Running Deer School Safeguarding Policy

Reviewed: 13/7/26 Next date for review: 01/09/2027

Designated Safeguarding Leads:

Nick Hurst (Proprietor) Adam Baxter (Intervention and Family Services) Geraldine Carter (School)

Status & Review Cycle: Statutory | Annual

Safeguarding Statement

Running Deer School and Intervention and Family Services recognise our moral and statutory responsibility to safeguard and promote the welfare of all children and young people. We endeavour to provide a safe and welcoming environment where children and young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children and young people receive effective support, protection and justice. Child protection forms part of Running Deer's safeguarding responsibilities.

Elements of the policy also work in conjunction with UNICEF rights relevant to all children:

The following **rights are of equal importance** to every child. **Every child has the right to:**

- **Relax** and **play** (Article 31)
- Freedom of **expression** (Article 13)
- **Be safe** from violence (Article 19)
- An **education** (Article 28)
- Protection of **identity** (Article 8)
- **Sufficient** standard of **living** (Article 27)
- **Know** their **rights** (Article 42)
- Health and **health services** (Article 24)

Key Personnel

- The Designated Safeguarding Lead (DSL) for the Proprietor is: **Nick Hurst**.
    - Email: Nicholas.hurst@runningdeer.org.uk
- The Deputy Designated Safeguarding Lead (DDSL) for the Proprietor is: **Jo Winterburn**.
    - Email: Jo.winterburn@rdcic.org.uk
- The Designated Safeguarding Lead (DSL) for **Running Deer School** is **Geraldine Carter**, Head of School who is responsible for the day-to-day safeguarding of the school.
    - Email: Geraldine.carter@runningdeer.org.uk | Telephone 01647 400201.
- The Deputy Designated safeguarding lead's (DDSL) for **Running Deer School** are:
    - **Claire Kennard**: Email: claire.kennard@runningdeer.org.uk
    - **Sarah Mclintock:** Email: sarah.mclintock@runningdeer.org.uk
- The Designated Safeguarding Lead (DSL) for the **Intervention and Family Services** is **Adam Baxter**:
    - Email: adam.baxter@runningdeer.org.uk
- The Deputy Designated Safeguarding Lead (DDSL) for the **Intervention and Family Services** is **Rachael Knight**.
    - Email: rachael.knight@runningdeer.org.uk
- The Online Safety Lead (DDSL) for the **Intervention and Family Services** is **Lee**
    - Email: as.lee@runningdeer.org.uk
- The filtering and monitoring lead is **Chris Hales**
    - Email: Christian.hales@runningdeer.org.uk

DSL coverage

Setting	Monday			Tuesday			Wednesday			Thursday			Friday		
School	GC	SM	CK	GC	CK		GC	SM	CK	GC	SM	CK	GC	SM	CK
Interventions	AB	RK		AB	RK		AB	RK		AB	RK		AB	RK	
CIC wide	NH	JW		NH	JW		NH	JW		NH	JW		NH	JW	

Terminology

Safeguarding and promoting the welfare of children and young people is defined for the purposes of this guidance 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 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
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

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.

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

Introduction

Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 175 of the Education Act 2002 (maintained schools only).
- Section 157 of the Education Act 2002 (Independent schools only, including academies and CTCs)
- The Education (Independent Schools Standards) (England) Regulations 2003 (Independent schools only, including academies and CTCs).
- The Safeguarding Vulnerable Groups Act, 2006.
- The Crime and Policing Act 2026
- The Teacher Standards, 2012.
- Working Together to Safeguarding Children, 2026.
- Keeping Children Safe in Education (KCSIE), 2026.

- Information Sharing: Guidance for Practitioners and Professionals, 2018.
- What to do if you're worried a child is being abused, 2015.

Policy Principles

The welfare of the child is paramount

- All children and young people regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- We recognise that all adults, including temporary staff, volunteers and Board of Directors, have a full and active part to play in protecting our children and young people from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- All staff believe that our school and Intervention Services should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- Children, young people and staff involved in child protection issues will receive appropriate support and supervision.
- Children and young people may not be ready to disclose abuse because they may be embarrassed, scared or there may be a language barrier etc, but this should not prevent staff from exercising a professional curiosity, seeking further information and speaking to the DSL. This may, in some cases, give the DSL a fuller picture of the situation which can be vital.
- Children and young people may require early help, in accordance with the guidance in Working Together 2026 and this will be available to staff to consider.
- Staff, governors and trustees to use the DfE Data Protection Guidance for Schools to understand data protection.

Policy Aims

- Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the setting. All staff, but especially the Designated Safeguarding Lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

- To demonstrate Running Deer's commitment with regard to safeguarding and child protection to children and young people, parents and carers, and other partners.
- To support the child's development in ways that will foster security, confidence and independence.
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all staff of the need to safeguard children and young people and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school and Intervention Services, contribute to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the setting which will be followed by all members in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Front Door (MASH).
- To ensure that all staff working within our school, who have substantial access to children, have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and a single central record is kept for audit.
- To ensure that all volunteers who frequently teach, train, instruct or supervise children receive enhanced DBS checks with children's barred list information, as they are in regulated activity under The Crime and Policing Act 2026.

Linked polices

This policy cannot be viewed in isolation and must be seen in line with the below polices:

- Child In Care and Young Carers Policy
- Lost Or Missing Child Policy
- Transition Policy (this sets out procedures about information sharing re. transition into and out of IFS)
- Whistleblowing policy
- Mobile phone Policy
- Online internet safety policy

Values

Supporting Children and Young People

- We recognise that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- We recognise that Running Deer's settings may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Running Deer School and Intervention Services will support all children and young people by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school and Intervention Services.
- Recognising that hand holding, fist bumps, high fives and hugs as a greeting are acceptable forms of physical contact between children and young people.
- Responding sympathetically to any requests for time out to deal with distress and anxiety.
- Offering details of helplines, counselling or other avenues of external support.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children and young people.
- Notifying Front Door (MASH) as soon as there is a significant concern.
- Providing continuing support to a child or young person, about whom there have been concerns, who leaves the school/setting by ensuring that appropriate information is copied under confidential cover to their new setting and ensuring that medical records are forwarded as a matter of priority.
- Children are taught to understand and manage risk through our person, social, health and economic (PHSE) education and Relationship and Sex Education and through all aspects of their time at Running Deer. This includes online safety.

Prevention / Protection

We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The Running Deer community will therefore:

- Work to establish and maintain an ethos where children and young people feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with children (e.g. through safety questionnaires, participation in anti-bullying week), asking children and young people to report whether they have had happy/sad lunchtimes/ playtimes.
- Ensure that all children know there is an adult in the setting who they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, opportunities which equip children and young people with the skills they need to stay safe from harm and to know to whom they should turn for help. This will include anti-bullying work, online-safety, road safety and, if applicable, cycle training.
- Ensure all staff are aware of Running Deer guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
- We ensure all CPOMS records are checked by two Level 3 Safeguarding trained members of staff.

Safe Setting, Safe Staff

We will ensure that:

- **All staff and volunteers read KCSIE Part 1 (2026) in full annually and sign to say they read and understood it.** There is no longer a condensed version - all staff must read Part 1 in its entirety.
- All staff receive information about the school and/or Intervention Services' safeguarding arrangements, the school and/or Intervention Services' safeguarding statement, staff behaviour policy (code of conduct), child protection policy, behaviour policy, the safeguarding response to children who go missing from education, the role and names of the Designated Safeguarding Lead and their deputy, and sign to say they have read it.
- School governors will have safeguarding training, including online safety, at induction.

- All staff receive safeguarding and child protection training, including online safety, at induction in line with advice from Devon Children and Families Partnership which is regularly updated (for example, via email, e-bulletins and staff meetings), as required, but at least annually.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns.
- All staff and Board of Directors have regular Level 2 child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The child safeguarding policy is made available via the school's and Intervention Services' websites, and parents and carers are made aware of this policy and their entitlement to have a copy. All parents and carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Safeguarding Policy.
- Running Deer provides a coordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans.
- Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.
- Community users organising activities for children are aware of the school's Safeguarding Policy, guidelines and procedures.
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy, are clearly advertised in the school and Interventions Services settings with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- All Directors will be given a copy of Part 2 of Keeping Children Safe in Education (KCSIE) 2026.

Roles and Responsibilities

Board of Directors

All members of The Board of Directors understand and fulfil their responsibilities, namely, to ensure that:

- There is a Safeguarding policy together with a staff behaviour policy (code of conduct).

- Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with Devon Children and Families Partnership and statutory requirements, are reviewed annually and that the Safeguarding policy is publicly available on the school's and Intervention Services' websites.
- All staff, including temporary staff and volunteers, are provided with the Safeguarding policy and staff Code of Conduct.
- All staff have read Keeping Children Safe in Education (KCSiE) 2026 Part 1 in full and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- Running Deer operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
- Running Deer has procedures for dealing with allegations of abuse against staff (including the Head of School), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.
- A member of the Board of Directors is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Head of School.
- A member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) by the Board of Directors who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- On appointment, the DSL and deputy undertake appropriate identified training offered by DCFP or other provider every two years.
- All other staff have safeguarding training updated as appropriate.
- At least one member of the school's governing body has completed safer recruitment training to be repeated every five years.
- Children and young people are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal social and health education (PSHE).
- Appropriate safeguarding responses are in place for children and young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse

and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

- Appropriate online filtering and monitoring systems are in place and are reviewed at least once every academic year by the SLT member responsible for filtering and monitoring (Chris Hales), supported by the DSL and IT staff.
- Enhanced DBS checks (without barred list checks, unless the Director is also a volunteer at the school) are in place for all Directors.
- Any weaknesses in Child Protection are remedied immediately.

The Head of School and the Centre Manager (Intervention Services) will ensure that:

- The Safeguarding Policy and procedures are implemented and followed by all staff.
- Sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy DSL to carry out their roles effectively, including the assessment of children and young people and attendance at strategy discussions and other necessary meetings.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Systems are in place for children and young people to express their views and give feedback which operate with the best interest of the child or young person at heart.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- That children and young people are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- They liaise with the Local Authority Designated Officer (LADO), before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer.
- Anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

The Designated Safeguarding Lead

- Holds ultimate responsibility for safeguarding and child protection in the school or Intervention Services and is a member of the SLT.

- Acts as a source of support and expertise in carrying out safeguarding duties for the whole setting's community.
- Encourages a culture of listening to children and young people and taking account of their wishes and feelings.
- Is appropriately trained with updates at least every two years and will refresh their knowledge and skills at regular intervals but at least annually.
- Will refer a child or young person, if there are concerns about possible abuse, to Front Door (MASH) and act as a focal point for staff to discuss concerns. Enquiries must be followed up in writing, if referred by telephone.
- Will keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child even if there is no need to make an immediate referral.
- Will ensure that all such records are kept confidential, stored securely and are separate from student records, until the child's 25th birthday.
- Will ensure that an indication of the existence of the additional file is marked on the child or young person's records.
- Will ensure that when a child or young person leaves the school or service, relevant child protection information is passed to the new setting (separately from their main file) as soon as possible, ensuring secure transit and that confirmation of receipt is obtained.
- In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new setting in advance of a child or young person leaving. For example, information that would allow the new setting to continue supporting victims of abuse and have that support in place for when the child or young person arrives.
- Will liaise with the Local Authority and work with other agencies and professionals in line with Working Together to Safeguard Children.
- Has a working knowledge of DCFP procedures.
- Will ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required which has been shared with the parents or carers.
- Will ensure that any child or young person currently with a child protection plan who is absent from the educational setting without explanation is referred to their social worker.
- Will ensure that all staff sign to say they have read, understood and agree to work within Running Deer's safeguarding policy, behaviour policy, staff Code of conduct and Keeping

Children Safe in Education (KCSIE) 2026 Part 1 in full and ensure that the policies are used appropriately.

- Will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all staff, keep a record of attendance and address any absences.
- Will contribute to and provide, with the Head of School and Board of Directors, the "Audit of Statutory Duties and Associated Responsibilities" (S175/157 audit) to be submitted annually to the Education Safeguarding Team working on behalf of Devon County Council.
- Has an understanding of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate.
- Will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputy are clearly advertised in the setting, with a statement explaining the setting's role in referring and monitoring cases of suspected abuse.

The Deputy Designated Safeguarding Lead

- Is trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.
- Designated Safeguarding Leads from all areas of the organisation will aim to meet weekly to discuss safeguarding concerns and scrutinise actions. This will be recorded in the monitoring logs.

All Staff

- Understand that it is everyone's responsibility to safeguard and promote the welfare of children and young people and that they have a role to play in identifying concerns, sharing information and taking prompt action.
- Consider, at all times, what is in the best interests of the child or young person.
- Know how to respond to a child or young person who discloses abuse through delivery of 'Working Together to Safeguard Children', and 'What to do if you're worried a child is being abused'.
- Will refer any safeguarding or child protection concerns to the DSL or, if necessary, where the child is at immediate risk, to the police or Front Door (MASH).

- Are aware of the Early Help process and understand their role within it including identifying emerging problems for children and young people who may benefit from an offer of Early Help, liaising with the DSL in the first instance and supporting other agencies and professionals in an early help assessment through information sharing. In some cases, staff may act as the Lead Professional in Early Help Cases.
- Will provide a safe environment in which children can learn.

Confidentiality

- Running Deer recognises that in order to effectively meet a child or young person's needs, safeguard their welfare and protect them from harm, Running Deer must contribute to inter-agency working in line with Working Together to Safeguard Children (2026) and share information between professionals and agencies where there are concerns.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 are not barriers to sharing information where the failure to do so would place a child or young person at risk of harm.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- However, we also recognise that all matters relating to child protection are personal to children, young people and families. Therefore, in this respect they are confidential, and the Head of School, Centre Manager, or DSLs will only disclose information about a child or young person to other members of staff on a need-to-know basis.
- We will always undertake to share our intention to refer a child to Front Door (MASH) with their parents or carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will contact the Front Door (MASH) consultation line.

Child Protection Procedures

- Abuse and neglect are forms of maltreatment of a child or young person. Somebody may abuse or neglect a child or young person by inflicting harm or by failing to act to prevent harm. Children and young people may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.
- Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in appendices 1 and 2.

- Any child or young person in any family in any setting could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".
- There are also a number of specific safeguarding concerns that we recognise our students may experience:
    - child missing from education
    - child missing from home or care
    - child sexual exploitation (CSE)
    - County lines
    - bullying including cyberbullying
    - domestic abuse
    - drugs
    - fabricated or induced illness
    - faith abuse
    - female genital mutilation (FGM)
    - forced marriage
    - gangs and youth violence
    - gender-based violence/violence against women and girls (VAWG)
    - mental health
    - private fostering
    - radicalisation
    - making or sharing of nudes or semi-nudes (including AI-generated images/deepfakes)
    - teenage relationship abuse
    - upskirting
    - trafficking
    - child-on-child abuse
    - modern slavery
    - financial exploitation

- child-to-parent abuse
- serious violence

Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sharing of nudes or semi-nudes put children in danger and that safeguarding issues can manifest themselves via child-on-child abuse.

We also recognise that abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

If staff are concerned about a child's welfare

- If contractors notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue they should record these concerns on an 'Expression of Concern Form' and pass it to the DSL. They may also discuss their concerns in person with the DSL, but the details of the concern should be recorded in writing.
- There will be occasions when staff may suspect that a child or young person may be at risk but have no 'real' evidence. The child or young person's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.
- Running Deer recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. However, they may also indicate a child, or young person is being abused or is in need of safeguarding.
- In these circumstances staff will try to give the child or young person the opportunity to talk. It is fine for staff to ask the student if they are OK or if they can help in any way.
- Following an initial conversation with the child or young person, if the member of staff remains concerned, they should discuss their concerns with the DSL and put them in writing.
- If the child or young person does begin to reveal that they are being harmed, staff should follow the advice below regarding a child or young person making a disclosure.

If a child or young person discloses to a member of staff

- We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something

will happen if they tell, they may have lost all trust in adults or believe that has happened is their fault. Sometimes they may not be aware that what is happening is abuse.

- A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

During their conversation with the child or young person, staff will:

- Listen to what the child has to say and allow them to speak freely.
- Remain calm and not overact or act shocked or disgusted – the child or young person may stop talking if they feel they are upsetting the listener.
- Reassure the child that it is not their fault and that they have done the right thing in telling someone.
- Not be afraid of silences – staff must remember how difficult it is for the child or young person and allow them time to talk.
- Take what the child is disclosing seriously.
- Ask open questions and avoid asking leading questions.
- Avoid jumping to conclusions, speculation or make accusations.
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- Avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong.
- Tell the child what will happen next.

If a child or young person talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on – staff are not allowed to keep secrets.

The member of staff should write up their conversation as soon as possible on the Expression of Concern form in the child's own words. Staff should make this a matter of priority. The record should be signed and dated, the member of staff's name should be printed, and it should also detail where the disclosure was made and who else was present. The record should be handed to the DSL.

Notifying Parents

Running Deer will normally seek to discuss any concerns about a child or young person with their parents or carers. This must be handled sensitively and normally the DSL/DDSL will make contact with the parent or carer in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's Social Worker (where applicable) or Front Door (MASH).

Where there are concerns about forced marriage or honour-based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

Making a referral

- Concerns about a child or a disclosure should be immediately raised with the DSL who will help decide whether a referral to children's services or other support is appropriate in accordance with Devon Children and Families Partnership Threshold Tool.
- If a referral is needed, then the DSL should make this rapidly and systems in place to enable this to happen. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves.
- The child or young person (subject to their age and understanding) and the parents or carers will be told that a referral is being made, unless to do so would increase the risk to the child or young person.
- If after a referral the child's situation does not appear to be improving the Designated Safeguarding Lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.
- If a child is in immediate danger or is at risk of harm a referral should be made to Front Door (MASH) and/or the police immediately. Anybody can make a referral.
- Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

Supporting Staff

- We recognise that staff who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

Children and young people who are particularly vulnerable

Running Deer recognises that some children and young people are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education, health and care plan).
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently missing/goes missing from care or from home.
- Is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking, sexual exploitation, financial exploitation or criminal exploitation.

- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- Has returned home to their family from care.
- Is showing early signs of abuse and/or neglect.
- Is at risk of being radicalised or exploited.
- Is a privately fostered child.
- Is pregnant and/or is a parent themselves.
- Has a medical condition.

Mobile Phones in School

Running Deer School is a **mobile phone-free environment**. Pupils do not have access to their mobile phones throughout the school day, including during lessons, breaktimes and lunchtimes. This is in line with DfE guidance on mobile phones in schools and KCSIE 2026.

Our Mobile Phone Policy sets out the full expectations and procedures for managing mobile phones in school.

Online Safety (including filtering and monitoring)

Our children and young people increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, twitter, Instagram, Snapchat and ooVoo.

Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Running Deer School and Running Deer Intervention Services, each have an online safety policy which explains how we try to keep students safe and how we respond to online safety incidents - these are available on the respective websites.

Young People are taught about online safety throughout the curriculum, and all staff receive online safety training which is regularly updated. The school online safety co-ordinator is the Head of School. The Intervention Services centre at Waterside, Berry Pomeroy, has a separate Online Safety Lead (DSO) in addition to the DSL and DDSL.

Safeguarding Risks of Generative AI and Technology

We recognise that technology, including generative artificial intelligence (AI), is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online, as well as face to face.

Staff are aware that:

- AI-generated content, including deepfake images and videos, can be used to harm, exploit or abuse children
- Children may create, share or be victims of AI-generated nudes or semi-nudes
- Generative AI can be used for grooming, exploitation or to create harmful content
- Children may not recognise AI-generated content as fake or manipulated

All staff receive training on the safeguarding risks associated with AI and emerging technologies as part of their regular safeguarding updates.

Filtering and Monitoring Systems

Running Deer has appropriate filtering and monitoring systems in place to:

- Limit children's exposure to online risks through school devices and networks
- Identify safeguarding concerns arising from children's online activity
- Protect children from harmful content, contact, conduct and commerce risks

Annual Review Requirements:

The filtering and monitoring lead, **Chris Hales**, supported by the DSL and IT staff, will review our filtering and monitoring systems **at least once every academic year**. This review will:

- Assess the effectiveness of current systems
- Consider the number and age range of pupils
- Identify pupils who may be at greater risk of harm

- Review how often pupils access IT systems
- Consider the proportionality of costs versus safeguarding risks
- Ensure systems meet the DfE's filtering and monitoring standards
- Address how filtering and monitoring requirements apply to generative AI
- Ensure systems do not 'over-block' and unreasonably restrict educational content

The Board of Directors will receive reports on the effectiveness of filtering and monitoring systems and ensure appropriate action is taken where improvements are needed.

Running Deer also recognises the importance of communicating regularly with parents and carers about children's internet use **outside of school** and provides guidance and resources to support online safety at home.

Supporting Children Questioning Their Gender Identity

Our Approach

Running Deer recognises that some children may experience questions about their gender identity. We approach all such situations with sensitivity, care and a commitment to safeguarding.

We will:

- Maintain professional curiosity about any child who may be vulnerable
- Recognise that children questioning their gender may be potentially vulnerable in terms of mental health and psychosocial needs
- Be aware that vulnerabilities may arise from family and peer relationships, or their broader social environment, including discriminatory bullying
- Take steps to prevent and address bullying of any child, including those who are lesbian, gay, bisexual or questioning their gender
- Put sanctions in place for bullying behaviour

We will not:

- Initiate any action regarding a child's social transition
- Make assumptions about what is best for a child
- Take action without parental involvement except in exceptionally rare circumstances

Responding to Requests for Social Transition

Running Deer will **only respond** to a request to socially transition in school if it is raised by a child or their parent. We will never initiate such discussions or actions.

If a request is made, we will:

1. **Take time to understand** the thoughts and feelings of the child through professional curiosity and careful listening
2. **Involve parents as a matter of priority** and treat their views with importance, except in exceptionally rare circumstances where this would place the child at significant risk
3. **Take a very careful approach** to any consideration of social transition, recognising that:
    - As a primary school, we will support full social transition **very rarely**
    - Social transition is a significant step that requires careful consideration
    - The child's best interests must be at the heart of any decision
4. **Document our decision-making process** thoroughly, including:
    - The request made and by whom
    - Discussions with the child and parents
    - Factors considered
    - Decisions made and rationale
    - Actions taken or not taken
5. **Base decisions on:**
    - Our statutory duty to safeguard and promote the welfare of all children
    - The importance of actively involving parents/carers
    - Our obligations under the Equality Act 2010 and Human Rights Act 1998
    - The individual circumstances and needs of the child
    - Professional advice where appropriate

Use of Single-Sex Spaces

Running Deer maintains single-sex spaces based on **biological sex**. This includes:

- Toilets

- Changing rooms
- Shower facilities
- Residential or boarding accommodation (if applicable)

There are no exceptions to this requirement, including for children who are socially transitioning or questioning their gender. This is a legal requirement and applies to safeguard all children.

We will ensure appropriate facilities are available that respect the dignity and privacy of all children.

Physical Education and Sports

Some sports and PE activities will be separated by **biological sex** where:

- The physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa)
- Safety concerns require separation

This segregation is not considered discriminatory under the Equality Act 2010 and is necessary to ensure fairness and safety in sport.

There are no exceptions, including for children who wish to socially transition.

Where there are no safety concerns, we will consider any request a child makes regarding how they participate in sports in line with:

- The best interests of the child
- The impact on other children
- The aim of creating a safe and fair environment for all children to participate in PE

Recording Biological Sex

Running Deer will accurately record a child's **biological sex** wherever sex is recorded in our systems and records. This is a legal requirement and ensures accurate data for safeguarding, health and educational purposes.

Addressing Bullying and Discrimination

We recognise our duty to:

- Prevent discriminatory bullying of children who are lesbian, gay, bisexual or questioning their gender
- Take prompt action to address any bullying or discrimination

- Create an inclusive environment where all children feel safe and respected

Our behaviour policy and anti-bullying procedures set out how we address all forms of bullying, including that based on perceived or actual sexual orientation or gender identity.

Anti-Bullying/Cyberbullying

Our policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying (including misogyny and misandry). We keep a record of known bullying incidents which is shared with and analysed by the governing body and/or Board of Directors. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Head of School or Centre Manager (Intervention Services) and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

Running Deer Intervention Services at Waterside, Berry Pomeroy, have an additional member of staff in the role of Online Safety Lead (DSO), whose role is detailed in their Online Safety Policy and available on the Intervention Services website.

Racist Incidents

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents and report them to the Local Authority.

Radicalisation and Extremism

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

Running Deer is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

Running Deer seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 6.

Opportunities are provided in the curriculum to enable children and young people to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014).

The Board of Directors, the Head of School, the Centre Manager (Intervention Services) and the Designated Safeguarding Lead (DSL) will assess the level of risk within the setting and put actions in place to reduce that risk. Risk assessment may include the use of premises by external agencies, anti-bullying policy and other issues specific to the setting's profile, community and philosophy.

When any member of staff has concerns that a child or young person may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then Devon & Cornwall Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and Board of Directors to raise concerns around Prevent (020 7340 7264). The DSL will follow Prevent procedures, completing the form at https://www.devon-cornwall.police.uk/advice/your-community/prevent-reporting-and-preventing-radicalisation-terrorism-and-extremism/

Domestic Abuse

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse (See Appendix 5).

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. More information and the indicators of CSE is set out in appendix 3. CSE can happen online and offline and all staff should be aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. Running Deer is aware there is a clear link between regular school absence/ truanting and CSE. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truanting and make reasonable enquiries with the child and parents to assess this risk.

The DSL will use the Devon Children and Families Partnership CSE Screening Tool on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identified any level of concern the DSL should contact their local Multi Agency Child Sexual Exploitation team MACSE and email the completed CSE Screening Tool along with a Front Door (MASH) enquiry form. If a child is in immediate danger the police should be called on 999.

Running Deer is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Children may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Running Deer School includes the risks of sexual exploitation in the PHSE and SRE curriculum. Students will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police.

The duty applies to all persons at Running Deer who are employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

Staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4.

Concerns about FGM outside of the mandatory reporting duty should be reported as per Running Deer's safeguarding procedures. Staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Staff should never attempt to intervene directly or through a third party. Contact should be made with Front Door (MASH).

Honour-based Violence

Honour based violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based violence might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion.
- Want to get out of an arranged marriage.
- Want to get out of a forced marriage.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

One Chance Rule

All staff are aware of the 'One Chance Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have 'one chance' to speak to a child or young person who is a potential victim and have just one chance to save a life.

Running Deer are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are place in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Running Deer recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a student may be in a private fostering arrangement they will raise this will the DSL and the DSL will notify Front Door (MASH) of the circumstances.

Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and neglect. Running Deer ensures that staff have the necessary skills and understanding to keep looked after/previously looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

At Running Deer School, the designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Devon County Council's Virtual School Head for Children in Care. The designated teacher for looked after children works with the Virtual School Head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan. The designated teacher will follow the statutory guidance 'Promoting the education of Looked After Children'.

Young Carers

A young carer is a child or young person under 18 whose life is affected by looking after someone in their family who has an illness, disability, mental health condition or drug or alcohol problem.

Caring responsibilities can have a significant impact on a child or young person's:

- Attendance at school
- Attainment and educational progress
- Behaviour and emotional wellbeing
- Social relationships and development
- Physical and mental health

Staff will be alert to the signs that a child may be a young carer, which may include:

- Tiredness or lateness
- Poor school attendance or punctuality
- Difficulty completing homework
- Behavioural problems or withdrawal
- Low self-esteem or anxiety
- Few friends or limited social interaction

Identifying young carers and their needs early is essential to make sure they receive the right support from the appropriate services. Where staff identify a child as a young carer, they will inform the DSL who will consider whether an early help assessment would be appropriate and what support can be offered. This is further explored in the Yong Cares Policy.

Children with Medical Conditions

Children with medical conditions may be more vulnerable to abuse, neglect or exploitation. Staff will be alert to:

- Signs that a child's medical needs are not being met
- A child being repeatedly sent to school without essential medication
- Parents/carers not providing relevant information about a child's medical condition
- Concerns that a child's condition is being fabricated or induced

We must make a safeguarding referral if we have concerns that a young person might be at an increased risk of being neglected, abused or exploited because of their medical condition.

Staff will ensure that children with medical conditions receive appropriate support and that their medical needs are properly managed in accordance with our Supporting Pupils with Medical Conditions policy.

Children Missing Education

Attendance, absence and exclusions are closely monitored. Running Deer will hold more than one emergency contact number for each child or young person when reasonably possible. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. This is further explored in the Lost and missing children policy

Serious Violence

All staff should be aware of the indicators that children may be at risk from, or are involved in, serious violent crime. These may include:

- Increased absence from school
- Changing friendships, or forming friendships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or assault, or unexplained injuries
- Significant change in wellbeing
- Unexplained gifts or possessions

Staff should also know the risk factors that increase the likelihood of involvement in serious violence, such as:

- Being male
- Having disrupted education e.g. suspensions, permanent exclusions and time in alternative provision (AP)
- Having experienced child maltreatment

- Having been involved in offending, such as theft or robbery

Running Deer will be alert to when children might be at highest risk of serious violence around the school day (for example, immediately after school). We will:

- Share information early with appropriate agencies when concerns arise
- Work with local partners to protect children from violence
- Provide support to children identified as being at risk
- Take a safeguarding approach to all incidents and concerns

Making or Sharing of Nudes or Semi-Nudes (including AI-generated images)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Making or sharing of nudes or semi-nudes refers to both images and videos (including those wholly or partially generated by artificial intelligence, such as deepfakes) where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age if 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents involving the making or sharing of nudes or semi-nudes must be treated as a safeguarding concern and dealt with in line with KCSIE 2026 guidance.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

AI-Generated Images (Deepfakes)

Staff must be aware that:

- Images can now be digitally altered or wholly generated using artificial intelligence
- "Deepfake" images and videos can be created without a child's knowledge or consent

- AI-generated nudes or semi-nudes are treated the same as real images under safeguarding procedures
- Creating, possessing or sharing AI-generated sexual images of children is illegal and harmful

Responding to Incidents

If a member of staff becomes aware of an incident involving the making or sharing of nudes or semi-nudes (including AI-generated images), they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. **Staff should not view, copy or print the imagery.**

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Front Door (MASH) or the Police as appropriate.

Immediate referral at the initial review stage should be made to Front Door (MASH)/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- The imagery has been created using AI without the child's knowledge or consent.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to students involved and may decide, with input from the Head of School or Centre Manager, to respond to the incident without escalation to Front Door (MASH) or the police.

In applying judgement, the DSL will consider if:

- there is a significant age difference between the sender/receiver.
- there is any coercion or encouragement beyond the sender/receiver.
- the imagery was shared and received with the knowledge of the child in the imagery.
- the child is more vulnerable than usual i.e. at risk.
- there is a significant impact on the children involved.
- the image is of a severe or extreme nature.
- the image has been generated using AI.
- the child involved understands consent.
- the situation is isolated or if the image been more widely distributed.
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances.
- the children have been involved in incidents relating to nudes or semi-nudes before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or Front Door (MASH). Otherwise, the situation will be managed within the school/setting.

The DSL will record all incidents involving the making or sharing of nudes or semi-nudes, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

Child-on-Child Abuse

The DSL, Governing Body/Board of Directors and Head Teacher will take due regard to Part 5, KCSIE 2026.

In most instances, the conduct of children and young people towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Running Deer recognise that children are capable of abusing their peers. **It will not be passed off as 'banter' or 'part of growing up'.**

Running Deer takes a **zero-tolerance approach** to all forms of child-on-child abuse and recognises that all such abuse is unacceptable and will be taken seriously.

Forms of Child-on-Child Abuse

The forms of child-on-child abuse include:

- **Bullying** (including cyber-bullying, prejudice-based and discriminatory bullying)
- **Physical abuse** (which may include an online element such as sharing videos of physical assaults)
- **Serious physical assault and harm**, or the threat of harm with a weapon
- **Sexual violence** (which may include an online element)
- **Sexual harassment**, including online sexual harassment
- **Causing someone to engage in sexual activity without consent**
- **Making or sharing of nudes or semi-nudes** (including AI-generated images/deepfakes)
- **Upskirting** (taking a picture under a person's clothes without their permission)
- **Initiation/hazing type violence and rituals**, which may include an online element
- **Child criminal exploitation (CCE)** and **child sexual exploitation (CSE)**
- **Harmful sexual behaviour (HSB)**
- **Domestic abuse** in intimate personal relationships (teenage relationship abuse)
- **Serious youth violence**

There are also different gender issues that can be prevalent when dealing with child-on-child abuse, including **misogyny and misandry**.

Understanding Harmful Sexual Behaviour (HSB)

Running Deer recognises that **harmful sexual behaviour (HSB) exists on a continuum** which may escalate into sexual harassment and sexual violence. We will always consider HSB in a child protection context.

HSB can include:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Making or sharing of nudes or semi-nudes
- Accessing or sharing pornography

- Upskirting

Staff should be aware that some sexual behaviours may be:

- **Developmentally appropriate** – normal exploration between children of similar age and development
- **Inappropriate** – behaviour that is not typical for the child's age or development but may not be abusive
- **Harmful/abusive** – behaviour involving coercion, threats, aggression, secrecy or exploitation

Further guidance on recognising harmful sexual behaviour is set out in Appendix 2.

Our Approach to Prevention

Running Deer aims to reduce the likelihood of child-on-child abuse through:

- The established ethos of respect, friendship, courtesy and kindness.
- High expectations of behaviour.
- Clear consequences for unacceptable behaviour.
- Providing a developmentally appropriate PSHE curriculum which develops students' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.
- Systems for any student to raise concerns with staff, knowing that they will be listened to, valued and believed.
- Robust risk assessments and providing targeted work for students identified as being a potential risk to other students and those identified as being at risk.
- Teaching children about consent, boundaries and respectful relationships

Research indicates that young people rarely disclose child-on-child abuse and that if they do, it is likely to be to their friends. Therefore, Running Deer will also educate children and young people in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the setting and what services they can contact for further advice.

Responding to Child-on-Child Abuse

When developing our policies and procedures, we keep in mind that:

- All staff need to maintain an attitude of **'it could happen here'** – even if there are no reports, it does not mean it's not happening

- HSB can occur between children of any age, and exists on a continuum which may escalate into sexual harassment and sexual violence
- It can occur online or face-to-face, both physically and verbally
- There should be a **zero-tolerance approach** to sexual violence and sexual harassment and that it is never acceptable – passing it off can lead to a culture of unacceptable behaviour, misogyny/misandry, an unsafe environment, and a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- **Misogyny and misandry are escalatory**, and early identification minimises the risks of HSB, sexual harassment and sexual violence
- Addressing inappropriate behaviour can help prevent abusive/violent behaviour – dismissing behaviour such as grabbing, flicking bras and lifting up skirts risks normalising them
- Victims of this abuse will likely find the experience distressing, which can affect their progress in school. This can be made worse if the alleged perpetrator attends the same school
- Girls are more likely to be victims of sexual harassment and assault, and children with disabilities are more likely to be abused (although anyone can be affected)
- **All victims should know they'll be taken seriously, be supported and kept safe. They shouldn't be made to feel ashamed for making a report or that they are causing a problem by reporting sexual violence or sexual harassment**

Any concerns, disclosures or allegations of child-on-child abuse in any form should be referred to the DSL using Running Deer child protection procedures as set out in this policy. Where a concern regarding child-on-child abuse has been disclosed to the DSL(s), advice and guidance will be sought from Front Door (MASH) and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

If a young person's behaviour negatively impacts on the safety and welfare of other young people, then safeguards will be put in place to promote the well-being of the students affected and the victim and perpetrator will be provided with support.

County Lines and Criminal Exploitation

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more areas within the UK, using dedicated mobile phone lines or other forms of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required.

County Lines and Criminal Exploitation - CONTINUED

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity:

- In exchange for something the victim needs or wants; and/or
- For the financial advantage or increased status of the perpetrator or facilitator; and/or
- Through violence or the threat of violence

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Recognising County Lines Exploitation

Where a professional believes a child to be involved in County Lines, there should be **no delay** in making a safeguarding referral using the local area's agreed pathway process. If there are reasonable grounds to suspect that a child is suffering or is likely to suffer significant harm, a Section 47 Enquiry (Children Act 1989) should be initiated.

Key indicators that a child may be involved in county lines:

- Frequently going missing from school, home or care
- Travelling to locations, or being found in areas they have no obvious connections with, including seaside or market towns
- Unwillingness to explain their whereabouts
- Acquiring money, clothes, accessories or mobile phones which they seem unable to account for
- Receiving excessive texts or phone calls at all hours of the day
- Having multiple mobile phone handsets or SIM cards
- Withdrawing or having sudden changes in personality, behaviour or the language they use
- Having relationships with controlling or older individuals and groups
- Unexplained injuries
- Carrying weapons
- Significant decline in school results or performance
- Being isolated from peers or social networks
- Associating with or being interested in gang culture

- Self-harming or having significant changes in mental health

Who is Vulnerable?

Any child could potentially be at risk of criminal exploitation by a county lines gang. Factors that make a county lines gang more likely to target, groom and exploit a child include:

- The child having experienced neglect, physical and/or sexual abuse in the past
- Social isolation or social difficulties
- Poverty
- Homelessness or insecure accommodation status
- Connections with other people involved in gangs
- Having a learning disability
- Having mental health problems
- Having substance misuse issues
- Being in care or having a history of being in care
- Being excluded from mainstream education
- Economic vulnerability

Permanent exclusion from mainstream education has been identified as a critical event that can lead to young people becoming vulnerable to criminal exploitation.

Our Response

Staff will:

- Be alert to the signs of criminal exploitation
- Report concerns immediately to the DSL
- Recognise that children involved in criminal exploitation need to be treated as **victims**, even if they commit crimes themselves
- Understand that even if criminal activity appears to be consensual, the child may have been criminally exploited
- Be aware that girls are at risk of criminal exploitation too, even though their experiences may be different from boys' experiences

The DSL will make referrals to Front Door (MASH) and work with partner agencies to safeguard children at risk of or experiencing criminal exploitation.

Allegations Against Staff

All staff should take care not to place themselves in a vulnerable position with a child or young person. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction.

We understand that a child or young person may make an allegation against a member of staff or staff may have concerns about another staff member.

If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Head of School or Centre Manager (Intervention Services).

The Head of School or Centre Manager (Intervention Services) on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) at the earliest opportunity and before taking any further action.

If the allegation made to a member of staff concerns the Head of School or Centre Manager (Intervention Services), the person receiving the allegation will immediately inform the Board of Directors who will consult the LADO as above, without notifying the Head of School or Centre Manager (Intervention Services) first. [NB where the Head of School is also the sole proprietor of an independent school the concerns should be reported directly to the LADO]

Running Deer will follow the Devon procedures for managing allegations against staff, procedures set out in Keeping Children Safe in Education (KCSIE) 2026 and the school's Managing Allegations policy and procedures.

Suspension of the member of staff, excluding the Head of School, against whom an allegation has been made, needs careful consideration, and the Head of School will seek the advice of the LADO and an HR Consultant in making this decision.

In the event of an allegation against the Head of School or Centre Manager (Intervention Services), the decision to suspend will be made by Board of Directors with advice as above.

Allegations regarding the proprietor of an independent school will be referred to the Local Authority Designated Officer (Independent Schools only).

We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

Staff, parents and Board of Directors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

Low-Level Concerns

What is a low-level concern?

Running Deer recognises the importance of creating and maintaining a culture of openness, trust and transparency to encourage all staff to confidentially share any concern, no matter how small, about their own behaviour or that of another member of staff, supply staff, volunteer or contractor which may have fallen below the standards expected.

A low-level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult working in or on behalf of Running Deer may have acted in a way that:

- Is inconsistent with the staff behaviour policy (code of conduct), including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

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

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Discussing their personal or sexual relationships with or in the presence of children
- Making unprofessional comments about a child's appearance or body
- Humiliating children

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.

Why should low-level concerns be shared?

Low-level concerns should be shared responsibly and with the right person. This is important because:

- **Ensuring appropriate action is taken** – sharing concerns helps to identify any weakness in Running Deer's safeguarding system and enables us to take appropriate action
- **Protecting staff** – it creates a safer working environment where staff are clear about what appropriate behaviour looks like and are confident to report concerns
- **Protecting children** – by identifying concerning, problematic or inappropriate behaviour early, we can minimise the risk of abuse

Reporting a low-level concern

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues.

Low-level concerns about a member of staff should be reported to:

- **Nick Hurst (Proprietor and DSL)** – for concerns about any staff member, volunteer or contractor
- **Geraldine Carter (Head of School)** – for concerns about staff at Running Deer School
- **Adam Baxter (DSL for Intervention and Family Services)** – for concerns about staff at Intervention and Family Services

If the low-level concern is about the Head of School or Centre Manager, it should be reported to Nick Hurst (Proprietor).

If the low-level concern is about Nick Hurst (Proprietor), it should be reported to **Jo Winterburn (Deputy DSL)** or directly to the Board of Directors.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns internally. Staff can call: 0800 028 0285 (available from 8:00 AM to 8:00 PM, Monday to Friday) or email: help@nspcc.org.uk

Staff can also report concerns anonymously if they feel unable to do so in person, though we encourage open dialogue wherever possible.

How to report a low-level concern

When reporting a low-level concern, staff should:

- **Make a written record** as soon as possible, noting what was observed, heard or reported, including:
    - Date, time and location of the incident
    - What was said or done and by whom
    - Who else was present

    - The context in which the behaviour occurred
- **Be factual and objective** – avoid opinions or judgements, simply record what happened
- **Submit the concern promptly** to the appropriate person listed above

Staff can use the Expression of Concern Form or email their concern directly to the relevant DSL.

How low-level concerns will be handled

When a low-level concern is reported, the DSL or Head of School/Centre Manager will:

1. **Speak to the person reporting the concern** (unless it has been raised anonymously) to gather any additional information and context
2. **Speak to the individual about whom the concern has been raised** (in most cases) to:
    - Understand their perspective
    - Provide them with an opportunity to explain
    - Determine whether the behaviour was inadvertent or a misunderstanding
3. **Review the concern** considering:
    - The context and circumstances
    - Whether the behaviour is part of a pattern
    - Whether the staff behaviour policy (code of conduct) has been breached
    - Whether further action is needed
4. **Decide on the appropriate response**, which may include:
    - No further action (if the concern is unfounded)
    - Informal discussion or guidance with the staff member
    - Additional training or support
    - Formal disciplinary action (if the behaviour is more serious than initially thought)
    - Referral to the LADO (if the threshold for an allegation is met)
5. **Record the concern** including:
    - Details of the concern
    - The context in which it arose
    - Action taken

- Rationale for decisions and action taken
- Resolution

Recording low-level concerns

All low-level concerns will be recorded in writing and stored securely on CPOMS (or in a confidential file if CPOMS is not available). Records will include:

- Details of the concern
- The context in which the concern arose
- Action taken
- The rationale for decisions and actions
- Resolution and outcome

We ensure all CPOMS records are checked by two Level 3 Safeguarding trained members of staff.

Records will be kept confidential and held securely in compliance with the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025. They will be reviewed periodically by the DSL and Head of School/Centre Manager to identify any patterns of concerning, problematic or inappropriate behaviour.

Records will be retained at least until the individual leaves employment at Running Deer. Where a pattern of behaviour is identified, records may be retained for longer in accordance with our data retention policy and legal requirements.

Confidentiality and information sharing

Low-level concerns will be treated confidentially. Information will only be shared on a need-to-know basis to:

- Protect children
- Allow the concern to be properly investigated and addressed
- Support the staff member concerned

The person reporting the concern will be informed that the matter will be handled confidentially, but that some information may need to be shared to address the concern appropriately.

References and employment

Low-level concerns will not be included in references unless they have resulted in formal disciplinary action or form part of a pattern of behaviour that meets the threshold for inclusion.

However, where a staff member moves to another organisation, we will consider whether any information about low-level concerns should be shared with the new employer to safeguard children in that setting. This will be decided on a case-by-case basis in consultation with HR and legal advice where necessary.

Creating a culture of openness

Running Deer is committed to creating an environment where:

- Staff feel confident to self-report if they have found themselves in a situation which could be misinterpreted
- Staff feel supported to report concerns about colleagues
- All concerns are taken seriously and handled sensitively
- Staff understand that reporting concerns helps to protect everyone – children, staff and the organisation

All staff will receive training on low-level concerns as part of their safeguarding induction and annual updates. This will include:

- What constitutes a low-level concern
- How and when to report concerns
- How concerns will be handled
- The importance of maintaining confidentiality

Review

The DSL and Head of School/Centre Manager will review all low-level concerns regularly (at least termly) to identify any patterns or trends that may indicate a need for:

- Additional training or support for staff
- Changes to policies or procedures
- Further investigation or action

The Board of Directors will receive anonymised information about the number and nature of low-level concerns as part of their safeguarding oversight responsibilities.

Whistleblowing

We recognise that children and young people cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in Running Deer's safeguarding arrangements. If it becomes necessary to consult outside the service, they should speak, in the first instance, to the LADO following the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) and email: help@nspcc.org.uk

Whistle-blowing regarding the Head of School or Centre Manager (Intervention Services) should be made to the Managing Director of Running Deer C.I.C whose contact details are readily available to staff (as pertinent to setting).

Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

Such events should be recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained.

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundary.

Confidentiality, Sharing Information and Data Protection

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, Head of School, Centre Manager (Intervention Services) or Board of Directors (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.

However, following a number of cases where senior leaders had failed to act upon concerns raised by staff, Keeping Children Safe in Education (KCSIE) 2026 emphasises that any member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.

Information sharing is guided by the following principles:

- Necessary and proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

This Policy Also Links to Our Policies on

- Behaviour
- Staff Behaviour Policy | Code of Conduct
- Whistleblowing
- Anti-bullying
- Health & Safety
- Parental concerns
- Curriculum (Running Deer School)
- First Aid
- De-escalation and Physical Intervention
- Mobile Phones
- Recruitment
- Intimate Care
- Exclusion
- Online Safety Policy and Risk Assessment

Contact Running Deer School

Running Deer School, Butterdon Wood, Moretonhampstead, Devon, TQ13 8PY

Telephone: 01647 400201 | Email: school@runningdeer.org.uk

Website: https://www.runningdeerschool.org.uk

Contact Running Deer Intervention Services

Running Deer Intervention Services, Waterside, Berry Pomeroy, TQ9 6LH

Email: ifs@runningdeer.org.uk

APPENDICES

Appendix 1: Recognising Signs of Child Abuse

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

Signs of Abuse in Children

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age-inappropriate sexual behaviour

- Child Sexual Exploitation

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services
- The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/ low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment

- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, handprints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/ her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Appendix 2: Sexual Abuse & Harmful Sexual Behaviour

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Staff should be vigilant to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Making or sharing of nudes or semi-nudes (including AI-generated images)
- Initiation/hazing type violence and rituals
- Upskirting - when someone takes a picture under a person's clothing with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause humiliation, distress or alarm

Developmental Sexual Activity

Encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour

Can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person.

It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Harmful/Abusive Sexual Activity

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society's standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

Appendix 3: Child Sexual Exploitation

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Going missing from home or school
- Regular school absence/truanting
- Underage sexual activity
- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, 'swapping' sex
- Repeat sexually transmitted infections

- In girls, repeat pregnancy, abortions, miscarriage
- Receiving unexplained gifts or gifts from unknown sources
- Having multiple mobile phones and worrying about losing contact via mobile
- Online safety concerns such as making or sharing of nudes or semi-nudes or being coerced into sharing explicit images
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Associating with other young people involved in sexual exploitation
- Recruiting other young people to exploitative situations
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Mood swings, volatile behaviour, emotional distress
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Drug or alcohol misuse
- Getting involved in crime
- Police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint, sexual assault

Appendix 4: Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation – entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable

- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

The 'One Chance' Rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action without delay and make a referral to children's services.

Appendix 5: Domestic Abuse

How does it affect children?

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self-harm and anxiety.

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

What should I do if I suspect a family is affected by domestic abuse?

Contact: https://new.devon.gov.uk/dsva/

Appendix 6: Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs.
- Seek to provoke others to terrorist acts.
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts.
- Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

6. **Indicators of vulnerability include:**

- **Identity Crisis** – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- **Personal Crisis** – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- **Personal Circumstances** – migration; local community tensions; and events affecting the student / student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations** – the student may have perceptions of injustice; a feeling of failure; rejection of civic life.
- **Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- **Special Educational Need** – students / students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. **More critical risk factors could include:**

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.

Appendix 6: Indicators of Vulnerability to Radicalisation - CONTINUED

- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.

- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Prevent Duty can be accessed via this link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance__England_Wales_V2-Interactive.pdf

Appendix 7: Further Resources and Advice

Further advice on child protection is available from:

- NSPCC: http://www.nspcc.org.uk/
- Childline: http://www.childline.org.uk/pages/home.aspx
- Anti-Bullying Alliance: http://anti-bullyingalliance.org.uk/
- Beat Bullying: http://www.beatbullying.org/
- Childnet International making the internet a great and safe place for children. Includes resources for professionals and parents http://www.childnet.com/
- Thinkuknow (includes resources for professionals and parents) https://www.thinkuknow.co.uk/
- Safer Internet Centre http://www.saferinternet.org.uk/
- Transgender awareness | support http://www.mermaidsuk.org.uk/
- Intercom trust transgender guidance

Appendix 8: Local Authority Contact Details

DEVON COUNTY COUNCIL

For Early Help, Consultation and Enquiries please contact:

Telephone: 0345 155 1071 | Fax: 01392 448951 | Email: FrontDoorsecure@devon.gcsx.gov.uk

Enquiry Form available at: https://new.devon.gov.uk/making-a-Front Door-enquiry

Post: Multi-Agency Safeguarding Hub, P.O. Box 723, Exeter EX1 9QS

Emergency Duty Team out of hours: 0845 6000 388

Police non-emergency: 101

For all LADO enquiries: Exeter (01392) 384964

Website: https://new.devon.gov.uk

Early Help Team

Senior Manager: TBC

Manager Exeter and South: TBC

Manager Mid & East: Ian Flett 07815 562 370

Manager South & West: Karen Hayes 07854 253424

Manager Northern: Sarah Simpson 07854 304 512

Locality Early Help Mailbox

North: earlyhelpnorthsecuremailbox@devon.gcsx.gov.uk

Mid & East: earlyhelpmideastsecuremailbox@devon.gcsx.gov.uk

South & West: earlyhelpsouthsecuremailbox@devon.gcsx.gov.uk

Exeter: earlyhelpexetersecuremailbox@devon.gcsx.gov.uk

For emergencies outside of office hours please call: 0345 600 0388 or 0845 600 0388

TORBAY COUNCIL

If you feel a child is in immediate danger, please call 999. If you are worried about a child, please call the Torbay Multi-Agency Safeguarding Hub on 01803 208100 or email mash@torbay.gov.uk

Out of office hours please call 0300 4564 876.

The MASH is a team of people who continue to be employed by their individual agencies but who are co-located in one office. http://www.torbaysafeguarding.org.uk/

Torbay MASH is co-located in Tor Hill House, Torquay. Torbay MASH currently consists of:

- Children's Social Care
- The Police

- Safeguarding Health team
- Torbay Education Safeguarding Service (TESS)
- Probation

To report a concern:

http://torbaysafeguarding.org.uk/professionals/hub/

PLYMOUTH CITY COUNCIL

If you are a member of the public: If you're worried about a child or young person, or think they're being abused, please speak with a professional that works with children at the earliest opportunity. If possible, speak to someone that works with the child/family you are worried about.

If you can't do this, or need any support, then please call **01752 668000**.

The multi-disciplinary team will respond to concerns and referrals between 8am to 8pm Monday to Friday, and 9am to 5pm on Saturdays, Sundays and Bank Holidays.

Outside of these hours, an Emergency Duty Service will always be on-call to review any overnight enquiries and respond to children at immediate risk of significant harm, urgent adult safeguarding risks and immediate risk of homelessness.

If you are a Professional:

If you are worried about a child or young person, then in the first instance please read our guidance on the **Building Support** page, to help you understand how to best support that child, young person or their family. Where the involvement of statutory services (Children's Social Care) might be appropriate, please call **01752 668000**.

MASH Consultation Line For Professionals: If you are a professional, you can call the MASH Consultation Line for advice and guidance around those situations where you're unclear or unsure about the appropriate support, or if a referral into children's social care is needed. You can speak to the MASH Consultation Line about a range of hypothetical issues or concerns.

To speak about a specific child you should have consent from the parents or carers providing it is safe to do so. The only time this isn't applicable is when seeking consent might place a child at risk of further harm.

The number to call is **01752 304339** and is open 9am to 4pm, Monday to Friday

(excluding Bank Holidays) and will not be available during hours that are covered by the Emergency Duty Team.

The consultation line does not replace the right of partner agencies to make a referral directly into Children's Social Care when the concerns may constitute significant harm.

Online Professional Enquiry Form:

If you want to speak to the allocated social worker for a child already receiving children's social care support, and it's not an urgent safeguarding concern, you can request a call back by completing the online Professionals Enquiry Form.

DORSET COUNTY COUNCIL

Child Advice and Duty Service (formerly MASH)

Single point of contact for safeguarding concerns Tel: 01305 228866

To report a concern: https://pandorsetscb.proceduresonline.com/p_report_concerns.html

https://pdscp.co.uk/

Westport House Worgret Road Wareham BH20 4PP

Opening hours

Monday to Friday: 8am to 10pm

Saturday, Sunday and bank holidays: 9am to 10pm

Pan-Dorset Safeguarding Children Partnership Contact Details

Organisation/Role	Position	Name	Telephone	Email
Pan-Dorset Safeguarding Children Partnership	Business Manager	Laurence Doe	01305 221350	laurence.doe@dorsetcouncil.gov.uk

Organisation/Role	Position	Name	Telephone	Email
Pan-Dorset Safeguarding Children Partnership (EAST) Bournemouth Civic Centre, Bourne Avenue, Bournemouth BH2 6DY Tel: 01202 458873	Safeguarding Co-Ordinator	Kerrie Ainley	01202 127465	Kerrie.Ainley@bcpcouncil.gov.uk
	Administrator	Joanna Lee	01202 817412	Joanna.Lee@bcpcouncil.gov.uk
Pan-Dorset Safeguarding Children Partnership (WEST) West Court, County Hall, Colliton Park, Dorchester DT1 1XJ Tel: 01305 221196	Business Support Manager	Sophie Cole	01305 221349	sophie.cole@dorsetcouncil.gov.uk
	Administrator	Charlie Miller	01305 221196	Charlene.miller@dorsetcouncil.gov.uk
Pan-Dorset Child Death Overview Panel West Court, County Hall, Colliton Park, Dorchester,	CDOP Administrator	Post out to advert	01305 221644	cdop@dorsetcouncil.gov.uk

Organisation/Role	Position	Name	Telephone	Email
DT1 1XJ Tel: 01305 221644				
Pan-Dorset Training West Court, County Hall, Colliton Park, Dorchester, DT1 1XJ Tel: 01305 221645	Training Coordinator	Helen Warburton	01305 228476	helen.warburton@dorsetcouncil.gov.uk
	Senior Training Officer	Vacant	Vacant	pan-dorsetscptraining@dorsetcouncil.gov.uk
	Training Administrator	Jo Hickson	01305 221645	
	Training Administrator	Katy Moore	01305 221645	

Children's Referrals

Area	Contact	Email	Telephone
Bournemouth, Christchurch and Poole	First Response Hub	childrensfirstresponse@bcpcouncil.gov.uk	01202 735046

Area	Contact	Email	Telephone
Dorset	Children's Advice & Duty Service	dorchesterlocality@dorsetcouncil.gov.uk	01305 228558

Dorset Council Safeguarding Contacts

Safeguarding Role	Position	Name	E-mail	Telephone
Director	Corporate Director for Children's Services	Theresa Leavy	theresa.leavy@dorsetcouncil.gov.uk	01305 224166
Safeguarding Lead	Head of Quality Assurance and Partnerships	Sunita Khattra-Hall	Sunita.Khattra-Hall@dorsetcouncil.gov.uk	01305 228372

Safeguarding Role	Position	Name	E-mail	Telephone
Safeguarding Education Service Manager	Designated Safeguarding Manager	Kelvin Connelly	kelvin.connelly@dorsetcouncil.gov.uk	01305 221407
LADO	Safeguarding Advisor	Martha Sharp / Lynne Bowman	Martha.sharp@dorsetcouncil.gov.uk / Lynne.bowman@dorsetcouncil.gov.uk	01305 228323 / 01305 224034
Safeguarding Advisor -Schools	Safeguarding Advisor	Laura Tulk / Jack Corrigan	Laura.tulk@dorsetcouncil.gov.uk / Jack.corrigan@dorsetcouncil.gov.uk	01202 868264 / 01258 474031

Bournemouth, Christchurch and Poole Council Safeguarding Contacts

Safeguarding Role	Position	Name	E-mail	Telephone
Director of Children'	Corporate Director	Cathi Hadley	Cathi.Hadley@bcpcouncil.gov.uk	01202 138165

Safeguarding Role	Position	Name	E-mail	Telephone
s Services	– Children's Services			
Children Social Care Director	Service Director – Children's Safeguarding and Early Help	Juliette Blake	Juliette.Blake@bcpcouncil.gov.uk	01202 794250
Service Director – Children & Young People	Service Director – Children & Young People	Sarah Rempel	sarah.rempel@bcpcouncil.gov.uk	01202 126753
Director – Children & Young People	Director – Children & Young People	Sara Scholey	Sara.Scholey@bcpcouncil.gov.uk	01202 127556
Service Director for Quality Assurance	Service Director for Quality Assurance, Performa	Rachel Gravett	rachel.gravett@bcpcouncil.gov.uk	01202 128993

Safeguarding Role	Position	Name	E-mail	Telephone
	nce Improvement & Governance			
Consultant, MASH	Service Manager	Shan Searle	Shan.Searle@bcpcouncil.gov.uk	01202 138121
Assessment, Complex Safeguarding and EOC	Service Manager	Nigel Burton	nigel.burton@bcpcouncil.gov.uk	01202 093441
Children in Care and Care Experienced Young People	Service Manager	Nicole Mills	Nicole.mills@bcpcouncil.gov.uk	01202 118508
Head of Quality Assurance	Interim Head of Quality Assurance, Safeguarding & Partnerships	Tammy Lawrence	tammy.lawrence@bcpcouncil.gov.uk	01202 118489

Safeguarding Role	Position	Name	E-mail	Telephone
LADO	Local Authority Designated Officer	Stephanie Power / Tina Cooper / Allyson Donovan	LADO@bcpcouncil.gov.uk	01202 817600
Safeguarding in Education	Education Safeguarding Advisers	Julie Murphy / Sue Wickings	juliemurphy@bcpcouncil.gov.uk / sue.wickings@bcpcouncil.gov.uk	01202 633694 / 01202 456117

Health Organisations

Organisation	Position	Name	E-mail	Telephone
NHS Dorset	Designated Doctor	Dr Wendy D'Arrigo	Wendy.D'Arrigo@dchft.nhs.uk	01305 253730
NHS Dorset	Head of Safeguarding & lead for any allegations against health	Shiela Willoughby	Shiela.willoughby@nhsdorset.nhs.uk	

Organisation	Position	Name	E-mail	Telephone
	professionals			
NHS Dorset	Designated Nurse for Looked After Children	Penny Earney	Penny.Earney@nhsdorset.nhs.uk	01305 361051
Dorset County Hospital	Designated Doctor for Child Deaths - West	Dr Wendy D'Arrigo	Wendy.D'Arrigo@dchft.nhs.uk	01305 253730
Poole Hospital	Designated Doctor for Child Deaths - East	Dr Ann Dewar	Ann.dewar@uhd.nhs.uk	01202 665511
NHS Dorset	Children's Safeguarding Lead GP	Dr Isi Sosa	isi.sosa@dorset.nhs.uk	01305 213644
NHS Dorset	Adult & Children's Safeguarding Lead GP	Dr Sam Abdollahian	sam.abdollahian@nhsdorset.nhs.uk	01305 213644
Dorset Healthcare	Professional Lead for Safeguarding	Alison Clark	Alison.clark45@nhs.net	01305 361465

Organisation	Position	Name	E-mail	Telephone
UHD	Head of Safeguarding	Philippa Knight	Philippa.Knight@uhd.nhs.uk	0300 019 4235
	Named Midwife for Safeguarding	Kerry Medina	Kerry.Medina@uhd.nhs.uk	0300 019 2155
Dorset County Hospital	Named Nurse for Safeguarding	Sarah Cake	sarah.cake@dchft.nhs.uk	01305 255740
	Named Midwife for Safeguarding	Katrina Cunningham	katrina.cunningham@dchft.nhs.uk	01305 254267
Poole Hospital	Named Nurse for Safeguarding	Lynne Lourence	lynne.lourence@poole.nhs.uk	0300 019 8275/5574
	Named Midwife for Safeguarding	Karey Pitkin	Karey.Pitkin@poole.nhs.uk	01202 442319
West Dorset	Paediatrician	Ask for pediatric consultant or specialist registrar		Normal working hours: 01305 254748 Out of

Organisation	Position	Name	E-mail	Telephone
		on-call for safeguarding		hours: 01305 251150 bleep 523
East Dorset, Poole and Bournemouth	Paediatrician	Ask for pediatric consultant on-call for safeguarding		Normal working hours: 01202 448312 Out of hours: 01202 665511

Dorset Police

Team/Function	e-mail	Telephone
Emergency (child in immediate need of protection)	n/a	999
Non-emergency number	n/a	101
Safeguarding referral unit	mash@dorset.pnn.police.uk	01202 123334

Appendix 9: Expression of Concern Form (For Use by Contractors and Visitors)

CONFIDENTIAL - Expression of Concern Form

This form should be completed if you have any concerns about a child's safety or welfare

All contractors and visitors have a responsibility to safeguard children. If you notice anything that concerns you about a child or young person, you must report it immediately using this form.

Once completed, this form must be handed immediately to a Designated Safeguarding Lead (DSL) or member of staff.

Section 1: Your Details

| **Your Name:** | | | **Company/Organisation:** | | | **Role/Position:** | | | **Contact Number:** | | | **Date of Concern:** | | | **Time of Concern:** | |

Section 2: Child/Young Person Details

| **Child's Name (if known):** | | | **Approximate Age:** | | | **Location where child was seen:** | |

Section 3: Nature of Concern

Please tick the type of concern:

☐ Physical injury or signs of abuse ☐ Emotional distress or behaviour concerns ☐ Neglect (e.g., appearance, hygiene, hunger) ☐ Sexual abuse or inappropriate sexual behaviour ☐ Child-on-child abuse ☐ Online safety concern ☐ Radicalisation or extremism concern ☐ Domestic abuse (child disclosed or signs observed) ☐ Other safeguarding concern (please specify below)

Section 4: Details of Concern

Please provide a detailed account of what you observed, heard, or were told. Use the child's own words where possible. Be specific about what you saw/heard, when, and where.

Include:

- What exactly did you see or hear?
- When and where did this happen?
- Who else was present?
- What was said (use exact words if a disclosure was made)?
- Any physical signs or injuries observed (use body map overleaf if appropriate)?

[Space for written response]

Continue on a separate sheet if necessary

Section 5: Your Actions

What action did you take?

☐ Reported immediately to a member of staff (name): _____ ☐ Ensured the child was safe ☐ Other (please specify): _____

Did you speak to the child? ☐ Yes ☐ No

If yes, what did you say?

[Space for written response]

Section 6: Declaration

I confirm that the information provided on this form is accurate to the best of my knowledge.

Signature:	**Date:**

Section 7: For DSL Use Only

| **Form received by (DSL/Staff Name):** | | | **Date received:** | **Time received:** | | **Action taken:** | ☐ Discussed with DSL
☐ Recorded on CPOMS
☐ Referral to Front Door (MASH)
☐ Parents contacted
☐ Police contacted
☐ Other (specify): | | **Details of action:** | | | **Follow-up required:** | ☐ Yes ☐ No | | **DSL Signature:** | **Date:** |

Important Information for Contractors and Visitors

What should I do if I'm concerned about a child?

1. **Act immediately** - safeguarding concerns cannot wait
2. **Complete this form** with as much detail as possible

3. **Hand the form immediately** to any member of staff or directly to a Designated Safeguarding Lead
4. **Do not investigate** - this is the responsibility of the DSL and appropriate agencies
5. **Maintain confidentiality** - only discuss your concern with the DSL or staff member

Who are the Designated Safeguarding Leads?

Running Deer School:

- **DSL:** Geraldine Carter (Head of School) - 01647 400201
- **DDSL:** Claire Kennard
- **DSL:** Nick Hurst
- **DDSL:** Jo Winterburn

Running Deer Intervention Services:

- **DSL:** Adam Baxter
- **DDSL:** Rachael Knight
- **Online Safety Lead:** Lee

- **END OF POLICY**

Policy Review Date: 01/09/2027

This policy will be reviewed annually or sooner if there are changes to legislation or guidance.

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
Part 3: Welfare, Health and Safety of Pupils			
Standard 7 - Safeguarding	Must comply with Section 157 of Education Act 2002	Policy explicitly states compliance with "Section 157 of the Education Act 2002 (Independent schools only, including academies and CTCs)" ...	Section 157 listed in legislation section
Standard 7 - Safeguarding	Must have regard to KCSIE guidance	Policy states "Keeping Children Safe in Education (KCSIE), 2026" as key safeguarding legislation considered when drafting the policy ...	KCSIE 2026 compliance throughout
Standard 7 - Safeguarding	All staff must read Part 1 of KCSIE	Policy requires "All staff and volunteers read KCSIE Part 1 (2026) in full annually and sign to say they read and understood it. There is no longer a condensed version - all staff must read Part 1 in its entirety" ...	Mandatory annual reading and sign-off
Standard 7 - Safeguarding	Must have a written safeguarding policy	Policy document itself demonstrates compliance with comprehensive 50+ page safeguarding policy	Complete safeguarding policy provided
Standard 7 - Safeguarding	Policy must be available to parents	Policy states "The child safeguarding policy is made available via the school's and Intervention Services' websites, and parents and carers are made aware of this policy and their entitlement to have a copy" ...	Website publication and parental awareness

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
Standard 7 - Safeguarding	Must have appropriate arrangements for safeguarding and promoting welfare	Policy defines safeguarding 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 impairment of children's mental and physical health or development" ...	Comprehensive safeguarding arrangements
Standard 7 - DSL Requirements	Must appoint a DSL who is a member of SLT	Policy states "The Designated Safeguarding Lead (DSL) for Running Deer School is Geraldine Carter, Head of School" and "Holds ultimate responsibility for safeguarding and child protection in the school or Intervention Services and is a member of the SLT" ...	DSL is Head of School (SLT member)
Standard 7 - DSL Training	DSL must undertake appropriate training updated every 2 years	Policy states "On appointment, the DSL and deputy undertake appropriate identified training offered by DCFP or other provider every two years" ...	Two-yearly DSL training requirement
Standard 7 - Staff Training	All staff must receive appropriate safeguarding training	Policy requires "All staff receive safeguarding and child protection training, including online safety, at induction in line with advice from Devon Children and Families Partnership which is regularly updated (for example, via email, e-bulletins and staff meetings), as required, but at least annually" ...	Annual safeguarding training minimum
Standard 7 - Governor Training	Governors must receive safeguarding training	Policy states "School governors will have safeguarding training, including online safety, at induction" ...	Governor induction training



Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
Standard 7 - Child-on-Child Abuse	Must have procedures for child-on-child abuse	Policy includes comprehensive section on child-on-child abuse stating "The DSL, Governing Body/Board of Directors and Head Teacher will take due regard to Part 5, KCSIE 2026" and lists all forms including "Bullying, Physical abuse, Sexual violence, Sexual harassment, Making or sharing of nudes or semi-nudes" ...	Detailed child-on-child abuse procedures
Standard 7 - Sexual Violence & Harassment	Must address sexual violence and harassment between children	Policy includes detailed procedures for responding to sexual violence and harassment, stating "Running Deer takes a zero-tolerance approach to all forms of child-on-child abuse" ...	Zero-tolerance approach with clear procedures
Standard 7 - Online Safety	Must address online safety including filtering and monitoring	Policy includes comprehensive online safety section stating "Running Deer has appropriate filtering and monitoring systems in place" and requires "The filtering and monitoring lead, Chris Hales, supported by the DSL and IT staff, will review our filtering and monitoring systems at least once every academic year" ...	Annual filtering/monitoring review
Standard 7 - Mobile Phones	Must have policy on mobile phone use (KCSIE 2026)	Policy states "Running Deer School is a mobile phone-free environment. Pupils do not have access to their mobile phones throughout the school day, including during lessons, breaktimes and lunchtimes. This is in line with DfE guidance on mobile phones in schools and KCSIE 2026" ...	Mobile phone-free environment
Standard 7 - Nudes/Semi-Nudes	Must address sharing of nudes/semi-nudes including AI-generated images	Policy comprehensively addresses "Making or sharing of nudes or semi-nudes (including AI-generated images)" with detailed procedures stating "All incidents involving the making or sharing	Includes AI-generated image risks



Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
		of nudes or semi-nudes must be treated as a safeguarding concern" ...	
Standard 7 - Missing Children	Must have procedures for children missing education	Policy states "A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority" ...	Missing children procedures included
Standard 7 - Prevent Duty	Must comply with Prevent Duty	Policy includes detailed section on radicalisation stating "The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism" ...	Comprehensive Prevent procedures
Standard 7 - FGM	Must address Female Genital Mutilation including mandatory reporting	Policy states "Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police" ...	Mandatory reporting duty explained
Standard 7 - Forced Marriage	Must address forced marriage	Policy defines forced marriage and states "Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014" ...	Forced marriage procedures included

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
Standard 7 - CSE	Must address Child Sexual Exploitation	Policy includes comprehensive CSE section with Devon Children and Families Partnership CSE Screening Tool procedures and states "The DSL will use the Devon Children and Families Partnership CSE Screening Tool on all occasions when there is a concern" ...	CSE screening tool and procedures
Standard 7 - County Lines	Must address criminal exploitation including county lines	Policy includes detailed section on "County Lines and Criminal Exploitation" stating "Where a professional believes a child to be involved in County Lines, there should be no delay in making a safeguarding referral" ...	County lines and CCE procedures
Standard 7 - Domestic Abuse	Must address domestic abuse	Policy includes section on domestic abuse stating "Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships" ...	Domestic abuse awareness and procedures
Standard 7 - Looked After Children	Must have arrangements for looked after children	Policy states "At Running Deer School, the designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Devon County Council's Virtual School Head for Children in Care" ...	Designated teacher and Virtual School liaison
Standard 7 - Record Keeping	Must keep detailed safeguarding records	Policy requires DSL to "keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child even if there is no need to make an immediate referral" and "ensure that all such records are kept confidential,	CPOMS system with retention until age 25

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
		stored securely and are separate from student records, until the child's 25th birthday" ...	
Standard 7 - Information Sharing	Must have procedures for information sharing when child moves school	Policy requires DSL to "ensure that when a child or young person leaves the school or service, relevant child protection information is passed to the new setting (separately from their main file) as soon as possible, ensuring secure transit and that confirmation of receipt is obtained" ...	Secure information transfer procedures
Standard 7 - Referrals	Must make referrals to appropriate agencies	Policy states DSL "Will refer a child or young person, if there are concerns about possible abuse, to Front Door (MASH) and act as a focal point for staff to discuss concerns. Enquiries must be followed up in writing, if referred by telephone" ...	Clear referral procedures to MASH
Standard 7 - Early Help	Must provide early help	Policy states "Running Deer provides a coordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans" ...	Early help procedures included
Standard 7 - Gender Identity	Must comply with KCSIE 2026 guidance on gender questioning children	Policy includes comprehensive section stating "Running Deer will only respond to a request to socially transition in school if it is raised by a child or their parent. We will never initiate such discussions or actions" and "Running Deer maintains single-sex spaces based on biological sex. This includes: Toilets, Changing rooms, Shower facilities. There are no exceptions to this requirement" ...	Full compliance with KCSIE 2026 gender guidance

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
Standard 7 - Allegations Against Staff	Must have procedures for allegations against staff	Policy states "If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Head of School or Centre Manager. The Head of School or Centre Manager on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO)" ...	LADO consultation procedures
Standard 7 - Low-Level Concerns	Must have procedures for low-level concerns (KCSIE 2026)	Policy includes comprehensive low-level concerns section defining them as "any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult working in or on behalf of Running Deer may have acted in a way that: Is inconsistent with the staff behaviour policy (code of conduct)" ...	Detailed low-level concerns procedures
Standard 7 - Whistleblowing	Must have whistleblowing procedures	Policy states "We recognise that children and young people cannot be expected to raise concerns in an environment where staff fail to do so" and provides NSPCC whistleblowing helpline: 0800 028 0285 ...	Whistleblowing procedures and helpline
Standard 7 - Physical Intervention	Must have policy on physical intervention	Policy states "We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be recorded and signed by a witness" ...	Physical intervention policy referenced

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
Standard 7 - Confidentiality	Must understand confidentiality and information sharing	Policy states "All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 are not barriers to sharing information where the failure to do so would place a child or young person at risk of harm" ...	Clear information sharing guidance
Standard 7 - Vulnerable Groups	Must recognise particularly vulnerable children	Policy includes comprehensive section stating "Running Deer recognises that some children and young people are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some" and lists vulnerable groups including SEND, mental health needs, young carers, looked after children ...	Recognition of vulnerable groups
Standard 7 - Contextual Safeguarding	Must consider contextual safeguarding	Policy states "Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the setting. All staff, but especially the Designated Safeguarding Lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding" ...	Contextual safeguarding approach
Standard 7 - Serious Violence	Must address serious violence	Policy includes section on serious violence stating "All staff should be aware of the indicators that children may be at risk from, or are involved in, serious violent crime" with detailed risk factors and indicators ...	Serious violence procedures

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
Standard 7 - Private Fostering	Must be aware of private fostering	Policy defines private fostering and states "where a member of staff becomes aware that a student may be in a private fostering arrangement they will raise this will the DSL and the DSL will notify Front Door (MASH) of the circumstances" ...	Private fostering notification procedures
Standard 7 - Young Carers	Must identify and support young carers	Policy includes section on young carers stating "Where staff identify a child as a young carer, they will inform the DSL who will consider whether an early help assessment would be appropriate and what support can be offered" ...	Young carers identification and support
Standard 7 - Medical Conditions	Must safeguard children with medical conditions	Policy states "Children with medical conditions may be more vulnerable to abuse, neglect or exploitation" and requires staff to be alert to signs that medical needs are not being met ...	Medical conditions safeguarding
Standard 7 - Honour-Based Violence	Must address honour-based violence	Policy defines honour-based violence and states it "can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour" ...	HBV procedures included
Standard 7 - One Chance Rule	Must understand one chance rule	Policy states "All staff are aware of the 'One Chance Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have 'one chance' to speak to a child or young person who is a potential victim and have just one chance to save a life" ...	One chance rule awareness



Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
Standard 7 - Upskirting	Must address upskirting	Policy defines upskirting as "when someone takes a picture under a person's clothing with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause humiliation, distress or alarm" ...	Upskirting included in policy
Standard 7 - AI and Technology Risks	Must address AI-generated content risks (KCSIE 2026)	Policy includes section on "Safeguarding Risks of Generative AI and Technology" stating "AI-generated content, including deepfake images and videos, can be used to harm, exploit or abuse children. Children may create, share or be victims of AI-generated nudes or semi-nudes" ...	AI and deepfake risks addressed
Standard 7 - Harmful Sexual Behaviour	Must understand harmful sexual behaviour continuum	Policy states "Running Deer recognises that harmful sexual behaviour (HSB) exists on a continuum which may escalate into sexual harassment and sexual violence" and distinguishes between developmental, inappropriate, and harmful/abusive behaviour ...	HSB continuum understanding
Standard 7 - Board Oversight	Governing body must ensure compliance	Policy states Board of Directors must ensure "Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with Devon Children and Families Partnership and statutory requirements, are reviewed annually" ...	Annual board review requirement
Standard 7 - Safer Recruitment	Must operate safer recruitment procedures	Policy requires Board to ensure "Running Deer operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by	Safer recruitment procedures

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
		association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training" ...	
Standard 7 - DBS Checks	Must ensure appropriate DBS checks	Policy requires "all staff working within our school, who have substantial access to children, have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and a single central record is kept for audit" ...	DBS checks and SCR maintained
Standard 7 - Volunteers	Must ensure enhanced DBS for volunteers in regulated activity	Policy states "all volunteers who frequently teach, train, instruct or supervise children receive enhanced DBS checks with children's barred list information, as they are in regulated activity under The Crime and Policing Act 2026" ...	Enhanced DBS for volunteers (Crime and Policing Act 2026)
Standard 7 - Directors' DBS	Directors must have enhanced DBS checks	Policy requires "Enhanced DBS checks (without barred list checks, unless the Director is also a volunteer at the school) are in place for all Directors" ...	Directors' DBS checks
Standard 7 - Part 2 KCSIE	Directors must be given Part 2 of KCSIE	Policy states "All Directors will be given a copy of Part 2 of Keeping Children Safe in Education (KCSIE) 2026" ...	Part 2 KCSIE for Directors
Standard 7 - S175/157 Audit	Must complete annual safeguarding audit	DSL must "contribute to and provide, with the Head of School and Board of Directors, the 'Audit of Statutory Duties and	Annual S175/157 audit

Independent School Standard	Requirement	How the Policy Meets This Standard	Evidence from Policy
		Associated Responsibilities' (S175/157 audit) to be submitted annually to the Education Safeguarding Team" ...	
Standard 7 - Multi-Agency Working	Must work with other agencies	Policy requires DSL to "liaise with the Local Authority and work with other agencies and professionals in line with Working Together to Safeguard Children" and "ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings" ...	Multi-agency working procedures
Standard 7 - CPOMS Monitoring	Must ensure safeguarding records are checked	Policy states "We ensure all CPOMS records are checked by two Level 3 Safeguarding trained members of staff" ...	Dual checking of safeguarding records

Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
SAFEGUARDING (Stand-alone judgement: Met/Not Met)			
Safeguarding Culture	Leaders and staff create a culture of safeguarding where pupils feel safe	Policy states "To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to"	Comprehensive safeguarding culture embedded
Safeguarding - KCSIE Compliance	All staff must read KCSIE Part 1 (2026) in full	Policy requires "All staff and volunteers read KCSIE Part 1 (2026) in full annually and sign to say they read and understood it. There is no longer a condensed version - all staff must read Part 1 in its entirety"	Full KCSIE 2026 compliance
Safeguarding - DSL	DSL must be member of SLT with appropriate training	Policy states "The Designated Safeguarding Lead (DSL) for Running Deer School is Geraldine Carter, Head of School" and "Holds ultimate responsibility for safeguarding and child protection in the school or Intervention Services and is a member of the SLT" with "updates at least every two years"	DSL is SLT member with required training
Safeguarding - Staff Training	All staff receive regular safeguarding training	Policy requires "All staff receive safeguarding and child protection training, including online safety, at induction in line with advice from Devon Children and Families Partnership which is regularly updated (for example, via email, e-bulletins and staff meetings), as required, but at least annually"	Annual minimum training requirement



Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
Safeguarding - Reporting Culture	Pupils know how to report concerns and feel they will be listened to	Policy creates "a culture and ethos of respect, tolerance, acceptance and diversity that makes it easier for pupils to call out incidents" and states "We encourage pupils to call out and report anything that makes them uncomfortable, no matter how 'small' they think it is"	Strong reporting culture established
Safeguarding - Child-on-Child Abuse	School has procedures for child-on-child abuse including sexual violence and harassment	Policy includes comprehensive section stating "The DSL, Governing Body/Board of Directors and Head Teacher will take due regard to Part 5, KCSIE 2026" with "zero-tolerance approach to all forms of child-on-child abuse"	Detailed child-on-child abuse procedures
Safeguarding - Online Safety	Appropriate filtering and monitoring systems in place, reviewed annually	Policy states "The filtering and monitoring lead, Chris Hales, supported by the DSL and IT staff, will review our filtering and monitoring systems at least once every academic year"	Annual filtering/monitoring review (2026/27 requirement)
Safeguarding - AI Risks	Understanding of AI-generated content risks (KCSIE 2026)	Policy includes section on "Safeguarding Risks of Generative AI and Technology" stating "AI-generated content, including deepfake images and videos, can be used to harm, exploit or abuse children"	AI and deepfake risks addressed
Safeguarding - Mobile Phones	Mobile phone policy in line with KCSIE 2026	Policy states "Running Deer School is a mobile phone-free environment. Pupils do not have access to their mobile phones throughout the school day, including during lessons, breaktimes and lunchtimes. This is in line with DfE guidance on mobile phones in schools and KCSIE 2026"	Mobile phone-free environment

Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
Safeguarding - Mental Health Risks	Leaders identify pupils at risk including mental health issues (2026/27 update)	Policy recognises "children questioning their gender may be potentially vulnerable in terms of mental health and psychosocial needs" and includes "Staff will be alert to the signs that a child may be a young carer, which may include: Behavioural problems or withdrawal, Low self-esteem or anxiety"	Mental health vulnerabilities identified
Safeguarding - Eating Disorders, Self-Harm, Suicide Ideation	Specific awareness of mental health risks that could develop into safeguarding concerns (2026/27 update)	Policy states staff should be aware of indicators including "Mood swings, volatile behaviour, emotional distress, Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders"	Specific mental health risks covered
Safeguarding - Serious Violence	Staff aware of indicators of serious violence risk	Policy includes comprehensive section stating "All staff should be aware of the indicators that children may be at risk from, or are involved in, serious violent crime" with detailed indicators and risk factors	Serious violence procedures included
Safeguarding - Record Keeping	Detailed safeguarding records kept securely	Policy requires DSL to "keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child even if there is no need to make an immediate referral" with records kept "until the child's 25th birthday"	CPOMS system with dual checking
Safeguarding - Low-Level Concerns	Procedures for low-level concerns (KCSIE 2026)	Policy includes comprehensive low-level concerns section defining them as "any concern – no matter how small, and even if no more than a 'nagging doubt'" with detailed recording and review procedures	Detailed low-level concerns framework

Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
Safeguarding - Whistleblowing	Staff know how to raise concerns about safeguarding practice	Policy states "All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection" with NSPCC whistleblowing helpline: 0800 028 0285	Whistleblowing procedures and helpline
Safeguarding - Safer Recruitment	Appropriate recruitment checks including DBS	Policy requires "all staff working within our school, who have substantial access to children, have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and a single central record is kept for audit"	Safer recruitment and SCR maintained
Safeguarding - Volunteers	Enhanced DBS for volunteers in regulated activity (Crime and Policing Act 2026)	Policy states "all volunteers who frequently teach, train, instruct or supervise children receive enhanced DBS checks with children's barred list information, as they are in regulated activity under The Crime and Policing Act 2026"	Crime and Policing Act 2026 compliance
Safeguarding - Gender Identity	Compliance with KCSIE 2026 guidance on gender questioning children	Policy states "Running Deer will only respond to a request to socially transition in school if it is raised by a child or their parent. We will never initiate such discussions or actions" and "Running Deer maintains single-sex spaces based on biological sex. This includes: Toilets, Changing rooms, Shower facilities. There are no exceptions to this requirement"	Full KCSIE 2026 gender guidance compliance
Safeguarding - Fire Safety	Fire safety concerns considered when evaluating safeguarding culture (2026/27 update)	While not explicitly detailed in safeguarding policy, school would need to demonstrate fire safety procedures are in place and any serious concerns would be reported to fire rescue service	Would need to be evidenced during inspection



Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
Safeguarding - Adults on Premises	Risk assessment if adults live on premises (2026/27 update)	Policy does not specifically address this, but states school will "ensure that all staff working within our school, who have substantial access to children, have been checked as to their suitability"	Would need additional risk assessment if applicable
INCLUSION			
Inclusion - Engagement with Families	Leaders engage proactively and in a timely manner with pupils and families to reduce barriers (2026/27 update - 'expected standard')	Policy states "We aim to work closely with students and their families in order to best meet their needs and to help them to manage their behaviour" and "Parents and carers have the responsibility to let school know if there has been a change in circumstances which might affect their child"	Proactive family engagement embedded
Inclusion - Vulnerable Groups	Identifying and supporting vulnerable pupils	Policy states "Running Deer recognises that some children and young people are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some" with comprehensive list of vulnerable groups including SEND, mental health needs, young carers, looked after children	Comprehensive vulnerable groups identification
Inclusion - SEND Support	High-quality support for pupils with SEND	Policy recognises "All staff need to understand the students, their needs relating to attachment, trauma, or SEND, and need to maximise opportunities for students to achieve success and have positive outcomes"	SEND needs integrated into safeguarding
Inclusion - Young Carers	Identifying and supporting young carers	Policy includes dedicated section stating "Where staff identify a child as a young carer, they will inform the DSL who will consider	Young carers identification and support

Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
		whether an early help assessment would be appropriate and what support can be offered"	
Inclusion - Looked After Children	Appropriate support for looked after children	Policy states "At Running Deer School, the designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Devon County Council's Virtual School Head for Children in Care"	Designated teacher and Virtual School liaison
Inclusion - Children Missing Education	Procedures for children missing education	Policy states "A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority"	Missing children procedures
Inclusion - Early Help	Coordinated offer of early help	Policy states "Running Deer provides a coordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans"	Early help procedures embedded
ACHIEVEMENT			
Achievement - Inclusive Achievement	Pupils with barriers to learning achieve well (2026/27 update)	Policy aims "To support the child's development in ways that will foster security, confidence and independence" and recognises need to support children with "attachment, trauma, or SEND" to achieve success	Support for achievement despite barriers

Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
Achievement - Progress from Starting Points	Pupils make progress from their starting points (2026/27 update)	Policy states school will "provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school and Intervention Services, contribute to assessments of need and support packages for those children"	Monitoring and support for progress
ATTENDANCE AND BEHAVIOUR			
Attendance - SEND Impact Recognition	Recognising SEND can affect attendance (2026/27 update)	Policy recognises vulnerable children may have "Attendance at school" affected and states "Staff will be alert to the signs that a child may be a young carer, which may include: Tiredness or lateness, Poor school attendance or punctuality"	SEND and other factors affecting attendance recognised
Attendance - Missing Children	Monitoring and responding to absence	Policy states "Attendance, absence and exclusions are closely monitored. Running Deer will hold more than one emergency contact number for each child or young person when reasonably possible"	Attendance monitoring procedures
Behaviour - Child-on-Child Abuse	Zero-tolerance approach to child-on-child abuse	Policy states "Running Deer takes a zero-tolerance approach to all forms of child-on-child abuse and recognises that all such abuse is unacceptable and will be taken seriously"	Zero-tolerance approach explicit
Behaviour - Sexual Violence and Harassment	Procedures for sexual violence and harassment	Policy includes detailed procedures stating "When we receive a report of sexual violence or sexual harassment between pupils, we will follow a clear process. Our Designated Safeguarding Lead (DSL) will conduct a risk assessment"	Comprehensive sexual violence/harassment procedures



Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
Behaviour - Bullying	Anti-bullying procedures including cyberbullying	Policy states "Our policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying (including misogyny and misandry)"	All forms of bullying addressed
PERSONAL DEVELOPMENT AND WELLBEING			
Personal Development - Healthy Relationships	Teaching about healthy relationships and consent	Policy states RSE curriculum covers "Consent – what it means, how to give it, how to recognise when it's not present, and understanding that consent can be withdrawn at any time, What respectful behaviour looks like in friendships and relationships"	Comprehensive RSE curriculum
Personal Development - Online Safety	Teaching pupils to keep themselves safe online	Policy states "Children are taught to understand and manage risk through our person, social, health and economic (PHSE) education and Relationship and Sex Education and through all aspects of their time at Running Deer. This includes online safety"	Online safety teaching embedded
Personal Development - Fundamental British Values	Promoting fundamental British values	Policy addresses Prevent duty stating "Opportunities are provided in the curriculum to enable children and young people to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)"	British values promoted through curriculum



Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
Personal Development - Prevent Duty	Understanding and preventing radicalisation	Policy includes comprehensive Prevent section stating "The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism"	Full Prevent duty compliance
Personal Development - Equality and Diversity	Promoting equality and tackling discrimination	Policy states "All children and young people regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities"	Equality embedded in policy
LEADERSHIP AND GOVERNANCE			
Leadership - Safeguarding Arrangements	Effective safeguarding arrangements in place	Policy demonstrates comprehensive safeguarding arrangements with DSL, DDSL, training, procedures, and Board oversight	Comprehensive safeguarding leadership
Leadership - Board Oversight	Board ensures safeguarding compliance	Policy states Board must ensure "Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with Devon Children and Families Partnership and statutory requirements, are reviewed annually"	Annual board review and oversight
Leadership - S175/157 Audit	Annual safeguarding audit completed	DSL must "contribute to and provide, with the Head of School and Board of Directors, the 'Audit of Statutory Duties and	Annual S175/157 audit

Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
		Associated Responsibilities' (S175/157 audit) to be submitted annually to the Education Safeguarding Team"	
Leadership - Policy Review	Policies reviewed regularly	Policy states "This policy will be reviewed annually or sooner if there are changes to legislation or guidance"	Annual policy review
Leadership - Multi-Agency Working	Working with other agencies	Policy requires DSL to "liaise with the Local Authority and work with other agencies and professionals in line with Working Together to Safeguard Children" and "ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings"	Multi-agency working embedded
Leadership - Contextual Safeguarding	Understanding contextual safeguarding	Policy states "Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the setting. All staff, but especially the Designated Safeguarding Lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding"	Contextual safeguarding approach
Leadership - Professional Curiosity	Staff exercise professional curiosity	Policy states "Children and young people may not be ready to disclose abuse because they may be embarrassed, scared or there may be a language barrier etc, but this should not prevent staff from exercising a professional curiosity, seeking further information and speaking to the DSL"	Professional curiosity embedded
Leadership - Information Sharing	Appropriate information sharing	Policy states "All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data	Information sharing guidance clear

Ofsted Evaluation Area	Inspection Focus / Standard	How the Safeguarding Policy Meets This	Evidence from Policy
		Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 are not barriers to sharing information where the failure to do so would place a child or young person at risk of harm"	