based support can be key to preventing children from going on to commit harm, abuse or violence. There is a whole school approach to preventing child-on-child abuse, including child-on-child sexual violence and sexual harassment; this forms part of the whole school approach to safeguarding. The school will seek to minimise the risk of child-on-child abuse by ensuring an approach that prepares learners for life in modern Britain. The establishment has a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life.

The school provides a safe environment, is alert to when children might be at highest risk around the school day, promotes a culture of positive standards of behaviour, takes steps to address inappropriate behaviour, has effective systems in place where children can confidently raise concerns knowing they will be taken seriously and provides safeguarding through the curriculum via relationships education/relationships and sex education, online safety, and other curriculum opportunities. This may include targeted work with children identified as vulnerable or being at

risk and developing risk assessment and targeted work with those identified as being a potential risk to others.

All staff understand the importance of challenging inappropriate behaviours between peers that are abusive in nature. We recognise the escalatory nature of misogyny and downplaying certain behaviours will not be tolerated or passed off. Staff will maintain an attitude of '*it could happen here'* and all inappropriate behaviour will be addressed.

The setting deals with a wide continuum of children's behaviour on a day-to-day basis and most cases will be dealt with via school-based processes. These are outlined in the following policies:

- Holly House School behaviour policy, including bullying/ online bullying and prejudice-based bullying and school screening, searching, and confiscating powers and how they will be used safely, and appropriately, including police strip searches
- Online safety policy and other associated issues, including making or sharing nudes and semi-nudes and extremist material
- Attendance policy
- Relationships education/ relationships and sex education

Systems for children to report abuse

Even if there are no reports, all staff understand it does not mean it is not happening; it may be the case that it is not being reported. We recognise that children may not find it easy to tell staff about the abuse, that certain children may have additional barriers to telling someone and children can show signs or act in ways they hope adults will notice or react to. In some cases, victims may make indirect reports via a friend or staff may overhear conversations. All staff recognise the indicators and signs of child-on-child abuse and know how to identify it.

See page 24 *Systems for children to report concerns and abuse* for information about the systems in place for children to confidently report abuse.

If staff have any concerns regarding child-on-child abuse, which may have taken place on or off-site, they should speak to the designated safeguarding lead or deputy

Action on concerns

Child-on-child abuse may be a one-off serious incident or an accumulation of incidents. Staff may be able to easily identify some behaviour/s as abusive however in some circumstances it may be less clear. Reports of sexual violence and harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. In all cases the initial response to a report is very important. Members of staff will take the concerns seriously and reassure the child that they will be supported and kept safe, regardless of how long it has taken them to come forward. If possible, reports should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases. The victim will not be given the impression they are creating a problem or made to feel ashamed for making a report or their experience minimised. Abuse which has occurred online or outside of the school will be treated just as seriously as that which has occurred within the education environment.

Staff must follow *Section 6. Responding to concerns about a child's welfare* and discuss the concerns and seek advice from the designated safeguarding lead.

When an allegation is made by a pupil/student against another pupil/student, members of staff should consider if the issues raised indicate that the child and/or alleged perpetrator may have low level, emerging needs, complex/serious needs, or child protection concerns and follow the process outlined in Section 6. Responding to concerns about a child's welfare.

Considerations for cases where child-on-child abuse is a factor include:

- What are the wishes of victims in terms of how they want to proceed?
- What is the nature, extent and context of the behaviour including verbal, physical, sexual (including making or sharing of nudes/semi-nudes) and/or online abuse? Was there coercion, physical aggression, bullying, bribery or attempts to ensure secrecy? What was the time, location, duration, and frequency? Is the incident a one off or a sustained pattern of abuse? (Remember there may be other forms of abuse in addition to what has been reported) Were other children and /or adults involved? Has a crime been committed and/or have any harmfully sexual behaviours been displayed?
- What is the child's age, development, capacity to understand and make decisions (including anything that might have had an impact on this e.g., coercion), and family and social circumstances? What is the nature of the relationship between the children involved? Are they in a current or previous intimate personal relationship, do they live in the same household or setting, attend the same school, classes, or transport?
- What are the relative chronological and developmental ages of the children? Does the victim or perpetrator have a disability or learning difficulty? Are there are any differentials in power, social standing, or authority?
- Is the behaviour age appropriate or not? Does it involve inappropriate sexual knowledge or motivation?
- Are there any risks to the child victim or alleged perpetrator themselves and others e.g., other children in school, adult students, school staff, in the child's household (particularly siblings or other children related to the household), extended family, peer group or wider social network? Are there any links to child sexual exploitation, child criminal exploitation or gang related activity?

Immediate consideration should be given to how best to support and protect the victim and alleged perpetrator and any other children involved/impacted. Where the report involves rape or penetration including with an object, the alleged perpetrator must be removed from any classes they share with the victim. There must also be careful consideration on how best to keep the victim and alleged perpetrator apart on school premises (including any before or after school activities) and on transport to and from the setting.

For all other reports of sexual violence and sexual harassment and forms of child-on-child abuse, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, school premises and transport should be considered immediately.

All decisions will be made in the best interests of the children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator. In all cases, the initial report should be carefully evaluated on a case-by-case basis with the designated safeguarding lead taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. The designated safeguarding lead will refer to relevant assessment tools and guidance as appropriate such as:

- Keeping Children Safe in Education (2026) part five

- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Searching, screening and confiscation at school
- Behaviour in schools
- School suspensions and permanent exclusion
- Stop it Now Sexual Behaviours Traffic Light Tool
- DDSCP Thresholds Document
- DDSCP Safeguarding Children Procedures, in particular Children who present a risk of harm to others and Safeguarding children from online harms procedures
- When to call the police – guidance for schools and colleges

When appropriate the designated safeguarding lead may seek further advice from local or national safeguarding contacts as outlined in Section 4: Key safeguarding contacts.

Whenever there is an allegation of abuse, including concerns about sexual harassment and violence, made against a child, the designated safeguarding lead and other appropriate staff will draw together separate risk and needs assessments and action plans to support the victim and the alleged perpetrator. These will consider:

- The victim, especially their protection and support
- Whether there have been other victims
- The alleged perpetrator/s
- All the other children (and if appropriate adult students and staff) at the school, especially any actions that are needed to protect them from the perpetrator/s, or from future harms
- The time and location of the incident and any action required to make the location safer
- When information can be disclosed to staff and others, including the alleged perpetrator and parents/carers

Whenever local authority children's social care and/or the police are involved, the school will work in collaboration to ensure the best possible support and protection is provided for both the victim and the alleged perpetrator.

All reports of child-on-child abuse (including sexual harassment and/or sexual violence) will be recorded in the child's safeguarding/child protection file. This will include all decision making, risk and needs assessment and plans recorded in writing as outlined in Section 6.

Where appropriate incidents may be managed internally (universal and community based support), via early help (emerging/additional needs – which will be known as Family Help) or through local authority children's social care (via intensive and specialist services which incudes child protection concerns); reports to the police will be run in parallel with children's social care as outlined in the Derby and Derbyshire multi-agency safeguarding procedures, in particular Children who Present a Risk of Harm to Others and Safeguarding children from online harms procedures.

All risk and needs assessment and action plans whether internal or multi-agency will be reviewed and updated on a regular basis. If things do not improve or deteriorate the situation should be reconsidered.

The school uses the Contextual Safeguarding School Beyond Referrals Self-Assessment Toolkit & Guidance to self-assess our response to harmful sexual behaviour. All relevant policies will be

updated to reflect the lessons learnt and consideration given to the wider cultural issues within the school that enabled the behaviour to occur.

Where the victim or alleged perpetrator transfers to another education setting, the designated safeguarding lead will ensure the new provider will be made aware of any on-going support needs (and will discuss this with the victim and where appropriate their parents, as to the most suitable way of doing this) as well as transferring the safeguarding/child protection file. In the case of the alleged perpetrator, where appropriate, this will also include potential risks to other children and staff. See Section 6. Responding to concerns about a child's welfare - record keeping.

Any suspicion or allegations that a child has been sexually abused or is likely to sexually abuse another child (or adult) or where there are concerns about any other form of abuse, a referral must be made immediately to local authority children's social care and where appropriate, the police

Section 8: Safer recruitment and selection of staff

The school uses best practice and has adopted robust recruitment procedures as outlined in Keeping Children Safe in Education (2026) to deter and prevent people who are not suitable to work with children from applying, securing employment or volunteering opportunities in the school. We apply all appropriate measures for our staff, including volunteers, agency, and third-party staff (supply staff) trainees/student teachers, governors/trustees, and contractors. This forms a vital part of the whole school approach to safeguarding and is an essential part of creating a safe environment for our learners.

Those involved with the recruitment and employment of our staff have received appropriate safer recruitment training and at least one person who conducts an interview has completed safer recruitment training.

Safer practice in recruitment means thinking about and including issues to do with child protection and safeguarding children at every stage of the process from advertising, job descriptions/person specifications, application forms, shortlisting, employment history and references, selection, and pre-appointment vetting checks.

Everyone who works in the school, including volunteers and school governors will have appropriate Disclosure and Barring (DBS) and teacher status, teacher, and teacher prohibition checks or where appropriate GTCE sanctions and restrictions. Governors/trustees/proprietors will also require section 128 checks. *All schools providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work with children aged 5 and under or in wraparound care for children up to aged 8 e.g. breakfast clubs and after school care, or are directly concerned with the management of such provisions, are not disqualified under Childcare Disqualification Regulations 2018, see Statutory Guidance Disqualification under the Childcare Act 2006*

Other checks that may be necessary for staff, volunteers, and others:

- **Individuals who have lived or worked outside the UK** – will undergo the same checks as all other staff in the school and further checks deemed appropriate to ensure suitability
- **Agency and third-party staff (supply staff)** - the school will obtain written notification from any agency or third-party organisation provider that they have carried out checks on an individual who will be working at the school that we would otherwise perform.
- **Contractors** - where the school uses contactors to provide services the contact will set out their safeguarding requirements.
- **Trainee/ student teachers** – applicants salaried by the school will undergo all necessary checks by the school. The initial teacher training provider will carry out necessary checks on fee funded trainee teachers and will provide written confirmation that these have been carried out and judged suitable to work with children.

  Volunteers - will undergo all necessary checks by the school and if they are in a role that involves teaching, training, instructing or supervising children frequently or on more than 3 days in a 30-day period or overnight the school will obtain an enhanced DBS check with children's barred list information.

The school maintains a single central record of pre-appointment checks consistent with Keeping Children Safe in Education (2026).

See the school recruitment and selection policy/disclosure and barring (DBS) policy and supervision of volunteer's statement.

Visitors
The school premises provide a safe learning environment with secure access. We recognise there are different types of visitors, those in a professional capacity, children's relatives or others visiting for school activities or visitors via a third party and have processes in place to ensure they are suitable, are checked and monitored as appropriate.

We recognise the importance of allowing access for local authority children's social care to conduct, or to consider whether to conduct an assessment and that staff from other partner agencies may need to visit to see a child or young person to either safeguard or promote their welfare. For visitors who are there in a professional capacity, the school will check ID and be assured that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks).

External speakers/visitors
The school may ask external speakers or visitors to work with children or provide assemblies on subjects such as online safety, relationships/relationships and sex education and health education. On these occasions we refer to the Effective Working Together Guidance: Supporting Schools to Deliver the PSHE Programme guidance. The school will undertake an assessment of the educational value, the age appropriateness of what is going to be delivered and whether relevant checks will be required, and an assessment made of what will be appropriate supervision. There will also be an agreement made in advance of the session/s on how a safeguarding report should be dealt with by an external visitor. See school policy/agreement for visiting speakers.

Alternative provision
The school continues to be responsible for the safeguarding any learner placed with an alternative provision provider. Learners in alternative provision often have complex needs and are vulnerable to additional risk of harm. We will ensure that the provider meets the needs of the learner.

The school obtains written confirmation from the provider that:

- Appropriate safeguarding checks have been carried out on their staff and individuals working for the provider; and
- The provider will inform the school of any arrangements that may put the child at risk i.e., staff changes, so the school can ensure that appropriate safeguarding checks have been carried out on new staff.

The school has arrangements in place to ensure attendance is monitored and that there are effective safeguarding arrangements within the provision. *Marcus Walker oversees Holly House's alternative provision arrangements, working with the DSL on safeguarding concerns and relevant staff on attendance, support and placement review.* Arrangements include always knowing where a child is based during school hours, the address of the provider, any satellite sites and subcontracted provision a learner may attend .

Alternative provision placements are regularly reviewed to provide assurance that the learner is regularly attending, and the placement continues to be safe and meets the child's needs. *Placements will be reviewed at least half-termly, and sooner where attendance, safeguarding or*

suitability concerns arise. Whenever safeguarding concerns arise, placements are immediately reviewed and terminated, if necessary, unless or until concerns have been satisfactorily addressed.

Use of school premises for non-school activities

Our school safeguarding arrangements will apply to all activities provided by the school under the direct supervision of school staff. Where activities are provided by another body, the governing body will seek assurance that the provider has appropriate safeguarding/child protection policies and procedures in place, as outlined in the Keeping children safe in out-of-school settings guidance. This includes arrangements to liaise with the school where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll/attend the school. Safeguarding requirements are included in all lease/hire agreements.

Section 9: What staff should do if they have a safeguarding concern or an allegation about another member of staff or concerns about safeguarding practices within the school

As part of our whole school approach to safeguarding there are processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. Our culture and environment support all of our staff to discuss matters that concern them in the workplace and, where appropriate, outside the workplace (including online) which may have implications for the welfare and safety of children.

All concerns and or allegations about adults working in or on behalf of the school (including supply teachers, trainee teachers, contractors, and volunteers) will be reported, recorded, and dealt with promptly and appropriately.

This includes whenever the school receives an allegation relating to an incident that happened when an individual or organisation was using their school promises for the purposes of running activities for children.

By doing so everyone in the school will:

- Create and embed a culture of openness, trust, and transparency
- Help to identify concerning, problematic, or inappropriate behaviour at an early stage
- Minimise risk of abuse
- Ensure that school staff are clear about professional boundaries and act within these, in accordance with the ethos and value of the school

The school recognise there are two levels of allegation/concern

1. Allegations that **may** meet the harms threshold
2. Allegations/concerns that **do not** meet the harms threshold, also known as 'low level concerns'

Our response to concerns/allegations is consistent with the DDSCP Safeguarding Children Allegations against Staff, Carers and Volunteers procedure.

1. Allegations that may meet the harms threshold

This is where an allegation might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school. Where it is alleged that anyone working in the establishment, including supply teachers, contractors and volunteers has:

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

This includes any behaviour that may have happened outside school and is known as transferable risk.

If you have concerns about another staff member

Staff who are concerned about the conduct of a colleague (including supply staff, contractors, and volunteers) must remember that the welfare of the child is paramount.

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff then this should be reported without delay to the headteacher/principal, who will consider whether an onward referral to the LADO is required. Where there are concerns/allegations about the headteacher/principal this should be referred to the chair of governors/chair of the management committee/proprietor. In a situation where there is a conflict of interest in reporting the matter to the headteacher/principal this should be reported directly to the Local Authority Designated Officer (LADO). The member of staff should make a record which will include time, date, place of incident, persons present, what was witnessed, what was said etc; this should then be signed and dated. *At Holly House, concerns about an adult's conduct must be reported without delay to Headteacher Marc Hughes. A factual, dated record must be provided securely to him. Where the concern is about the Headteacher, it must be reported directly to Chair of Governors Phil Pierce. Where internal reporting creates a conflict of interest, staff may contact the Derbyshire LADO directly using the details in Section 4. Appendix 1 remains available as an example recording form.*

Looking after the welfare of the child
Where a child has been harmed, or there is an immediate risk of harm to a child or if the situation is an emergency, local authority children's social care should be contacted and where appropriate the police. It is the designated safeguarding lead's responsibility to ensure the child is not at risk and refer cases of suspected abuse to children's social care.

For further information about how concerns which may meet the harms threshold will be investigated, recorded, and managed, including non-recent allegations by a child and referrals to the Local Authority Designated Officer (LADO) see *Holly House School* staff behaviour (code of conduct) policy, which incorporates low-level concerns, managing allegations against staff and whistleblowing.

2. Concerns that do not meet the harm threshold
Allegation/concerns that do not meet the harms threshold are referred to as 'low-level concerns". A low-level concern does not mean it is insignificant, rather that the behaviour towards the child does not meet the harm threshold as outlined above.

A low- level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is:

- Inconsistent with the staff behaviour (code of conduct) policy, including inappropriate conduct outside of work, or
- Does not meet the harm threshold or is not serious enough to consider a referral to the Local Authority Designated Officer (LADO)

The behaviour can exist on a wide spectrum. Further information about distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour can be found in the school staff behaviour (code of conduct) policy.

Staff should share low-level concerns in confidence with Headteacher Marc Hughes or DSL Robin Rhodes. Where a concern is shared with the DSL, it is passed promptly to the Headteacher, who

remains the decision-maker. Concerns are recorded through the restricted-access MyConcern staff-safeguarding arrangements.

Low-level concerns about the Headteacher should be reported confidentially to Chair of Governors Phil Pierce. Staff may ask the school office to arrange confidential contact with the Chair without disclosing the substance of the concern to the person who is its subject. Direct LADO access remains available where appropriate.

Staff are also encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or on reflection they believe they have behaved in a way that they consider falls below the expected professional standards.

The headteacher/principal will be the decision maker in respect of all low-level concerns; however, this may be undertaken in collaboration with the designated safeguarding lead.

Reports about supply staff or contractors will be notified to their employers.

All low-level concerns will be recorded in writing to include details of the concern, the context and the action taken. For further information about the procedure for recording and responding to low-level concerns see school staff behaviour (code of conduct) policy.

Concerns about safeguarding practices within school
All staff are encouraged to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. These concerns will be taken seriously by the senior leadership team.

For information about how to raise concerns with the senior leadership team or other channels see staff behaviour (code of conduct) policy, which incorporates the whistleblowing routes available to staff.

Appendix 1	Example concerns form

Education settings must ensure that volunteers, staff, and governors are able to record concerns about:

- The welfare of a child or young person; and
- The behaviour of a volunteer, member of staff, trainee teacher, governor or person connected with the school

The following headings illustrate the minimum information that should be included in the local arrangements that is agreed within the individual education setting.

Principles
A statement should be included on the form used in the setting that confirms:

"Any member of the staff, including volunteers, must record any concerns about a child or young person. This form must be completed as soon as possible after the discovery of the concern. If the concern is about:

- *The welfare of a child, it must be sent to the designated safeguarding lead*
- *The behaviour of any member of staff, it must be sent immediately to the headteacher, or the chair of governors/management committee or equivalent if the allegation is against the headteacher/principal or where the headteacher/principal is the sole proprietor of an independent school the allegations should be reported directly to the Local Authority Designated Officer (LADO).*

If the concerns are immediate, please inform an appropriate person straight away."

Concerns about a child or young person

Child's full name:		**Date of birth:**	
		Class/year/form:	
Concern identified by:		**Role:**	
Date of concern:		**Time of concern:**	
Witness/es:		**Place of incident:**	
Name of alleged person (s) responsible for the harm/potential harm:			
Not known		**Volunteer**	
Learner in this school		**Member of staff**	
Learner in another school please specify		**Governor/trustee**	
Family member		**Other, please specify**	

Concern/Incident/Disclosure: Why are you concerned about this child? What have you observed and when? What have you been told and when?

Please provide a description of any incident/s or anything you see or have been told by a child, or another person. Record any visible injuries or ask the child/young person to point to where else it is sore/hurts. Do not remove or lift clothing for the purpose of the examination unless the injury site is freely available because of treatment or take photos of injuries. If photos of injuries are required for evidence purposes, then this should be done by the police. Remember to make clear what is fact and what is hearsay/opinion. Note the language and terminology used by the child, or adult, and be clear about who has said what. Continue on a separate sheet if necessary.

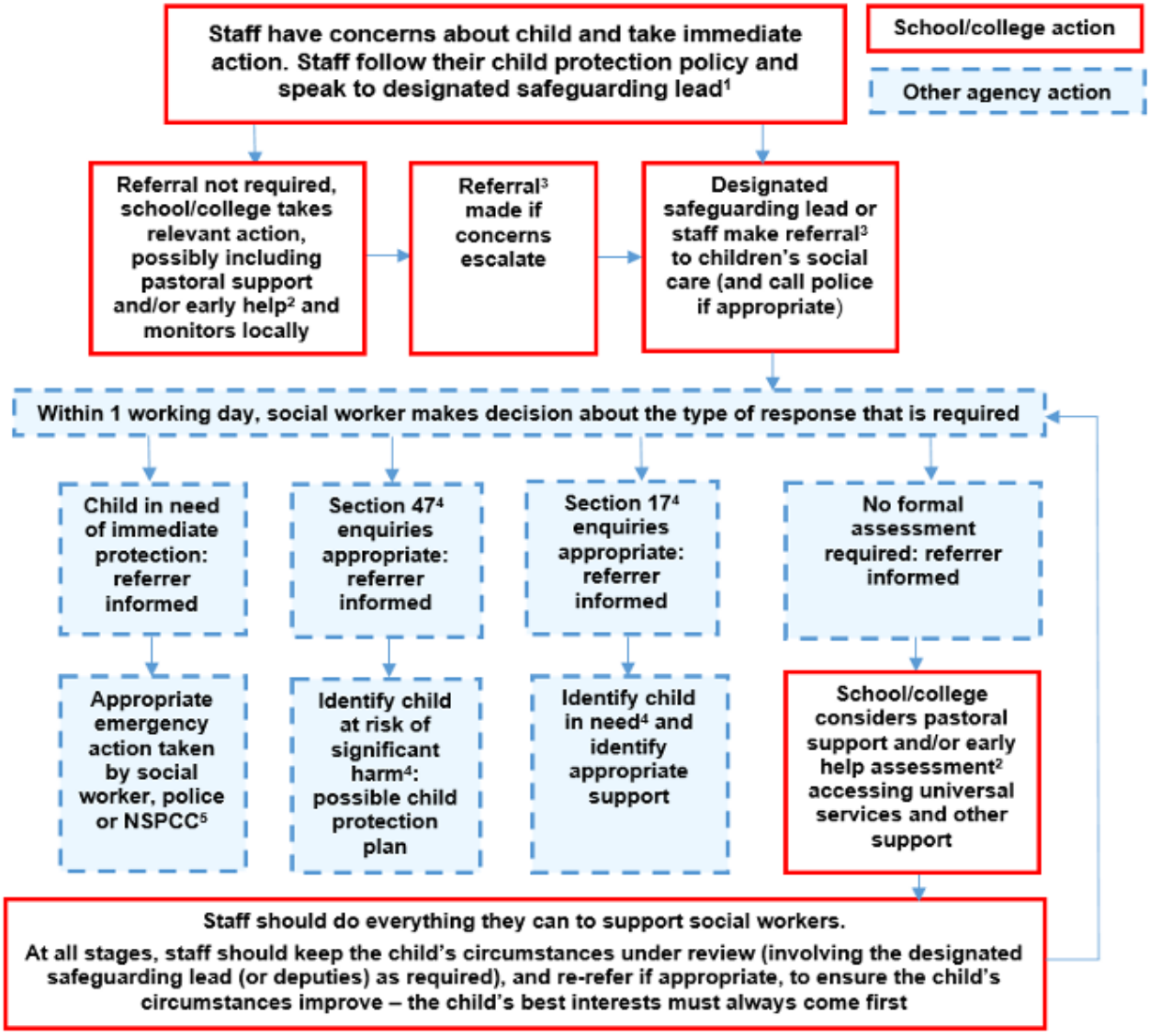
Has any action already been taken in relation to this concern? For example, child taken out of class, first aid

Name of person concerns reported to	**Date**

Action to be taken / recommendations from designated safeguarding lead

Name of person completing form	**Signature**	**Date and time**

Appendix 2	Safeguarding flowchart



[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

[2] Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.

[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.

[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Working Together to Safeguard Children.

[5] This could include applying for an Emergency Protection Order (EPO).

Taken from Keeping Children Safe in Education for information only (2026), page 27

Appendix 3 The seven golden rules to sharing information (including personal information)

1. **All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.** The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework[12] to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

2. **When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child[13] and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.** You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

3. **You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** You need a lawful basis[14] to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm[15], consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

4. **Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer[16]), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.

5. **When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**

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[12] Where processing or sharing personal data, you must follow the Information Commissioner's Code of Practice for Data Sharing which should be read alongside the ICO's guide to GDPR

[13] Engagement with a child where it is appropriate to based on their level of assessed competency. See NSPCC Learning Gillick competence and Fraser guidelines

[14] A guide to lawful basis

[15] See Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (2024) page 9 for further advice on appropriate lawful basis or use the IOC Lawful basis interactive guidance tool

[16] Data Protection Officers, IOC

6. **Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.** Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

7. **Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

   Taken from Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (2024) HM Government

Information-sharing advice

The Derbyshire Education Data Hub advise schools ensure there is a good working relationship between DSL and Data Protection Officer (DPO). Work together to determine when information should be shared, how and under what lawful basis. Ensure all decisions are properly recorded and do not attempt to redact information without the support and advice of your Data Protection Officer (even if your safeguarding recording software offers this functionality).

Appendix 4 Safeguarding and child protection recording

This appendix has been developed and published for schools by the Derbyshire Data Protection Hub.

Introduction

The Independent Inquiry into Child Sexual Abuse (IICSA) found that proper creation, maintenance and long-term retention of records is an important part of supporting victims of Child Sexual Abuse (CSA) and bringing perpetrators to justice. This is because victims and survivors may take decades to come to terms with what has happened to them and potentially to decide to take action to report a crime.

The IICSA Inquiry recommended that records relating to CSA should be retained for 75 years. It also recommended that the UK government directs the Information Commissioner's Office (ICO) to introduce a Code of Practice on retention of and access to records known to relate to child sexual abuse. The Inquiry report stated that such a code should set out that institutions should have:

- retention policies that reflect the importance of such records to victims and survivors, and that they may take decades to seek to access such records;
- clear and accessible procedures for victims and survivors of child sexual abuse to access such records;
- policies, procedures and training for staff responding to requests to ensure that they recognise the long-term impact of child sexual abuse and engage with the applicant with empathy.

A Code of Practice has not yet been published, but Holly House School is committed to ensuring practices at the school are reflective of IICSA recommendations.

Statement of Intent

Holly House School is aware that creation, maintenance and retention of child protection, safeguarding and CSA records must be carried out with the understanding that access to records may be required many decades after records are created.
This document should be read in conjunction with the school's / Trust's Record Retention Policy.

How to record safeguarding/child protection concerns.
Given these very long retention periods, Holly House School will ensure that safeguarding, child protection and CSA records are written in such a way as to be intelligible in the future and without any additional knowledge of the school, its staff, pupils or systems. Staff will be trained in good practice.

Our records will:

- Be written by the school's Designated Safeguarding Lead (DSL), Deputy (DDSL) or other suitably trained staff
- Identify the author by name and role
- Make clear it where the person who is recording the information is not the person who has seen or heard the issue, and identify all relevant parties by name and role

- Use full names (not initials) of staff, other adults and parents/family members (full name in this context means first and surname)
- Ensure staff roles / job titles are included
- Ensure family relationships are clear
- Use full name (not initials) of child whose record this is
- Use full name (not initials) of any other child involved and ensure a mirror record is on their file, if appropriate
- Not use initials when recording names
- Where individuals have the same or similar names, ensure there is a distinguishing factor, eg middle name, job title, DoB etc
- Ensure all spelling, punctuation and grammar is correct.
- Use appropriate language to describe events, not slang, shorthand, local terminology or asterixis.
- Ensure quotes are properly identified as such and attributed to their owner
- Be objective and avoid opinion. If opinion is necessary, ensure it is identified as such and attributed to its owner.

How records are stored
Holly House School use MyConcern to record and store child protection and safeguarding records.

This method was risk assessed in conjunction with our Data Protection Officer using a Data Protection Impact Assessment to determine the nature, scope and context of the data processing. This is subject to regular review.

We inform our pupils, families and staff that we process their personal data for this purpose via our Privacy Notices which are published on the school website.

Any related physical first-hand notes will be accurately transcribed into *MyConcern* and include the following statement: "This is an accurate transcription of notes taken at (insert date & time)". Diagrams will be scanned in. Any recordings will be also be securely retained.

The transfer of pupil safeguarding records
Keeping Children Safe in Education states that "where children leave the school, the designated safeguarding lead should ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file."

When a child leaves Holly House School, all pupil records, including safeguarding, child protection and CSA records must be transferred in a secure manner, to the child's new school. The legal basis and time scale for this can be found in The Education (Pupil Information) (England) Regulations 2005, parental consent is not required.

All copies of data held by the school that the child has departed will then be deleted or retained in line with the retention policy, including all paper records and data stored electronically. A record could be kept for tracking and auditing purposes only.

Schools may retain some minimal 'skeleton' data about pupils' admission, departure and next destination (where known) in order to respond to any requests for information about these pupils and for the school's historical archive. Where we intend to create and maintain these records, this will be noted on the retention policy. In some instances, we may have a legitimate interest in retaining a copy of more detailed pupil records for a longer time period. If we do retain pupil records, we will justify this retention and document the reasons for doing so, and will carry out a Data Protection Impact Assessment where required.

Responsibility for maintaining the pupil record, including retaining records relating to Child Protection, Safeguarding and CSA passes to the 'last known school'.

The school is the final or last known school if:

- secondary phase and the pupil left at 16 years old or for post-16 or independent education, or;
- at any point the pupil left for elective home education, they are missing from education, or have left the UK, or have died.

Tertiary colleges are not included in this definition, therefore the school will retain the record. However, the college must receive a copy of the child protection file, as per the requirements of KCSiE above.

Retention of Records relating to Staff

Holly House School retains staff records in line with the school Record Retention Policy. Where staff records pertain to CSA they will be retained for up to 75 years, subject to review, as set out in the Policy.

As stated above regarding the long-term retention of minimal pupil records, we may wish to retain very basic 'skeleton' records about staff that have worked in the school/trust beyond the normal retention of the whole personnel/HR file. This information may include the staff name, role, contract start and end dates and evidence of Single Central Record checks. This may be useful when we need to respond to requests for information from/regarding staff, in the event of it being needed for litigation or other legal purpose and as part of our historical archive. If we intend to create and maintain these records, this will be noted on the retention policy.

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