REPTON
ABU DHABI

Student Protection Policy

August 2026

Part 1: Safeguarding Policy

1.1 Safeguarding commitment and principles

Safeguarding commitment

In Repton Abu Dhabi, we are committed to promoting the welfare of each child. It is our responsibility to ensure that all children have equal rights to be protected from harm and abuse and the right to feel safe. We create and maintain a safe, supportive and inclusive environment where each child may thrive and develop physically, socially, emotionally and academically.

Safeguarding principles

1. Everyone has a responsibility to support the protection of children.

2. Educate all staff in understanding the categories of abuse and the consequent duty of care they hold to notice any potential harm to children.

3. Empower all staff to act in the best interests of the child to protect them from harm or abuse and take appropriate actions if any concerns arise.

4. Know our children well and offer timely support to those who have experienced, or are at risk of experiencing, an adverse childhood experience.

5. Empower all children to be able to voice their opinion and to share their thoughts and beliefs within the safe environment of the school.

6. Educate and raise awareness in children of how to manage risk, identify harmful behaviours and seek help when needed.

7. Ensure that every adult who works with or for the school is safe to do so.

1.2 Scope – who the policy applies to

This policy and the processes within apply to all children and adults in the school at Rose and Fry campuses.

This policy applies to all teaching, non-teaching, pastoral, support, contract staff, volunteers, non-school based Cognita staff and any other adults working at the school. It also applies to all children in the school, including when being educated off-site and undertaking an educational visit.

1.3. Definitions

Definition of safeguarding

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment

- preventing impairment of children's physical and/or mental health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- taking action to enable all children to have the best outcomes.

Definition of child protection

Child protection is defined as:

Protecting individual children identified as suffering or likely to suffer significant harm. Child protection is part of the safeguarding process.

Definition of child and children

Children includes everyone 18 and under or those over the age of 18 who remain in full-time education.

1.4 Legal and contextual considerations

Our safeguarding and child protection policies, processes and knowledge base are built upon and support the 1989 international legal framework - the United Nations Convention on the Rights of the Child.

Specific legal and local context

The policy is in line with Federal Law No. 3 of 2016 regarding the Child Rights Law (Wadeema's Law), Cabinet Resolution No 52 of 2018 regarding the implementing regulation of Wadeema's Law, the guidance provided in the Ministry Of Education (MOE) 'National Child Protection Policy in Educational Institutions in United Arab Emirates', and the ADEK Safeguarding and Child Protection Policies.

Safeguarding key contacts

School contacts	
Designated Safeguarding Lead (DSL/CPC)	Aya Salem – Rose & Fry Aya.salem@reptonabudhabi.org
Deputy Designated Safeguarding Lead (Deputy DSL)	Aran Smith - Fry Aran.smith@reptonabudhabi.org Deanne Gupta – Rose Deanne.gupta@reptonabudhabi.org
Any other staff trained to DSL level	Tracy Crowder-Cloe Stephen Davis Jon Hughes Dean Williams Lisa Watson Marie Al Nasrawi Lizzie Hilliard Helen Scott Graeme Wallace Roisin Stack Lea Arbes Seenamol Mathew Jon Hunt
Assistant Head- Pastoral	Jon Hunt
Principal	Tracy Crowder-Cloe Tracy.crowder@reptonabudhabi.org

Cognita contacts	
Regional Safeguarding Lead	Kirsty Clarke Kirsty.clarke@cognita.com
Regional Director of Education	Ian Wallace Ian.wallace@cognita.com
Group Chief Education Officer	Dr Simon Camby simon.camby@cognita.com

Local Child Protection Services / Government contacts	
Our school follows the safeguarding protocols and procedures of:	The Child Protection Unit at ADEK Phone: 80085 Email: cpu@moe.gov.ae
Local child protection services referral team(s)	Family Care Authority Hotline: 800444 Email: info@adfca.gov.ae

Police	
Local police emergency	999

Location of safeguarding and child protection documents in school	
List the documents – from statutory/ external agencies and school documents	Repton Abu Dhabi Student Protection Policy – CPOMS and School's Website Cognita Safeguarding Policy – CPOMS, reception/staffroom, and School's Website Safeguarding Policy: Student Version – Teams and Staffroom Behavior Policy – Teams and School's Website Anti-Bullying Policy – Teams and School's Website Intimate Care Policy – Teams Child Abduction Policy – Teams Attendance Policy – Teams and School's Website Whistleblowing Policy – CPOMS

Part 2: Safeguarding Processes

2.1 Accountability and Responsibilities

A. Specific staff accountabilities and responsibilities

All staff have the following responsibilities:

- Contribute to providing a safe environment in which all children can learn and flourish.
- Know what constitutes abuse and what to do if a child tells them that he or she is being abused, harmed or neglected.
- Know what to do if they are concerned about the behaviour or conduct of an adult in the school.
- Manage the requirement to maintain an appropriate level of confidentiality.
- Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSL (DDSL) or in their absence the Regional Safeguarding Lead (RSL)
- Refer any safeguarding concern about the Principal to the Regional Chief Executive Officer.
- Be aware of the child protection process and their role in it.
- Read and understand this policy including all key factual awareness documents.

The **Designated Safeguarding Lead (DSL)/Child Protection Coordinator (CPC)** is the key person in school responsible for leading and managing the safeguarding of children. They must have the authority in school to make key decisions.

The **Principal** is accountable for the standards of safeguarding and child protection at their school.

The **Regional Safeguarding Lead (RSL)** is responsible for promoting the highest standard of safeguarding and child protection within a region, advising and supporting schools to adopt a self-improving approach to safeguarding practice.

The **Regional Human Resources Director (HRD**) promotes (in relation to safeguarding) the highest standard of safer recruitment practice within a region.

The **Regional Chief Executive Officer (Regional CEO)** is accountable for the standards of safeguarding in their region. The Regional CEO is responsible for overseeing safeguarding arrangements within their region, including the effective implementation of policies and practices across all Cognita schools in their region.

B. The role of the DSL

The DSL should:

- ensure that the school's safeguarding and child protection policies are known, understood and used appropriately
- ensure that the school's Safeguarding and Child Protection Policy is reviewed annually and that the procedures and implementation are updated and reviewed regularly
- help promote educational outcomes by sharing necessary information about the welfare, safeguarding and child protection issues that children are experiencing, or have experienced, with teachers and school leadership staff. The DSL's role could include ensuring that their staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- manage referrals to the child protection unit at ADEK or the Family Care Authority as needed.

C. Availability of the DSL

During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst the DSL (or deputy) will normally be available in person, the Principal will define what 'available' means and whether in exceptional circumstances availability is via Phone or Zoom. It is the responsibility of the Principal and DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

2.2 Recording and reporting a concern about a child

A. Importance of reporting

All concerns about a child must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL).

If a child is in immediate danger/risk of harm, a referral should be made to the police immediately. This referral would be made by the DSL, in consultation with the Principal. The school must always inform the Regional Safeguarding Lead (RSL).

B. Managing a disclosure

The points below support all adults in a situation where a child tells a member of staff that they know about or have been a victim of abuse or neglect.

- Listen carefully and allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me." Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing."
- Questioning of the child about what they are saying should not be extensive as the DSL will lead any investigation. Limit questioning to the minimum necessary for clarification using *What, When, How and Where*. Avoid leading questions such as, "Has this happened to your siblings?" Do *not* use questions beginning with *Why* as this can apportion feelings of guilt within a child.
- If the child discloses abuse, then it is appropriate to ask whether any other adults were present and observed the abuse and whether the abuse has happened before.
- At an appropriate time, tell the child that the matter will be referred in confidence.
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.

C. Confidentiality

Staff should never guarantee confidentiality to children or adults wishing to tell them about something serious as this may not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told to ensure their safety.

Staff who become aware of a safeguarding issue within the scope of this policy should only ever report to the appropriate person as specified in this policy. Issues should not be discussed with anyone else internally (including the person or persons against whom the allegations have been made) or externally including, but not limited to, the media.

D. Photos of abuse

If a child discloses physical abuse, self-harm or attempts to take their life, staff should never take photos of their injuries.

E. Recording a disclosure or a concern that you have about a child

How and where to record

All concerns and/or disclosures must be recorded on CPOMS within 24 hours. Staff receive annual training on how to report concerns on CPOMS. The training is shared with staff on Teams and CPOMS for their future reference.

Parents, visitors, volunteers, contractors, and external providers can also report any safeguarding concerns by completing the concerns forms (including the student concern form, self-report/low-level concern form, and allegation form) available at the school reception.

F. Referral Pathways in Abu Dhabi

For maltreatment concerns which occurred outside of the supervision of the school, the DSL/CPC, or the deputy DSL if the DSL/CPC is not present, should then fill the Safety Concern Form online on the digital safety concern portal.

The Safety Concern Form will automatically be shared with the ADEK CPU, the FCA and the MoI CPC. FCA will review the case and follow the required procedures for case management.

For maltreatment concerns which occurred under the supervision of the school, the DSL/CPC should then complete the Safety Concern Form on the digital safety concern portal. Once submitted, a copy of the Safety Concern Form will then be automatically shared with the FCA, the ADEK CPU and the MoI CPC. The ADEK CPU will review the information first before referring to the FCA for case management, who will take the necessary procedures for follow-up on the cases after receiving the report.

It is important to note that the ADEK CPU reserves the right to conduct or to designate qualified institutional personnel to conduct the initial safety and risk assessment before reporting the concern to the FCA.

If the ADEK CPU refers the concern to the FCA, the concern would then be managed by the CPS at the FCA. The ADEK CPU should still provide administrative support (e.g., sharing relevant information) to enable the FCA to conduct the needed assessments and other activities related to case management.

If the ADEK CPU does not report the case to the FCA, the concern is returned to the school with the justification, and the school is asked to collect additional information before submitting another Safety Concern Form.

In all situations, the ADEK CPU would ensure that the concern gets logged and responded to.



1. After submitting the Safety Concern Form on the digital safety concern portal, a copy of the report is automatically shared with FCA, ADEK CPU, and MoI CPC.
2. For cases occurring within educational institutions' supervision, the ADEK CPU will review the information first before referring to the FCA for case management. Note: The ADEK CPU will take the necessary procedures to follow-up on the cases after receiving the report.

Relevant contact details are as follows:

• Abu Dhabi Police: 999

• Family Care Authority (FCA): 800444 icm@adfca.gov.ae

• MoE Child Protection Unit (CPU)*: 80085 cpu@moe.gov.ae

• Safety Concern Portal: https://daasafetyconcern.abudhabi/

2.3 Reporting and recording concerns about an adult

A. Expectations of adults

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff. Their prompt communication to the DSL, DDSL or Principal of any concerns, no matter how small, regarding the conduct by an adult which causes them to doubt that adult's suitability to work with or have access to children is paramount.

All references in this section to "adult" should be interpreted as meaning any adult, staff members, agency/supply staff, self-employed, contractors, volunteers and visitors, unless otherwise stated. The school is conscious of its duty of care to children and will always act. This includes the possibility of abuse arising from situations or persons outside the school setting if alerted to this.

The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves, is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported. Adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct.'

Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and

a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. All members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. A position of trust could arise even if the member of staff does not teach the child.

B. Low-Level Concerns, including self-reports

What is a low-level concern, including those that are self-reports?

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is not in line with the code of conduct.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low- Level Concerns about an adult

From time to time, an individual may notice behaviour, statements or actions in others which leave them concerned. These are behaviours or actions which fall short of a formal allegation of abuse.

These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

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

- being over friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating behaviour (including shouting or being verbally aggressive); and/or
- offensive language (including the belittling of children on their own or in front of peers).

What to do if you have a low-level concern?

Where a low-level concern exists, it should be reported to the DSL on StaffSafe within 24 hours. Such report will be treated confidentiality to the extent possible and only disclosed, whether internally or externally, on a need to know basis.

Self-reporting

From time to time, an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued.

Equally, an individual may, for whatever reason, have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct/other Cognita policy, falls below the expected professional standards or breaches this policy. Self-reporting in these circumstances is encouraged. This demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.

As such, the school sees self-reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

What to do if you have a self-report?

Where a self-report exists, it should be reported to the DSL on StaffSafe within 24 hours. Such report will be treated confidentiality to the extent possible and only disclosed, whether internally or externally, on a need to know basis.

C. Allegations

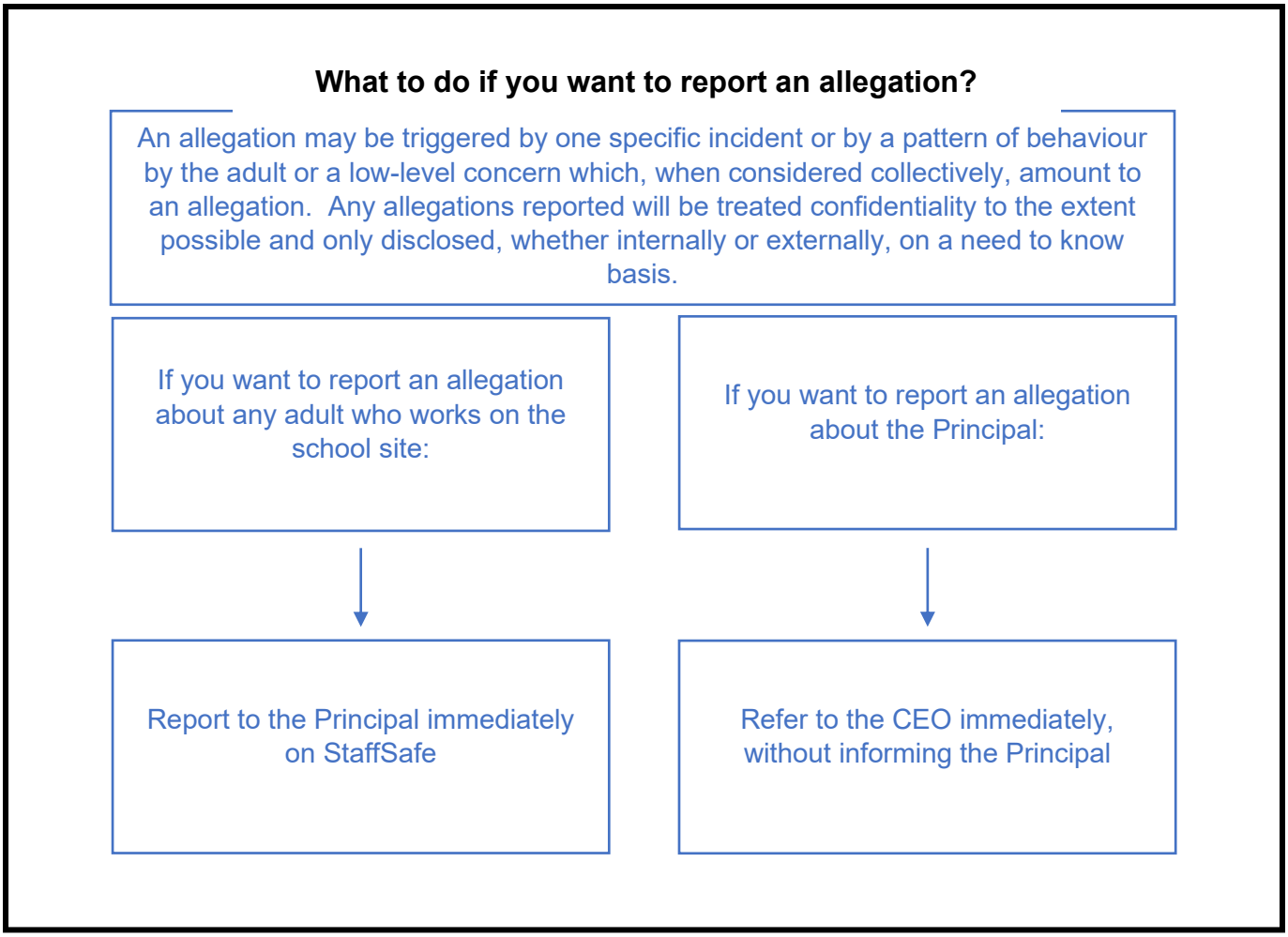
What is an allegation?

Allegations represent situations that might indicate a person may/would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position or in any capacity.

This policy applies to all adults in the school if it is alleged that they have:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she 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 (potential transferable risk).

An allegation may be triggered by one specific incident or by a pattern of behaviour by the adult or a low-level concern which, when considered collectively, amount to an allegation.



D. Whistleblowing

You should use the whistleblowing policy when you suspect wrongdoing.

Wrongdoing may include:

- actions which endanger the Health and Safety of others or the environment
- concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils
- conduct which suggests extremism or radicalisation of other staff or pupils
- allegations against adults
- bribery or corruption
- criminal activity
- fraud or other financial irregularities
- failure to comply with any legal or professional obligation or regulatory requirements
- conduct likely to damage the reputation of the School/Cognita
- misuse of sensitive or confidential information
- miscarriages of justice
- breaches of our internal policies and procedures
- any activity or situation within the School/Cognita or anywhere in our supply chain which amounts to modern slavery and
- deliberate attempts to conceal any of the above.

If you have any concerns about wrongdoing, you should contact the Whistleblowing Officer (please refer to the whistleblowing policy for details).

Staff are strongly encouraged to reach out at an early stage.

No member of staff will be disciplined or otherwise suffer any detriment from their employer or Cognita for raising a genuine concern about unsafe practice, if they do so in good faith and follow the whistleblowing procedures.

2.4 Training

A. Training

All staff employed in school should receive annual safeguarding and child protection training from the DSL, at the commencement of the academic year.

All staff and parents will also receive safeguarding and child protection updates/training, including online safety training, regularly throughout the year. This is provided by the DSL. This will ensure that all staff have the relevant skills and knowledge to safeguard children effectively. Topics covered may include information related to knowledge base documents. Principals and those in senior roles must complete advanced safeguarding and subsequent refresher training. All staff actively involved in the recruitment process must complete safer recruitment training and subsequent refresher training.

Volunteers and external providers complete safeguarding training before starting their work at school. Senior students also receive a safeguarding training prior to engaging in any activities or mentoring roles with junior students.

B. Induction

At the point of induction, all new employed staff, including those with governance oversight, must be trained by the DSL or DDSL. This includes an expectation to read and understand:

- The Safeguarding and Student Protection Policy and Procedure
- UAE Code of Conduct
- Whistleblowing policy
- Health and Safety policy

At the point of induction, new staff must be informed of the names and role of the Designated Safeguarding Lead and Deputy DSLs. Likewise, all agency/supply/substitute staff must be informed of those with these roles, and of the school processes for raising concerns about children or adults in the school. All new staff must be made aware of, if applicable, the acceptable use policy which includes the use of personal mobile phones when on the school site. Staff and visitors are required to wear an identity lanyard.

2.5 Curriculum

A. Curriculum provision to keep children safe

The school is committed to proactively teaching children about safeguarding, including online safety, as part of our approach to offering a broad, balanced and inclusive curriculum. Through ongoing work with the children, we aim to build resilience so that every child knows that speaking up about any concern is valued and actively promoted. This includes raising a concern about themselves or about another.

The safeguarding curriculum is taught across the school; 8 billion ideas in Senior School, PSHE in Junior School, and Digital Safety across the school.

B. Children raising concerns

We actively promote the view that children should feel able to raise any concerns that they may have. This includes when they have a concern about a friend or peer. Children are made aware that they can report their concerns to a member of the safeguarding team or scan a QR code to fill out a concerns report. A poster of the safeguarding team is posted in every classroom across the school.

Part 3: Knowledge Base

3.1 Types and signs of abuse – Physical, emotional, sexual, domestic and neglect

A. What is abuse?

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may need help or protection. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of children who may be in need of help or protection.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

B. Physical abuse

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

Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- respiratory problems from drowning, suffocation, or poisoning
- untreated or inadequately treated injuries
- bruising which looks like hand or finger marks or caused by an implement
- cigarette burns, human bites
- scarring, scalds, and burns.

C. Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs of emotional abuse tend to be behavioural rather than physical (see below).

D. Domestic abuse

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic violence and abuse may be a single incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or sexual abuse regardless of gender or sexuality. The abuse can encompass but is not limited to psychological, physical, sexual, financial or emotional. Exposure to domestic abuse and/or violence can have a serious, detrimental and long-term impact on a child's health, wellbeing, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

E. Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Signs of sexual abuse displayed by children may include:

- sexually transmitted infection/diseases
- pain/itching/bleeding/bruising
- urinary infections
- difficulty walking, sitting or standing
- persistent sore throats
- stomach-ache
- behavioural signs set out in section G below.

F. Neglect

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

Signs of possible neglect include the child being:

- underweight or is small for their age, or their weight deteriorates
- very overweight for their age
- poorly clothed, with inadequate protection from the weather
- often absent from school for no apparent reason; or persistently arrive late
- regularly left alone, or in charge of younger brothers or sisters.

G. Behavioural signs of abuse and neglect manifested by children

'All behaviour is communication.'

If a child is being abused, their behaviour may change in several ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children
- become angry or disinterested and/or show little creativity
- seem frightened of certain adults
- become sad, withdrawn, or depressed
- have trouble sleeping
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children
- refuse to participate in physical activities
- develop eating disorders
- self-harm and/or express suicidal ideation
- refuse to attend school or run away from home
- lack confidence or have low self-esteem
- use drugs or alcohol as a coping strategy.

Signs of abuse or neglect manifested by the parents or other responsible adult

Signs may include:

- places unrealistic expectations on the child, i.e., demands a level of academic or physical performance of which they are not capable
- offers conflicting or unconvincing explanation of any injuries to the child
- delays seeking medical treatment for the child's mental/physical health
- appears indifferent to, is emotionally unavailable, or overtly rejects, the child
- denies existence of or blames the child for the child's behaviours at home or at school
- sees and describes the child as entirely worthless, burdensome or in another negative light.
- refuses offers of support to meet the child's need
- refuses to consent to referrals to external agencies to meet their child's needs/does not engage as expected.

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

3.2 Mental Health

A. Adverse childhood experiences

Adverse children experiences are stressful events that occur in childhood, such as being a victim of abuse, neglect or growing up in a household in which alcohol or substance misuse, mental ill health, domestic violence or criminal behaviour are present.

This can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that all staff are aware of how these children's experiences can impact on their mental health, behaviour and education. All staff should also be aware that deteriorating emotional wellbeing and escalation of mental health problems can, in some cases, be an indicator that there is a safeguarding concern, for example, a child has suffered or is at risk of suffering abuse, neglect, bullying/cyberbullying or exploitation.

Please note, however, that only appropriately trained health professionals should attempt to make a diagnosis of a mental health problem.

Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern. Immediate action should be taken - talk to the DSL.

B. Mental health support

Our children are supported by specialist staff and resources to proactively support their mental health and wellbeing. Mental health first aiders and the social worker are available to offer crisis, and short- and long-term support to children. Access to support is via the referral systems in place in the school.

However, as stated above, it is the responsibility of all adults to recognise when a child show signs of distress or presents with mental health concerns which needs the intervention of the DSL.

Schools will seek therapeutic support for the most vulnerable and adopt, when appropriate, a multi-agency approach to the care of the child.

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

3.3 Vulnerable children

A. Vulnerable children

Whilst all children should be protected, it is important that staff recognise that some groups of children are potentially at greater risk of harm (including online harm). For example, this vulnerable group includes, but is not limited to those children with additional learning needs and/or disabilities, young carers, those in guardianship, and those living in homes characterised by domestic abuse and/or parental acrimony.

B. Additional learning needs and/or disabilities

Children with additional educational needs (ALN) and/or disabilities are statistically more vulnerable to child abuse, including child-on-child abuse. Additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- that children with ALN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these challenges.

What should I do if I suspect that a child may be being at risk?

Report your concern to the DSL without delay.

3.4 Child-on-child abuse

A. Child-on-child abuse

All staff should be alert to the risk of child-on-child abuse and understand their role in preventing, identifying and responding to it. All staff should understand that even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. Staff should know that children can abuse their peers and other children, and that abuse can occur in intimate personal relationships between peers and other children. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh' and should not develop high thresholds before acting. Abuse is abuse and child-on-child abuse must be taken as seriously as abuse by an adult.

B. What is child-on child-abuse?

Child-on-child abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms, including, but not limited to:

- serious bullying (including cyber-bullying) (please refer to the anti-bullying policy for more details)
- relationship abuse
- domestic violence
- child sexual exploitation
- youth and serious youth violence
- 'upskirting'
- gender-based violence
- causing someone to engage in sexual activity without consent
- sexual violence
- sexual harassment (including sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse)
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (previously known as sexting or youth produced sexual imagery).

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. Staff should be aware that there may be multiple perpetrators and/or victims and not consider that only one child abuses another in isolation.

Sharing nudes/semi nudes via imagery/videos can, but does not always, constitute abusive behaviour. All incidents should be responded to in accordance with this policy.

C. When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse. This could be low-level bullying or cyber bullying (where the school's Anti-Bullying Policy should be followed) or age-appropriate sexual experimentation within the norms of sexual development.

Factors which may indicate that behaviour is abusive include

a) where it is repeated over time and/or where the perpetrator(s) intended to cause serious harm
b) where there is an element of coercion or pre-planning
c) where there is an imbalance of power, for example, because of age, size, social status or wealth.

This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL, who in turn should seek guidance from the Regional Safeguarding Lead.

D. How can I identify victims of child-on-child abuse?

Identifying child on child abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child(ren) may be suffering from child-on-child abuse overlap with those relating to other types of abuse.

Signs can include:

- failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard you would ordinarily expect
- physical injuries
- having difficulties with their mental health and/or emotional wellbeing
- becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much
- drugs and/or alcohol use

- changes in appearance and/or starting to act in a way that is not appropriate for the child's age including sexualised behaviours

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

E. Are some children particularly vulnerable to abusing or being abused by another child?

Any child can be affected by child-on-child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

- Child-on-child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.
- Children who are particularly vulnerable to abuse or to abusing others include those who have:
    a) witnessed or experienced abuse or violence themselves
    b) suffered from the loss of a close family member or friend or
    c) experienced considerable disruption in their lives.
- Children with SEN/D are particularly vulnerable to both abuse and child-on-child abuse, often in the form of bullying (both direct and online).

F. What should I do if I suspect either that a child(ren) may be being abused, or that a child(ren) may be abusing others?

If a member of staff thinks for whatever reason that a child(ren) may be at risk of abuse from another child or young person, or a group of perpetrators, or that a child(ren) may be abusing others, the member of staff should report their concern verbally to the DSL without delay in accordance with this policy, recording their concern after this. If a child(ren), whether they are the alleged victim or perpetrator is in immediate danger, or at risk of harm, the DSL will take appropriate action immediately. This may include reporting to child protection services or the police. Both perpetrators and victims should have a referral.

G. How does the school raise awareness of, and reduce the risk, of child-on-child abuse?

Staff are trained on the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify and respond to it. The school actively seeks to prevent all forms of child-on-child abuse by educating children and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child-on-child abuse and any cases of bullying or cyber-bullying promptly and appropriately. Children are educated about the nature and prevalence of child-on-child abuse. They are informed of what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of bullying and child-on-child abuse, including sexual violence and sexual harassment.

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

3.5 Online Safety

A. Online safety

Technology often provides the platform that may facilitate harm. All staff should be aware of the unique risks associated with online safety and that technology is a significant component in many safeguarding and wellbeing issues. DSLs should be aware of online safety in their school and should, along with the specialist digital learning staff in the school, raise awareness in the staff group, including but not limited to, cyber-bullying and child sexual exploitation.

B. Areas of risk

There are four primary areas of risk:

1 **Content**: being exposed to illegal, inappropriate or harmful material.
2 **Contact**: being subjected to harmful online interaction with other users.
3 **Conduct**: personal online behaviour that increases the likelihood of (or causes) harm; for example, the making, sending and receiving of explicit images, or online bullying.
4 **Commercial**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, those with governance oversight of the school will be doing all that they can to limit children's exposure to the above risks from the school's IT system. As part of this process, the school has appropriate filters and monitoring systems in place and regularly reviews their effectiveness. Whilst it is essential that schools ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught regarding online teaching and safeguarding.

The school will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. All staff should understand their role in preventing, identifying and responding to harm caused by its use.

The school will use parental communications to reinforce the importance of children being safe online. Parents may be supported to understand what systems the school uses to filter and monitor online use. The school will update parents regularly about what their children are being asked to do online in school. The School will always work with parents to support them to address their child's online activity as needed.

What should I do if I suspect that a child may be at risk?

Report your concern to the DSL without delay.

Last Review Date: September 2026

Next Review Date: September 2027