SAFEGUARDING & CHILD PROTECTION POLICY

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TABLE OF CONTENTS

1. Purpose 4
2. Definitions 5
3. Scope 6
4. The Policy 6
5. Implementation 8
Children who may be particularly vulnerable 8
Safeguarding pupils with SEND and autism 8
Children who have a social worker 9
Safeguarding children with medical conditions 9
Children who are questioning their gender 9
6. Roles and Responsibilities 10
All School Staff 10
The Co-Headteacher 12
The Role of the Governing Body 13
The Role of the Designated Safeguarding Lead (DSL) 15
7. The Deputy Designated Safeguarding Lead (DDSL) 18
8. Related policies and procedures 18
Anti-Bullying/Cyberbullying 18
ICT Acceptable Use 18
Accident and Incident reporting 18
Pupil Attendance 18
Behaviour Management 19
Complaints 19
Equality and Diversity 19
Personal and Intimate Care 19
Online Safety 19
Health & Safety 20
Safe Recruitment 20
Pupil Security & Missing Pupil 20
Staff Code of Conduct 20
Concerns and Whistleblowing 20
9. School Procedures 21
10. Confidentiality, Sharing and Withholding Information. 22
11. Reporting and Recording 23
12. Educating children about issues (PSHE & RSE) 25
13. Safeguarding Adults 25
14. Protecting Pupils from Unsuitable People 27
Child on Child Abuse (including harassment and violence) 27
Sharing Self-Generated Intimate Images 29
Child Sexual Exploitation (CSE) 30
Radicalisation and Extremism 31
Child Criminal Exploitation (CCE) and Gangs 32
Serious Violence 33
So-called Honour Based Abuse (HBA) 33
Female Genital Mutilation (FGM) 34
Forced Marriage 34
Domestic Abuse 35
Private Fostering Arrangements 35
Looked After Children and Previously Looked After Children 36
Children Missing Education (CME) 36
15. Pupils Missing Out On Education (PMOOE) 37
16. Supporting pupils where there has been harm 37
17. Appointment of Staff 38
18. Physical Contact with Pupils / Restraint 38
19. Safeguarding Concerns and Allegations Against Staff 39
20. Policy Review 40
21. Version History 41

22. Related Legislation, Guidance & Supporting Documents 42
23. Related Internal Documentation 43
APPENDIX 1 – Types of Abuse, Neglect and Exploitation 44
Abuse 44
Physical Abuse 44
Emotional Abuse 44
Sexual Abuse 44
Neglect 44
Indicators of abuse, neglect and exploitation 45
APPENDIX 2 - Safeguarding: Mark or Bruise – unknown cause 47
APPENDIX 3 – Intimate Care 48
Intimate Care Procedures 48
APPENDIX 4 – Safeguarding Policy Pupil Page 49

1. Purpose

1.1 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 and in line with statutory guidance: 'Working Together to Safeguard Children' 2026, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if you are Worried a Child is Being Abused' 2015. This policy also reflects, both statutory guidance 'Keeping Children Safe in Education 2026' (KCSIE) and Surrey Safeguarding Children's Partnership (SSCP) Procedures. The policy should be read alongside the 'Surrey Safeguarding Adults policy and procedures'.

1.2 The school recognises that safeguarding applies to all children, including those living with their birth families, those in kinship care, adopted children, and looked after children. Safeguarding considerations also apply to unborn children where concerns are identified, ensuring early intervention and protection.

1.3 The Governing Body and School Management Team (SMT) take seriously their responsibilities under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure robust arrangements within our school to identify, assess, and support those pupils who are suffering or may be at risk of harm.

1.4 Jigsaw School recognises that all adults, including temporary staff, consultants, volunteers and governors, have a full and active part to play in protecting our pupils from harm and abuse, and an equal responsibility to act immediately on any suspicion or report that may indicate a pupil is at risk of harm, either in the school or in the community, taking into account contextual safeguarding in accordance with statutory guidance. The pupil's welfare is our paramount concern.

1.5 All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual pupil.

1.6 Jigsaw School acknowledges that working in partnership with other agencies protects pupils and reduces risk, therefore Jigsaw School will engage in partnership working to protect and safeguard the pupils.

1.7 Whilst Jigsaw School will work openly with parents/guardians/carers as far as possible, we reserve the right to contact Social Care or the Police, without notifying parents/guardians/carers if this is believed to be in the pupil's best interests.

1.8 The aims of this policy are:

- To support the pupil's development in ways that will foster security, confidence and independence.
- To provide an environment in which pupils feel safe, secure, valued, respected, and confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to See Appendix 4
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard pupils and of their responsibilities in identifying and reporting possible cases of abuse, neglect and exploitation
- To ensure staff understand the different types of child abuse.

- To provide a systematic means of monitoring pupils known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those pupils.
- To emphasise the need for good levels of communication between all members of staff.
- To ensure all members of the school community are aware and adhere to the robust and structured procedures within the school related to suspected child abuse, neglect and exploitation.
- To develop and promote effective working relationships with other agencies, especially Early Help providers, the Police and Health and Social Care.
- To ensure that all staff working within our school and having access to pupils have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory Disclosure Barring Service enhanced check (Children's Barred List check) according to KCSIE guidance; and a single central record is kept by the Human Resources (HR) Team for audit.
- To ensure the school has procedures for dealing with allegations of abuse against members of staff, that comply with local authority agreed inter-agency procedures and DfE (Department for Education) guidance.
- To ensure the school complies with the Disqualification under the Childcare Act 2006 guidance last updated in August 2018.
- To ensure staff are aware of the role of the Designated Safeguarding Lead and Deputies.
- To provide support for both staff who have experienced a report from a pupil and for pupils who have made a report.
- To provide further training for staff and include discussion of child protection issues in the programme of induction for new staff.
- To ensure any identified deficiencies or weaknesses in regard to child protection arrangements are remedied without delay.

2. Definitions

2.1 **Safeguarding and promoting the welfare of pupils** is defined as:

- providing help and support to meet the needs of children as soon as issues emerge
- protecting pupils from maltreatment, whether that is within or outside the home, including online
- preventing impairment of pupil's mental and physical health or development
- ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes

2.2 **Child Protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to

suffer, significant harm.

2.3 **Adult Safeguarding** arrangements apply to pupils aged 18 or over who have a need for care or support.

2.4 'The Trust' means Jigsaw School, Jigsaw Plus, Jigsaw Trust and Jigsaw Trading 2013 Limited (Café on the Park)

2.5 'The school' and 'Jigsaw School' means Jigsaw CABAS® School

2.6 CABAS® is an acronym for Comprehensive Application of Behaviour Analysis to Schooling.

2.7 Co-Headteacher refers to the Co-Headteacher who has completed DSL training.

2.8 KCSIE means 'Keeping Children Safe in Education 2026' as referenced throughout this policy

2.9 SEND is an acronym for Special Educational Needs and Disabilities

2.10 DSL is an acronym for Designated Safeguarding Lead and where appropriate also refers to Deputy Designated Safeguarding Lead (DDSL).

2.11 SMT is an acronym for School Management Team

2.12 C -SPA refers to the Single Point of Access and the Child Protection Consultation Line.

2.13 SSCP refers to the Surrey Safeguarding Children Partnership

2.14 'Pupil' refers to all children and young adults who attend Jigsaw School

2.15 'Staff' refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

2.16 'Social Care' refers to Children's Services (Adult Services for pupils 18 years and over) in the area in which the pupil is resident, unless a child/young adult is a Child Looked After/Adult in supported living or residential setting then this will be the Children's Services (or Adult Services) in their home authority.

2.17 'Early Help' is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of an issue getting worse.

3. Scope

3.1 The Co-Headteachers will appoint a senior member of staff to act as the Designated Safeguarding Lead (DSL).

Jayne Lobley

3.2 The Co-Headteachers will also appoint deputy DSLs who will take on the role in the DSL's absence.

Billie Booker-Moniz
Meredith Wightman
Emma Hawkins

3.3 The governor responsible for Safeguarding and Child Protection

Victoria Woods

4. The Policy

4.1 Jigsaw CABAS® School is an independent special school which provides education for primary and secondary age children and young adults who hold an Educational Heath

Care Plan (EHCP) and have a diagnosis of autism and associated social and communication difficulties. The nature of their disability means that autistic pupils may not have sufficient understanding or awareness that certain behaviours directed towards themselves and others is not appropriate and may cause harm to themselves or others.

4.2 The School follows the Comprehensive Application of Behaviour Analysis to Schooling (CABAS®) methodology. The CABAS® system is designed to approve desired behaviours rather than disapprove undesired behaviours. The curriculum is designed to emphasise teaching through positive reinforcement. The CABAS® system uses the principles of positive reinforcement by identifying effective forms of reinforcement and the manipulation of intermittent and other schedules of reinforcement. The creation of pupil motivation is essential to the implementation of the principles of positive reinforcement within the CABAS® system.

4.3 The School adheres to the principles outlined in the Children Act 1989, updated 2004, believing that all children have a right to be protected from abuse, neglect and exploitation. It is the intention of the procedures within this policy to ensure that the appropriate action is taken immediately where it is alleged that a pupil is suspected of being abused. The prime concerns at all times must be the welfare and safety of the pupil(s).

4.4 This policy forms part of the school's safeguarding responsibilities, which include the belief that all pupils are to be protected from maltreatment and grow up in circumstances consistent with the provision of safe and effective care. This policy will contribute to preventing the impairment of pupil's mental health or physical health or development and to take action to enable all pupils to have the best outcomes.

4.5 The school is committed to anti-discriminatory and anti-racist safeguarding practice. We recognise that discrimination, including that experienced by pupils with SEND and autism, can:

- increase vulnerability
- impact identification of harm
- influence professional responses

4.6 Staff are expected to actively recognise, challenge and record discrimination in all safeguarding work.

4.7 Safeguarding is embedded across the curriculum, including PSHE, providing opportunities which equip pupils with the skills they need to stay safe from harm and to know to whom they should turn to for help. In particular this will include topics such as anti-bullying, online safety, road safety, and preparation for transition to adulthood.

4.8 The School expects all staff, governors and volunteers to share this commitment to these safeguarding principles and responsibilities.

4.9 This policy document will be reviewed annually. Staff will be asked to evaluate the training procedures and the effectiveness of the procedures whenever they have had occasion to put them into practise.

5. Implementation

Children who may be particularly vulnerable

5.1 Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse, neglect and exploitation can occur.

5.2 Pupils with SEND and certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children, which can include:

- Assumptions that indicators of possible abuse, neglect and exploitation such as behaviour, mood and injury relate to the pupil's disability without further exploration
- The potential for pupils with SEND being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties to overcome these barriers
- Being unable to understand the difference between fact and fiction in online content and then repeating the content and/or behaviours in school or in the community and not understanding the consequences of doing so
- Some pupils may not feel ready, or know how to, or not be able to tell someone they are being abused, exploited or neglected, and/or they may not recognise these experiences as harmful. This may be due to their vulnerability, disability and/or sexual orientation or language barriers.

5.3 Staff are trained to manage these additional barriers to ensure the pupils at Jigsaw School are appropriately safeguarded.

5.4 Further information on how to support pupils with SEND can be found from specialist organisations such as:

The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service at (councilfordisabledchildren.org.uk)

Mencap - Represents people with learning disabilities, with specific advice and information for people who work with these children and young people.

NSPCC - Safeguarding children with special educational needs and disabilities (SEND)

NSPCC - Safeguarding child protection/deaf and disabled children and young people

Safeguarding pupils with SEND and autism

5.5 The school recognises that pupils with SEND and autism:

- may experience multiple and overlapping risks (including exploitation and online harm)
- may be less likely to verbally communicate concerns
- may express distress through behaviour rather than words

5.6 Staff must:

- adapt all safeguarding practice to the pupil's communication needs
- avoid attributing concerns solely to a pupil's diagnosis
- ensure safeguarding plans align with Educational Health Care Plans (EHCPs), behaviour plans, and therapeutic approaches

5.7 Safeguarding responses must be individualised, neuro-informed and person-centred.

Children who have a social worker

5.8 Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse, neglect and/or complex family circumstances. The school recognises that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantaging them educationally.

5.9 When a child has a social worker, safeguarding is at the heart of every decision made, including how the school reacts to unauthorised absence or children missing education, which themselves carry additional safeguarding risks. When necessary, extra in-school support is offered to pupils and parents/carers who have a social worker.

5.10 The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and those previously looked after, such that they have the opportunity to meet their full educational potential. Where appropriate, the school works with the Virtual School to support these children.

Safeguarding children with medical conditions

5.11 Incidents relating to the management of a pupil's medical condition (including allergies) will not normally require a safeguarding referral. However, the school will consider a referral where concerns indicate that a child may be at risk of neglect, abuse, or exploitation because of their medical condition. This may include situations where important medical information is withheld from the school or where a child is repeatedly sent to school without essential medication, placing them at risk. Staff will follow the school's procedures for supporting pupils with medical conditions and report to the Designated Safeguarding Lead (DSL) should safeguarding concerns arise.

Children who are questioning their gender

5.12 The school recognises that some children and young people may question their gender and may require support, understanding and careful consideration. The welfare, wellbeing and safeguarding of the child will always be the primary consideration in any decision-making. Responses will be individualised and based on the child's age, needs, wishes, circumstances and best interests. Staff will listen respectfully, respond sensitively and avoid making assumptions, while remaining alert to any safeguarding concerns, vulnerabilities, mental health needs, bullying, online harms or other risks that may affect the child.

5.13 The school will normally work in partnership with parents/carers when supporting a child who is questioning their gender. However, where involving parents/carers could place a child at risk of significant harm, appropriate safeguarding procedures will be followed, and advice will be sought from the DSL. Any requests relating to social transition or other significant changes will be considered carefully on a case-by-case basis, with decisions informed by safeguarding considerations, professional judgement and, where appropriate, advice from relevant agencies. The school will take all reasonable steps to protect children who are questioning their gender from bullying,

harassment, discrimination, abuse and victimisation and will maintain appropriate records of concerns, decisions and support arrangements.

5.14 Pupils who are lesbian, gay, bisexual or questioning their gender or perceived to be, may be at greater risk of harm. Being lesbian, gay, bisexual or questioning their gender in itself does not put pupils at greater risk, but they may be targeted by their peers, or might not have a trusted adult they can talk to. Staff should help to create a safe space for pupils to speak out or share their concerns.

5.15 Other factors can contribute to an increased safeguarding risk, including, but not limited to:

- The pupil living away from home or living in temporary accommodation
- The pupil living in a chaotic and unsupportive home situation
- The pupil living a transient lifestyle where there are constant changes
- The pupil is affected by parental substance misuse, domestic violence or parental mental health needs
- Being vulnerable to being bullied, or engaging in bullying
- Being vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- The pupil does not have English as a first language
- Being at risk of sexual exploitation, female genital mutilation, forced marriage or becoming involved with or supporting terrorism
- The pupil has experienced multiple suspensions and is at risk of, or has been permanently excluded from school
- The pupil has a parent or carer in custody or is affected by parental offending.
- The pupil is frequently missing/goes missing from education, home or care.

5.16 A thorough administration process, assessments, meetings with parents and carers and communication with previous settings provide support with identifying pupils for which these further risks exist. The school provides high staff supervision and communication between school and home enabling an opportunity for provision of support as and when necessary. Pupils are monitored closely, and any concerns are highlighted to the safeguarding team. The safeguarding team will work closely with other professionals to ensure the pupils and their families receive the right support at the right time.

6. Roles and Responsibilities

All School Staff

6.1 All School Staff (including the DSL, Deputy, and Co-Headteachers) have a key role to play in identifying concerns early and in providing help for children. To achieve this, they will:

- Provide a caring, safe and positive environment in which pupils can learn. Establish and maintain an environment where pupils feel secure, are encouraged to talk and are listened to
- Ensure pupils know that there are adults in the school who they can approach if they are worried or have concerns

- All staff are aware that mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation. More information and guidance for staff in supporting pupils who may require mental health support can be found in the Mental health and behaviour in schools guidance. The school ensures only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education
- If staff have a mental health concern about a pupil that is also a safeguarding concern, immediate action will be taken, following our Safeguarding and Child Protection Policy and procedures and speaking to the Designated Safeguarding Lead or Deputy
- Plan opportunities within the curriculum for pupils to develop the skills they need to assess and manage risk appropriately and keep themselves safe
- Attend training in order to be aware of and alert to the signs of abuse, neglect and exploitation. Training will be delivered in various formats to enhance learning outcomes and staff supported to put their training into practice
- Maintain an attitude of "it could happen here" with regards to safeguarding, and understand that safeguarding is "everyone's responsibility"
- Know how to respond to a pupil who reports harm or abuse following training of 'Working together to Safeguard Children' (2026), 'What to do if you are worried a child is being abused' (2015) and KCSIE
- Know who the DSL and DDSL are and know how to contact them
- Record their concerns if they are worried that a pupil is being abused and report these directly to the DSL immediately that day. If the DSL is not contactable immediately the DDSL should be informed
- Follow the allegations procedures if the report is an allegation against a member of staff
- Report low-level concerns (as defined in KSCIE) about any member of staff/ supply staff or contractor to the Co-Headteacher or DSL. See Concerns Policy
- Be prepared to refer directly to the Children's Single Point of Access (C-SPA) and the Police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available
- Follow the procedures set out by the Children's Safeguarding Partnership and take account of guidance issued by the Department for Education
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan
- Treat information with confidentiality but never promising to 'keep a secret'
- Have an understanding of early help and be prepared to identify and support pupils who may benefit from early help

- Have an awareness of the role of the DSL and Deputy, the school's Safeguarding and Child Protection Policy, Behaviour Management Policy and Staff Code of Conduct, and procedures relating to the safeguarding response for children who are persistently absent or go missing from education
- Ensure that they do not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics) as stated in the Equality Act 2010. Further guidance can be found at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk)
- Challenge discrimination and bias, including where SEND or autistic behaviours are misunderstood
- Recognise that behaviour may communicate safeguarding concerns, and ensure pupils' voices are heard through adapted communication strategies
- Be mindful that the Teacher Standards states that teachers should safeguard pupil's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- Assist the Governing Body and Co-Headteachers in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance

The Co-Headteacher

6.2 In addition to the role and responsibilities of all staff the Co-Headteachers will ensure:

- The school fully contributes to inter-agency working in line with 'Working Together to Safeguard Children 2026' guidance
- The Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff. All staff are aware of the role of the designated safeguarding lead (DSL), including the identity of the DSL and Deputy
- That the school has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate support in place
- That the school's staff have appropriate knowledge of part 5 of the KCSIE guidance (child-on-child sexual violence and sexual harassment)
- That, where possible, all pupils are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and pupils are confident that this is the case. And that comprehensive records of all allegations are kept
- That there are procedures in place to also support staff who may be affected by sexual violence, sexual harassment and harmful sexual behaviour between pupils or where a pupil targets a staff member. It is important to distinguish between harmful sexual behaviour where a pupil lacks the capacity to understand the impact of their behaviour on a member of staff and the intentional sexual harassment of a member of staff by a pupil who has capacity. The Equality Act 2010 preventative duty does not apply to staff experiencing sexual harassment from pupils who lack the cognitive understanding to be considered to have committed a criminal offence
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including

the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children

- That opportunities are provided for a co-ordinated offer of early help when additional needs of pupils are identified
- The DDSL is trained to the same standard as the DSL and the role is explicit in their job description
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities
- Where there is a safeguarding concern that the pupil's wishes and feelings are considered when determining what action to take and what services to provide
- Child-centred systems and processes are in place for pupils to express their views and give feedback that take account of pupil's communication preferences
- 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
- Pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- That allegations or concerns against staff are dealt with in accordance with guidance from the Department for Education (DfE), Surrey Safeguarding Children's Partnership (SSCP) and Surrey County Council (SCC)
- That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a pupil; or if the person otherwise poses a risk of harm to a pupil
- They will record 'low level concerns' in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible

The Role of the Governing Body

6.3 All members of The Governing Body understand and fulfil their responsibilities to ensure that:

- There is a whole setting approach to safeguarding, involving everyone in the setting and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development
- A nominated governor for safeguarding is identified
- All members of the Governing body receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the setting are effective and support the delivery of a robust whole setting approach to safeguarding. Training should be regularly updated

- The school has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Code of Conduct, and a Behaviour Management Policy
- Policies are consistent with SSCP and statutory requirements, are reviewed annually (as a minimum) and updated as needed, as safeguarding issues y emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection Policy is available on the school's website
- The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections to Surrey County Council
- The school operates a safe recruitment procedure that includes statutory checks on staff suitability to work with children and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training
- At least one member of the governing body has completed safer recruitment training
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2026) part 1 and Annex A and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance
- The school has procedures for dealing with allegations of abuse against staff (including the Co-Headteachers), volunteers and against other pupils and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in a regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned
- A member of the SMT has been appointed by the Co- Headteachers as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description
- That on appointment, the DSL and DDSL undertake relevant training at the discretion of organisational needs, refreshed every two years as well as attending DSL network events, to refresh knowledge and skills
- Pupils are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and relationships and sex education (RSE)
- ensure that application filters and monitoring systems are in place and reviewed at least annually with records retained to safeguard pupils online, and staff training includes online safety, which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- The school complies with DfE and Surrey County Council Children Missing Education (CME) | Surrey Education Services(CME) requirements
- The school complies with regular data returns requested by the Local Authority, regarding all children, of statutory school/college age, attending alternative provision and/or on a reduced or modified timetable

- The school complies with the Charity Commission Safeguarding Guidance
- That clear systems and processes are in place for identifying possible mental health problems, which can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect or exploitation, including routes to escalate and clear referral and accountability systems
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors
- Any weaknesses identified in safeguarding policy and procedures are remedied immediately

The Role of the Designated Safeguarding Lead (DSL)

6.4 In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) in the school
- Have an 'it could happen here' approach to safeguarding
- Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children
- Refer cases where a crime may have been committed to the Police as required. The National Police Chiefs Council (NPCC) – 'When to Call the Police' should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do
- Manage and submit a Request for Support Form for a pupil if there are concerns about suspected harm or abuse, neglect or exploitation, to the Children's Single Point of Access (C-SPA), and act as a point of contact and support for school staff. Requests for support should be made securely by email to cspa@surreycc.gov.uk using the Request for Support Form urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line). Where pupils live outside of Surrey, referrals will be made as necessary to the relevant social care team
- Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, following the Prevent referral process and use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01865555618 for professionals and ask to speak to the Prevent Supervisor for Surrey. The Department of Education also has a dedicated telephone helpline for staff and governors to raise concerns around Prevent (02045666324 / 07901384401)
- Understand that the appropriateness of any filtering and monitoring system will be informed in part, by the risk assessment required by the Prevent Duty (Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk))
- Liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a pupil to the Disclosure and Barring Service and Teaching Regulation Agency, as required

- Follow DfE and KCSIE guidance on 'Child on Child Abuse' when a concern is raised that there is an allegation of a pupil abusing another pupil within the school
- When there has been a report of sexual violence, undertake an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and put in place as required
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community
- Encourage and promote a culture of listening to pupils and taking account of their wishes and feelings, amongst all staff
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually
- Have a secure working knowledge of SSCP procedures and those for other local authorities where necessary, understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements
- Have a clear understanding of access and referral to the local early help offer and support and advise members of staff where early help intervention is appropriate
- Understand and support the school delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting pupils from radicalisation
- Liaise with school staff (especially pastoral support, behaviour leads, and school health colleagues) on matters of safety and safeguarding and consult Surrey's Continuum of Support document (or the relevant local authority equivalent) to inform decision making and liaison with relevant agencies
- Be alert to the specific needs of children in need, those with Special Educational needs and Disability (SEND) and young carers
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep pupils safe whilst they are online at school; in particular understand the additional risks that pupils with SEND face online and the associated and appropriate support they require
- Work with the Co-Headteachers and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the setting
- Be able to keep detailed, accurate, secure records (either written or using appropriate secure online software) of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where

referrals were or were not made to another agency such as the local authority children or adult social care, or the Prevent program etc

- Ensure that when a child transfers setting (including in-year), their safeguarding/child protection file is passed to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. If the transit method requires that a copy of the safeguarding/child protection file is retained until such a time that the new setting acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting
- Report to the Co- Headteachers any significant issues for example, use of FaST Resolution Process enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation
- Ensure that all staff sign to say they have read, understood and agree to work within the School's Safeguarding and Child Protection Policy, Code of Conduct Policy and KCSIE Part 1 and Annex A and ensure that the policies are used effectively
- Organise child protection and safeguarding induction for all new staff, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keeping a record of attendance and address any absences
- Ensure that in collaboration with the school leadership and governors, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly
- Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm, abuse, neglect and exploitation will be made and the role of the school in this
- Establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements
- Contribute to and provide when requested, with the Co-Headteachers and Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections to Surrey County Council

- Ensure that the names of the Designated Safeguarding Lead and deputy, are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse, neglect and exploitation
- Provide a written report on safeguarding, including numbers and types of safeguarding reports, referrals to external agencies, training and other matters in advance of each Governing Body meeting
- Meet all other responsibilities as set out for DSLs in KCSIE

7. The Deputy Designated Safeguarding Lead (DDSL)

7.1 In addition to the role and responsibilities of all staff the DDSL will:

- Be trained to the same standard as the DSL and the role is explicit in their job description
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated
- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy will assume all of the functions of the DSL

8. Related policies and procedures

Anti-Bullying/Cyberbullying

8.1 Our Anti-bullying Policy is set out in a separate document and acknowledges that bullying is an unacceptable and anti-social behaviour which affects everyone and will not be tolerated. This includes all forms e.g. cyberbullying, prejudice-based and discriminatory bullying. We keep a record of known bullying incidents. The aim of the policy is to ensure that pupils learn in a supportive, caring and safe environment without fear of being bullied and to promote consistency of approach.

ICT Acceptable Use

8.2 Our ICT Acceptable Use Policy outlines procedures for data protection, monitoring and appropriate Internet/IT usage.

Accident and Incident reporting

8.3 Accident and incident reporting procedures are set out in a separate document under the Health and Safety Policy and specify procedures for incidents and accidents.

Pupil Attendance

8.4 Our Pupil Attendance Policy is set out in a separate document and outlines how attendance, absence and exclusions are closely monitored, and how the school responds to children missing in education. A pupil who is persistently absent from education, including persistent absences for part of the school day, or missing from education is a potential indicator of abuse, neglect and exploitation, including sexual abuse and sexual exploitation. The DSL and School Management Team (SMT) will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where pupils go missing on repeated occasions and/or are missing for periods during the school day. Staff must be alert to signs of pupils at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Behaviour Management

8.5 Our Behaviour Management Policy, updated in line with Behaviour in Schools (DfE, 2024) is set out in a separate document and acknowledges that staff must only use physical intervention as a last resort, when a pupil is endangering themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

- Such events are recorded on the SchoolPod online system
- Staff who are likely to need to use physical intervention will be appropriately trained in the PROACT-SCIPr-UK® technique

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

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

Complaints

8.8 There is a separate Complaints Policy which has a procedure specifically designed for our pupils. Pupils are made aware of this during PHSE sessions.

Equality and Diversity

8.9 Our Equality and Diversity Policy is set out separately and acknowledges that repeated incidents or a single serious incident might lead to consideration under safeguarding procedures. We keep a record of such incidents.

Personal and Intimate Care

8.10 Our Personal and Intimate Care Policy is set out separately and acknowledges that autistic pupils may not have sufficient understanding or awareness that certain behaviours directed towards themselves and others is not appropriate, and anyone involved with their personal and intimate care needs to be sensitive to their individual needs. See Appendix 3.

Online Safety

8.11 Our Online Safety Policy is set out as a separate document and outlines procedures in place for pupils and staff use to optimise safety and security when accessing the Internet.

8.12 Some adults and other children use technologies to harm children. The harm may range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in criminal, extremist or sexual behaviour such as webcam photography or face-to face meetings

8.13 Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist or misogynistic behaviour, criminal activity, suicide or eating disorders.

8.14 Pupils are taught about online safety throughout the curriculum in line with the Department for Education advice The online safety co-ordinator is Jayne Lobley (DSL).

Health & Safety

8.15 Our Health & Safety Policy is set out in a separate document and reflects the consideration we give to the protection of our pupils both physically within the school environment, and away from the school when undertaking school trips and visits.

Safe Recruitment

8.16 Our Safe Recruitment Policy is set out in a separate document, which fulfils all of the requirements of employment law, equality of opportunity and the needs of recruitment in a school for those with special educational needs. Procedures followed in the recruitment process describe safe recruitment practice in the appointment of staff (see Section 17).

Pupil Security & Missing Pupil

8.17 Our Pupil Security and Missing Pupil Procedures are set out in the Trust Site Access and Security Policy. This outlines the systems we have in place to maximise security of the school premises and procedures in place should a pupil go missing.

Staff Code of Conduct

8.18 This policy sets out clear guidance on the standards of behaviour expected from all staff at the Trust. The principles underlying the guidance aim to encourage staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring. This includes advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

Concerns and Whistleblowing

8.19 We recognise that pupils cannot be expected to raise concerns in an environment where staff fail to do so. The school adopts a concerns procedure and a whistleblowing procedure. Whistleblowing is the term used when someone who works in or for an organisation wishes to raise concerns about malpractice in the organisation (for example, crimes, civil offences, miscarriages of justice, dangers to health and safety or the environment), and the cover up of any of these. Whistleblowing is very different from a complaint or a grievance. It only applies when the individual has no vested interest and is acting as a witness to misconduct or malpractice that has been observed.

8.20 A concern is anything, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that suggests an adult working in or on behalf of Jigsaw may have acted in a way that is inconsistent with Jigsaw's policies and procedures, including inappropriate conduct outside of work.

8.21 All staff should be aware of the Whistleblowing Policy and Concerns Policy and their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO

8.22 Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold, as stated in KCSIE, are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse, neglect and exploitation; and ensure that adults working in or on behalf of the school

are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

8.23 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 0800 to 2000 Monday to Friday or email: help@nspcc.org.uk.

9. School Procedures

9.1 New members of staff meet with the DSL or DDSL within 2 weeks of starting as part of their induction training and a specific and a thorough safeguarding and child protection presentation is shared with them, as well as the requirement to read legislation relating to keeping children and young adults safe. Online Prevent training is also undertaken as part of the induction. All staff are asked to read the School's Safeguarding & Child Protection Policy prior to attending interview, and again as part of the induction process. All volunteers, temporary staff, work experience students and consultants receive a copy of the Safeguarding & Child Protection policy and meet with the DSL or deputy. A copy of the School's Safeguarding & Child Protection Policy is on the school website, and the staff common drive. Paper copies are kept on the Safeguarding Board in the staffrooms, and the DSL Office. Training for all staff is arranged as required through inset days and staff meetings.

9.2 The DSL and DDSL receive mandatory training every 2 years, provided by, and alternating between Surrey County Council Safeguarding or the National Association of Special Schools (NASS). This takes place face to face or virtually and provides the DSL and DDSL with updates in line with KCSIE, as well as enhancing knowledge and skills to enable them to lead a culture of safeguarding and promoting the welfare of pupils within the school. As well as this mandatory training the DSL and DDSL ensure their knowledge and skills are refreshed at regular intervals but at least annually through various external training providers. All staff receive regular safeguarding and child protection updates (for example, via email, staff meetings and through the staff communication platform, MyJigsaw) as required, but at least annually.

9.3 If a member of staff suspects, spots signs or indicators of abuse, neglect and exploitation, or has concerns a pupil may be at risk or is approached by a pupil that suggests a safeguarding concern the DSL must be informed immediately. The member of staff will meet with the DSL who will decide whether there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL or deputy is not immediately available. The DSL will decide whether to contact the local Children's Single Point of Access (C-SPA) either for advice or referral, and complete appropriate recording forms through the C-SPA, website to provide an accurate account of any discussions or observations regarding the pupil concerned. Any records are stored confidentially on a secure drive on the school's computer system, on the CPOMS system (web- based Management Information System) with restricted access to the safeguarding team only, or in a separate locked child protection file. The Co-Headteachers will be informed at this stage.

9.4 If a pupil is in immediate danger the DSL or Co-Headteacher will call the police.

9.5 If a pupil approaches a member of staff, they should be guided by the following:

- Listen to the pupil rather than directly question them. Nod and make reassuring noises but do not ask leading questions. Leading questions may invalidate your

evidence (and the pupil's) in any later prosecution in court. Reassure the pupil, but only so far as is honest and reliable

- Show the pupil you care through your facial and body language but do not initiate physical contact
- Never stop the pupil who is freely recalling events. Give the pupil time, do not hurry them, and do not ask the pupil to repeat it all for another member of staff
- Stay calm
- Explain that you want to help, and you must tell someone who will know what to do
- Make a note of the discussion using the pupil's own words as soon as practicable, not what you think they were implying
- Share concerns with the DSL immediately
- If you are not able to contact the DSL or deputy, and the pupil is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly
- If you are dissatisfied with the level of response that you receive following your concerns, you should press for re-consideration

9.6 Relevant information is shared confidentially with the member of staff who was approached by the pupil to reassure them that action is being taken to protect the pupil. If that member of staff does not receive this information, they should seek it out. Other staff are then informed on a need-to-know basis that the pupil is having a few problems that are being dealt with by the DSL.

9.7 The DSL, Social Services and the Co-Headteachers will discuss a plan of action according to each individual situation.

9.8 Being approached by a pupil can be upsetting for the member of staff, and staff members may need reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately. Staff should be encouraged to recognise that reports can have an impact on their own emotions and seek additional support as needed. The safeguarding team and/or HR Department will ensure staff have access to the Employee Assistance Programme and associated counselling services for further support if necessary.

9.9 Further advice on handling reports from children is available through Surrey County Council's website.

10. Confidentiality, Sharing and Withholding Information.

10.1 All matters relating to child protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2024) guidance.

10.2 Information will be shared with staff within the school who 'need to know'. Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information, in line with the Trust Data Protection Policy.

10.3 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 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There

is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

10.4 If a pupil requests confidentiality, they must be told that this cannot be promised, and it should be explained that staff have a responsibility to share information with those adults who will be able to help protect them from harm. The pupil should be reassured that only staff who need to know will be told. This could result in the pupil not wanting to continue the conversation, in which case the pupil should be informed that the matter will be reported to the DSL.

10.5 Staff should take care not to discuss information given in confidence outside the appropriate professional contexts.

10.6 The Department for Education Data Protection guidance for schools will help staff, governors and trustees understand how to comply with data protection law, develop data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

10.7 The school recognises strengthened expectations for timely, proportionate and lawful information sharing to safeguard children.

10.8 Information sharing will be used to:

- identify patterns of harm
- support multi-agency decision-making
- address potential disproportionality affecting vulnerable groups, including SEND pupils

11. Reporting and Recording

11.1 The following procedures apply to all staff working in the School and will be covered in training to enable staff to understand their role and responsibilities.

11.2 The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a pupil is being harmed or abused or is at risk of harm, abuse, neglect or exploitation.

11.3 The prime concern at all stages must be the interests and safety of the pupil.

11.4 All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in pupils who have limited mobility.

11.5 If a member of staff suspects abuse, neglect or exploitation, or spots signs or indicators of this, or they are approached by a pupil they must:

11.6 Contact a member of the safeguarding team as soon as possible, if not immediately

11.7 Make an initial record of the information related to the concern as soon as possible on CPOMS including details of:

- Time
- Place
- Who was present
- Context

- Details of concern (using the pupil's words)
- Demeanour/non-verbal behaviours of the child
- Any injuries
- Rationale for decision making
- Actions taken

11.8 All safeguarding records should include where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc.

11.9 The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

11.10 In the absence of the DSL or DDSL, staff must be prepared to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

11.11 Following a report of concerns, using the Continuum of Support document for guidance, the DSL must decide whether or not there are sufficient grounds for suspecting harm. In which case, a request for support must be made to the C-SPA and the Police if it is appropriate.

11.12 The setting should try to discuss any concerns about a pupil's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the pupil at increased risk or could impede a Police investigation. Where there are doubts or reservations about involving the pupil's family, the DSL should clarify with the C-SPA or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The pupil's views should also be considered.

11.13 If it is suspected that a pupil is suffering, or is likely to suffer, harm, abuse, neglect or exploitation the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.

11.14 When a pupil needs urgent medical attention and there is suspicion of abuse, neglect or exploitation the DSL should take the pupil to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

11.15 The exception to this process will be in those cases of known FGM where there is a mandatory reporting duty for the teacher to report directly to the Police where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe 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 that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth
- The DSL should also be made aware

11.16 A mark, bruise, or sign of physical injury first observed during school hours, and accidents that may incur injury should be reported to the safeguarding team immediately (see appendix 2). The safeguarding team will decide the relevant form of communication to involved parties, e.g., parents and social workers where relevant. For those pupils who are looked after, or attend respite services after school, this information will be shared with the parent/carers, respite provider and social worker. A body map should also be completed for all pupils.

11.17 All records/reports are either kept by the DSL on the secure online management system CPOMS, in a separate file for each pupil, or in a locked filing cabinet with access only to the safeguarding team and are passed to Social Services when a referral is made. In cases of alleged child abuse, neglect or exploitation which go to court, the court may require the school to provide child protection records.

11.18 Relevant agencies, including Ofsted, RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations), and the local authority, will be notified within the required time frames for any serious accident or injury to, or the death of a pupil, and any advice from those agencies is acted on.

12. Educating children about issues (PSHE & RSE)

12.1 The school recognises the importance of making pupils aware of behaviour towards them, that is not acceptable and how they can keep themselves safe. The school's policy on Personal, Social and Health Education (including Relationships and Sex Education Policy) provides opportunities for pupils to learn about keeping safe, and who to ask for help if their safety is threatened. As part of developing a healthier lifestyle, pupils will be taught:

- To recognise and manage risks in different situations and then to decide how to behave responsibly
- To judge what kind of physical contact is acceptable and unacceptable
- To recognise when pressure from others threatens their personal safety and well-being and develop effective ways of resisting pressure, including knowing when and where to get help

13. Safeguarding Adults

13.1 The definition of an adult at risk under the safeguarding duties of the Care Act 2014 applies to any person who is aged 18 years or over and has needs for care and support; is experiencing, or at risk of, abuse, neglect or exploitation; as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse, neglect or exploitation.

13.2 Safeguarding procedures for all pupils will be followed by the staff team, however, adults have a general right to independence, choice and self-determination including control over information about themselves and their privacy. In the context of adult safeguarding these rights can be overridden in certain circumstances. If the information is confidential, but there is a safeguarding concern, sharing it may be justified. The General Data Protection Regulation sets out a framework to enable the lawful sharing of information.

13.3 There are cases where the pupil concerned will refuse their consent for the police or social services to be contacted, for any safeguarding action to be taken, or for their information to be shared with another agency.

13.4 The pupil has the right to make their own decision and express a wish for concerns not to be pursued. Their wishes should be respected wherever possible, but there are times when their wishes can be overridden.

13.5 Consideration will need to be given to other factors such as the seriousness and pervasiveness of the abuse; the ability of the pupil to make decisions; the effect of the abuse on the pupil in question, and on others; whether a criminal offence has occurred; and whether there is a need for others to know (e.g., to protect others who may not be involved in the immediate situation).

13.6 Where this is the case, the pupil should be made aware of the risks involved in their decision, be told that they can change their mind at any point and given information about services that could help reduce the risk. Their refusal to consent must also be clearly recorded. If a decision is then made to take the case forward, this must be clearly explained and recorded.

13.7 Any member of staff must report suspected abuse, neglect or exploitation to the DSL or DDSL, even if the adult has refused their consent. The DSL or DDSL will then take the decision whether or not to apply the exceptions below.

13.8 Exceptions:

- where a person is assessed as not having the 'mental capacity' to make this decision, appropriate representatives/advocates should be consulted. However, in such cases it is the final decision of the school and/or statutory authorities involved
- where a crime has taken place and there is an overriding public duty for the police to investigate
- where other vulnerable adults and/or children may be at harm from the person/group/agency suspected of causing abuse, neglect or exploitation
- where gaining the pupil's consent would place them at further risk
- where the pupil is at serious risk of harm – this decision should only be taken with multi-agency agreement that this is in the adult's best interests

13.9 Decisions about sharing information must be clearly recorded with reasons clearly stated. Decisions about sharing information must be openly and explicitly discussed at every stage

13.10 Surrey Safeguarding Adults Board (SSAB) are the lead agency in the coordination of safeguarding investigations. Please refer to Surrey Safeguarding Adults Board for detailed information about Safeguarding Adults investigations.

13.11 Other organisations may also be involved in the investigation of safeguarding cases:

- A police investigation will usually take place where a crime is thought to have been committed
- Provider organisations may be asked by SSAB to lead set parts of the investigation

13.12 Staff working with the pupils who are young adults, take part in regular training specific to safeguarding adults, including understanding the Mental Capacity Act and Deprivation of Liberty Safeguards (DOLS proposed to be replaced by The Liberty Protection Safeguards (LPS) on a date yet to be announced)

14. Protecting Pupils from Unsuitable People

Child on Child Abuse (including harassment and violence)

14.1 Children may be harmed by other children or young people. Staff will be trained to be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

14.2 The pupils attending Jigsaw School have a diagnosis of autism. This means that they are likely to have a limited ability to comprehend that they may be engaging in activities which have the characteristics of abusive behaviour. They may also copy what they have seen others do before, or what has been done to them. Autistic pupils are likely to be unaware that certain behaviours are socially unacceptable and therefore recognise that they are a victim of abuse, neglect or exploitation and be able to communicate this to adults. This makes developing a positive culture and respect for others message in school even more important.

14.3 It is possible that one pupil may develop an obsession with another pupil which may cause distress or anxiety to the recipient. Such behaviour might include wanting to be near the 'target' pupil or having an interest in making physical contact with that pupil, such as touching a particular part of their body, demonstrating potentially physically harmful behaviours such as kicking, pinching or throwing objects.

14.4 Child on child abuse can take many forms, including:

- physical abuse such as biting, hitting, kicking or hair pulling
- bullying (including online bullying, prejudice-based and discriminatory bullying)
- abuse between children in an intimate relationship
- physical assault and harm, or the threat of harm with a weapon
- sexually harmful behaviour/sexual abuse such as inappropriate sexual language, touching, sexual assault, upskirting (a criminal offence which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and / or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.)

14.5 Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually harassing a single child or group of children. Child on child sexual violence and harassment exists in many forms, from calling someone sexualised names, flicking bra straps, lifting up skirts, grabbing bottoms, breasts and genitalia to sexual assault and rape and assault by penetration. Sexual violence and sexual harassment is not acceptable, it should never be tolerated and should never be seen as an inevitable part of growing up as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children. For children to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

14.6 Detailed advice to support staff to understand, prevent, and respond to reports of child on child sexual violence and sexual harassment is shared through regular training sessions and the staff online portal, MyJigsaw, posts in line with KCSIE.

14.7 Jigsaw School has a schoolwide approach to harmful sexual behaviour. Staff are trained to use strategies to ensure consistent management of the behaviour.

14.8 Teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse and stalking perpetrated against a current or former partner

14.9 Initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them

14.10 Prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

14.11 Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up' as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment. Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

14.12 The following steps are taken to minimise or prevent the risk of child on child abuse.

- An open and honest environment where pupils feel safe to share information about anything that is upsetting or worrying them
- Taking a whole school approach to safeguarding and child protection, setting clear school rules and expectation and reinforcing these for pupils
- Developing and enhancing communication skills
- Promoting pupils' self-awareness, confidence and self-esteem
- Teachers demonstrate positive language and attitudes and maintain professional relationships with pupils and colleagues – positive role models
- Recording, monitoring and analysis of incidents with immediate notification to SMT of any child on child abuse incidents being recorded, and incidents dealt with in line with our safeguarding and child protection policy and KCSIE
- Teaching pupils about tolerance, acceptance, cooperation, collaboration, how to be good friends through the curriculum and behaviour management strategies e.g., topic curriculum, assemblies, individual learning targets, PSHE & RSE objectives, online safety and ICT objectives linked to acceptable use
- RSE and PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school
- Pupils are regularly reminded that they can safely speak to a Jigsaw School member of staff if they are worried about anything
- Pupils are taught about specific topics related to keeping safe using resources featuring the school's safeguarding character KES (Keeping Everyone Safe) and resources provided by other services

- High staff to pupil ratios at all times mean pupils are less vulnerable to this type of behaviour
- Staff training and use of behaviour analysis to manage behaviours
- Where necessary, engaging with specialist support and interventions. Where this takes place, these professional assessments will be used to inform the school's approach to supporting and protecting pupils

14.13 All concerns of child on child abuse should be passed to the DSL immediately

Sharing Self-Generated Intimate Images

14.14 Sharing of self-generated intimate images and/or videos is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated using AI, e.g. deepfakes, that otherwise appear to be a photograph or video. Such imagery involving anyone under the age of 18 is unlawful.

14.15 Sharing Self-Generated Intimate Images refers to both images and videos 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 of 18 is in possession of sexual imagery created by another person under the age of 18

14.16 All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people

14.17 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.

14.18 If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the child protection procedures and refer to the DSL immediately.

14.19 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 must not view, copy or print the images.

14.20 The DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the pupils involved. Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the pupil at risk of harm. At any point in the process, if there is a concern a pupil has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy. An immediate request for support at the initial review stage should be made to Children's Social Care/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 SEND)
- What you know about the imagery suggests the content depicts sexual acts which

are unusual for the pupil's development stage or are violent

- The imagery involves sexual acts
- The imagery involves anyone aged 12 or under
- There is reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery, for example the pupil is presenting as suicidal or self-harming

14.21 If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Co-Headteachers, to respond to the incident without referral to the C-SPA or the Police.

14.22 As part of the decision making process 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 pupil is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND
- There is a significant impact on the pupils involved
- The image is of a severe or extreme nature
- The pupil involved understands consent
- The situation is isolated or if the image has been more widely distributed
- There are other circumstances relating to either the sender or recipient that may add cause for concern
- The pupils have been involved in incidents relating to youth produced sexual imagery previously

14.23 If any of these circumstances are present the situation will be referred according to the school's child protection procedures, including referral to the C-SPA or the Police.

14.24 The DSL will record all incidents of making, sharing and sending of self-generated intimate images and/or videos, including the actions taken, rationale for actions and the outcome.

14.25 Teaching follows best practice in delivering safe and effective education, therefore, where appropriate, pupils are taught about the issues surrounding the sharing of self-generate intimate images as part of the relationships and sex education curriculum.

Child Sexual Exploitation (CSE)

14.26 Child sexual exploitation is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.

14.27 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. This can be committed by an individual or an organised network. Most sexual abuse is committed by those previously known to the victim. It may involve an exchange for

something the victim needs or wants and/or the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

14.28 The victim may have been sexually exploited even if the sexual activity appears consensual.

14.29 Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

14.30 The School includes the risks of sexual exploitation in the PSHE and RSE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse, neglect or exploitation.

14.31 All staff are made aware of the indicators of sexual exploitation and all concerns should be reported immediately to the DSL. Signs and indicators of abuse, neglect or exploitation can be found within Appendix 1

14.32 All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL will consider whether children are at risk of abuse, neglect or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence

Radicalisation and Extremism

14.33 The Prevent Duty Guidance for England and Wales (2023) under section 26 of The Counter Terrorism & Security Act (2019) places a duty on educational settings to have due regard to the need to prevent people from becoming involved with or supporting terrorism. The school is committed to supporting vulnerable pupils through our safeguarding policies and procedures and recognises that this supports the school's contribution to the Prevent Duty.

14.34 Radicalisation refers to 'the process of a person legitimising support for, or use of, terrorist violence'

14.35 Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others: or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

14.36 Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

14.37 The School seeks to protect pupils against the messages of all violent extremism. The current threat from terrorism may include the exploitation of vulnerable people, to involve them in terrorism or an activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Fundamental British values are promoted through the curriculum to build upon pupil's resilience to radicalisation and enable them to challenge extremist views (DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools, 2014). The school has engaged positively with appropriate training to ensure all staff have the skills and knowledge to refer any concerns appropriately. Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral. The DSL, DDSLs, School Management Team and Governing Body will assess the level of risk within the school and put action plans in place to reduce risk. Risk assessment may include due diligence checks for external speakers (requesting advance copies of any presentations or leaflets that will be shared with pupils), anti-bullying policy and other issues specific to the school's profile, community and philosophy.

14.38 When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance. The DSL or DDSL should then follow the safeguarding procedures and refer cases by e-mail to preventreferrals@surrey.pnn.police.uk following the Prevent referral process and use the Prevent referral form. If the matter is urgent, then Police or Channel (the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism) must be contacted by dialling 999.

14.39 In cases where further advice from the Police is sought, dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for Surrey.

Prevent leads

Claire McDonald, Prevent Supervisor, Surrey Police:
claire.mcdonald@surrey.police.uk - 07795 043842

Lara Bowden, Project Officer, Surrey County Council:
lara.bowden@surreycc.gov.uk

Helene Morris – Department for Education (DfE) Regional Prevent Co-ordinator for Southeast - Counter- Extremism. Department for Education Prevent Coordinator for South-East
Prevent.SouthEast@service.education.gov.uk

Child Criminal Exploitation (CCE) and Gangs

14.40 Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance in power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

14.41 There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

14.42 Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing from education, when the victim may have been trafficked for transporting drugs.

14.43 A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse, neglect or exploitation. Girls may be particularly at risk of sexual exploitation.

14.44 Any concerns that a child is being or is at risk of being criminally exploited should be passed without delay to the DSL. The DSL will then contact the C-SPA and if there is concern about a child's immediate safety, the Police will be contacted on 999.

14.45 The school is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

14.46 The school understand that children who are criminally exploited should have their vulnerabilities recognised by adults and professionals and the school will treat any child who may be criminally exploited as a victim. The school understands that it is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked

Serious Violence

14.47 Staff will be aware that serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying and can also be associated with criminal exploitation.

14.48 Staff will report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL or DDSL.

14.49 There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from the setting
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

14.50 Staff are aware that violence can often peak in the house just before and after the children attend the setting which includes travelling to and from the setting.

So-called Honour Based Abuse (HBA)

14.51 Honour based abuse (HBA), or faith-based abuse, 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.

14.52 Honour based abuse 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 or forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

14.53 HBA is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

Female Genital Mutilation (FGM)

14.54 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 on 101.** The duty applies to all persons in school who are employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status.

14.55 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.

14.56 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 immediately.

14.57 School staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the school's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

14.58 There should also be consideration of potential risk to other girls in the family and the wider 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.

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

Forced Marriage

14.60 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.

14.61 Forced marriage 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.

14.62 In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced

marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

14.63 A forced marriage is not the same as an arranged marriage which is common in many 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.

14.64 School staff should never attempt to intervene directly as a school or through a third party if there is a suspicion that a pupil is at risk of a forced marriage. Contact should be made with the C-SPA and/or the Forced Marriage Unit 020 7008 0151.

Domestic Abuse

14.65 Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Children can be victims of domestic abuse. They may see, hear, or experience the effects of all forms of domestic abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse including physical, sexual, emotional abuse and stalking). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

14.66 The Domestic Abuse Act 2021 introduced the statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, , ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be 'personally connected' (as defined in section 2 of the 2021 Act).

14.67 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

14.68 The school is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey settings.

14.69 This ensures that the school has up to date relevant information about the pupil's circumstances and can enable immediate support to be put in place, according to the pupil's needs.

14.70 Parents are informed of this scheme when pupils start at the school through the parent pack, and at regular periods as a reminder of the project.

Private Fostering Arrangements

14.71 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 years old or 18 years old if the child is disabled. Children looked after by the local authority or who are placed in

residential schools, children's homes or hospitals are not considered to be privately fostered.

14.72 Private fostering occurs in all cultures and children may be privately fostered at any age.

14.73 The school recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff should be alert to possible safeguarding issues, including the possibility that a pupil has been trafficked into the country.

14.74 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, this should be raised with the DSL and the DSL will notify the C-SPA immediately.

Looked After Children and Previously Looked After Children

14.75 The school recognises that looked-after children, may face increased risks including:

- exploitation
- trauma-related behaviours
- placement instability

14.76 Although there are many different reasons why children are looked after by local authorities, these children are likely to have undergone distressing experiences. All children who are looked after have distinct backgrounds, identities, aspirations and particular needs. Some children enter care because of their own behaviour. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a pupil's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the pupil and contact arrangements with birth parents or those with parental responsibility.

14.77 The designated teacher and governor for looked after children will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

14.78 The designated teacher for looked after children and the DSL have details of the pupil's social worker and the name and contact details of the Surrey County Council's Head of Virtual School.

14.79 The designated teacher for looked after children and children previously looked after will work in partnership with the Virtual School Headteacher 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 of the pupil within their personal education plan.

Children Missing Education (CME)

14.80 All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. The school recognises that pupils who have unexplainable and/or persistent absences from education are at significant risk of underachieving, being victims of abuse, neglect and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

14.81 Where possible the school will hold more than one emergency contact number for each pupil.

14.82 The school will ensure that there is a record of joiners and leavers as defined in The Education (Pupil Registration) (England) 2006 (amended 2016).

14.83 The school will:

- Enter pupils on the admissions register on the first day on which the school has agreed, or has been notified, that the pupil will attend the school
- Monitor each pupil's attendance through their daily register and follow the SCC procedure in cases of unauthorised absence

15. Pupils Missing Out On Education (PMOOE)

15.1 Most pupils engage positively with school and attend regularly. However, in order to flourish, some pupils require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that pupils accessing alternative provision, or a reduced or modified timetable, may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

15.2 The school will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable.

15.3 The school will ensure that parents (and the local authority where the pupil has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how these will be reviewed.

15.4 The school will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it.

15.5 Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil. Therefore, the school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the pupil.

15.6 The school will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

15.7 The SMT will report to governors of any formal direction of a pupil to alternative provision to improve behaviour.

15.8 The SMT will report to governors any information regarding the use and effectiveness of the use of alternative provision and modified timetables.

16. Supporting pupils where there has been harm

16.1 The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse, neglect and exploitation.

16.2 Support may also be required for any pupil that harmed. This may take the form of help to change behaviours, , reconsidering class structures, reviewing behaviour guidelines, and input from the Speech and Language Therapists for social stories where appropriate.

17. Appointment of Staff

17.1 The Trust's Safe Recruitment Policy describes the safe recruitment practice observed in the process of appointing staff.

17.2 This includes:

- Verifying identity
- Verifying academic, professional or vocational qualifications required for the post
- Obtaining at least 2 references
- Checking previous employment and education history, establishing a full timeline since leaving secondary education till present
- Checking that an applicant to be employed to carry out teaching work as defined by The Teachers' Disciplinary (England) Regulations 2012 with the Teaching and Regulations Agency (TRA)
- Verifying medical fitness to undertake the role
- Interviewing face to face
- A section 128 check for management positions and governance
- A Disclosure Barring Service enhanced check (including a check of the Children's and/or Adult's Barred List where positions are in regulated activity)
- Self-disclosure to confirm any criminal history, including any restriction in the work performed under childcare disqualification regulations
- Checking to establish a person's right to work in the UK
- Further checks on individuals who have lived or worked outside the UK (where an individual has lived or worked abroad for 3 months or more within the last 5 years, a police check will be requested)

17.3 All staff engaged in regulated activity must have an enhanced DBS, which includes the Children's and/or Adult's Barred List check. In exceptional circumstances, where staff are working without a DBS, a risk assessment will be completed by the Human Resources Department to outline the measures in place to mitigate risk whilst the DBS is outstanding. The risk assessment is signed by the CEO or Co-Headteachers and DSL depending on the role of the individual. Individuals without DBS checks are supervised at all times while on the premises and in contact with pupils, and a separate advance barred list check on the TRA is completed for individuals who start without a DBS, where applicable.

17.4 The school complies with the obligation to record all information regarding vetting and checking staff on a single document held securely in the 'Safeguarding Single Central Record'

18. Physical Contact with Pupils / Restraint

18.1 The School's Behaviour Management Policy has guidance for all staff on the use of restrictive physical interventions and is entirely consistent with Surrey County Council's guidelines for child protection, and guidance produced by the DFE. Staff are trained in PROACT-SCIPr-UK®; physical intervention is only used as a last resort when a pupil is endangering themselves or others. Such events are recorded and monitored regularly by the School Management Team, and Ethics Committee.

19. Safeguarding Concerns and Allegations Against Staff

19.1 Any member of staff becoming aware of an allegation of abuse against another member of staff or any adult involved in the work of the school (including bank staff), or have concerns about a colleague's behaviour, must inform the Co-Headteachers or DSL. This procedure should be used in all cases in which it is alleged the person has:

- behaved in a way that has harmed a pupil, or may have harmed a pupil
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they would pose a risk of harm to children
- behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children.

19.2 In the event of allegation against the Co-Headteachers , and in line with our Complaints Policy, the Chair of Governors must be informed. Details of how to contact the Chair of Governors are available on the Jigsaw School website. If the Chair of Governors is not available, then the Local Authority Designated Officer (LADO) should be contacted directly.

19.3 In the event of allegation against the CEO, the Chair of Trustees must be informed. Details of how to contact the Chair of Trustees are available on the Jigsaw School website. If the Chair of Trustees is not available, then the Local Authority Designated Officer (LADO) should be contacted directly.

19.4 There may be situations when the Co-Headteachers, CEO, or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

19.5 In the event of an allegation, or concern about the DSL, the Co-Headteachers must be informed.

19.6 Any reported suspicion of abuse involving a member of staff must be reported to the LADO (as part of the school's mandatory duty) on 0300 123 1650 option 3 LADO. In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the police. Such report will be made by the DSL or in the case of an allegation involving the DSL by the Co-Headteachers.

19.7 If the matter is investigated internally, the LADO will advise the school to seek guidance from local authority colleagues in following procedures set out in part 4 of KCSIE and the SSCP procedures.

19.8 The Co-Headteachers will inform the accused person about the allegation as soon as possible following referral to the LADO and will take advice from the LADO, police and children's social care services.

19.9 The school will deal with any allegations promptly, in a fair and consistent manner that provides effective protection for the pupil and at the same time supports the person who is the subject of the allegation.

19.10 An individual should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, reasons will be recorded by the school and the individual notified. Allegations that are found to be malicious will be removed from the individual's HR files.

19.11 The School is required by law to make a referral to the DBS where they cease to use a person's services, or the person ceases to provide their services, before or after a disciplinary process is completed, because they are considered unsuitable to work with children as a result of misconduct, or because of a medical condition that raises a possible risk to the safety or welfare of children and vulnerable adults. The report is to be made within one month of the individual leaving the school. Reporting to the Teaching Regulation Agency will also be made for serious concerns relating to allegations against staff.

IMPORTANT CONTACT INFORMATION:

Surrey LADO:	0300 123 1650 option 3
NSPCC Child Protection Line:	0808 800 5000 (24/7)
Childline:	0800 1111
Ofsted Helpline:	0300 123 1231
Prevent:	020 7340 7264

20. Policy Review

20.1 This policy will be updated as necessary to reflect best practice and to ensure compliance with any changes or amendments to relevant legislation.

20.2 This policy was last reviewed in July 2026.

21. Version History

Version No.	Point No.	Amendment
1.1		Sept 2019 version
2.1		October 2019 version
	2.0	Update to definitions to reflect changes to Multi-Agency Partnership and Single Point of Access. Updates also throughout the policy to reflect these changes.
	3,2	Additional deputy DSL to Jigsaw School
	5.2.1	Additions to the Role of the Governing in line with recommendations from Surrey's Education Safeguarding Team
	7.14	Additions to the Whistleblowing procedures. Reference to the NSPCC helpline
	12.3	Addition to policy on Child Criminal Exploitation and Gangs in line with recommendations from Surrey's Education Safeguarding Team
	12.7	Addition to policy on Domestic Abuse in line with recommendations from Surrey's Education Safeguarding Team
	12.8	Addition to policy on Private Fostering Arrangements in line with recommendations from Surrey's Education Safeguarding Team
	12.9	Addition to policy on Children Looked After in line with recommendations from Surrey's Education Safeguarding Team
	Appendix 4	Change to visual for the Pupil Page in line with introduction of "Jiggy" and Keeping Safe with Jiggy
		Update to policy in line with changes to legislation – Keeping Children Safe in Education 2019.
	9.4/9.5/9.6	Addition to policy on the sharing of pupil's education and where the serious harm test is met. Reference to legislation and documents concerning GDPR and sharing of data
	12.7.4	Addition of child on child sexual violence and sexual harassment in line with Keeping Children Safe in Education 2019 updates.
2.2	Section 12	Whole section inserted.
2.3	Section 12	Updated to ensure clarity
2.4	Section 10.3	Updated to include when and how a bruise or mark on a pupil is reported and communicated
2.4	14.10.1	Information why some children become LAC. May 2020
2.6	13.0	Minor edits following a scheduled 6 monthly review Addition of adult safeguarding procedures for those pupils 18 years and above.
3.1	Oct 2021	Major policy review, and updates to terminology,
3.2	Dec 2021	Appendix 3 added
3.3	March 2022	Appendix 3 removed pending updated poster
3.4	June 2022	New deputy DSL's appointed
3.5	October 2022	Updates related to Keeping Children Safe in Education 2022 and Surrey County Council Safeguarding and Child Protection Template Policy 2022 – 2023. Reformatting and reordering.
3.6	December 2022	Updated name of deputy DSL
3.7	January 2023	Updates related to introduction of new safeguarding character KES and section on Equality Act 2010.
3.8	May 2023 15.1	Removal of document no longer in use and updates to child on child abuse section
4.1	July 2023	Updated in line with KCSIE 2023 guidance, and operational updates.
4.2	April 2024	sections 2.1 and 2.17 and the date change on the Working Together to Safeguard Children, updated 5.1
5.1	July 2024	Updates related to Keeping Children Safe in Education 2024
5.2	October 2024	17.2 Updates related to Appointment of Staff in line with Safe Recruitment Policy.
5.3	January 2025	Adjustment of language at 19.1 for clarity; replacement of 'National College for Teaching and Learning' with 'Teaching Regulation Agency' at 19.10.
6.1	July 2025	Updated in line with KCSIE 2025, updated staff names, addition at 6.2.1
7.1	July 2026	Updated in line with KCSIE 2026 and Working Together to Safeguard Children 2026. Director of Education changed to Co- Headteacher throughout.

22. Related Legislation, Guidance & Supporting Documents

Document
The Children Act 1989, updated 2004
Education Act 2002
The Equality Act 2010
The Equality Act 2010 and Schools – advice for schools
Children Missing Education (September 2016) – statutory guidance for Local Authorities
Protection of Freedoms Act 2012
Keeping Children Safe in Education (2026)
Surrey's FaST Resolution Process
Statutory guidance - PACE Code C 29.
Behaviour in Schools (September 2024) – advice for Headteachers and Staff
Online Safety in Schools – DfE advice
Counter Terrorism and Security Act (2015)
Working Together to Safeguard Children 2026
What to do if you are worried a child is being abused (2015)
Disqualification under the Childcare Act 2006 (updated 2018)
Surrey Safeguarding Children Board protocols, guidance and procedures.
https://surreyscb.procedures.org.uk/zkyqqt/managing-individual-cases/continuum-of-support-for-children-and-families-living-in-surrey - :~:text=The continuum of support clearly,likely to suffer serious harm).
Female Genital Mutilation Act 2003 Mandatory Reporting Guidance 2016
Homepage - Surrey Safeguarding Adults Board (surreysab.org.uk)
Criminal exploitation of children and vulnerable adults: county lines - GOV.UK (www.gov.uk)
Preventing youth violence and gang involvement - Practical advice for schools and colleges (publishing.service.gov.uk)
Safeguarding Children and Young People from Sexual Exploitation (2003)
Mental health and behaviour in schools - GOV.UK (www.gov.uk)
Childcare (Disqualification) Regulations 2009
The Prevent Duty - Departmental advice for schools and childcare providers (2023)
Prevent Referral Form
DfE Prevent guidance – https://educateagainsthate.com
Information sharing guidance for practitioners providing safeguarding services to vulnerable children, young people, parents and carers
Sharing nudes and semi-nudes: advice for education settings working with children and young people
The Education (Independent School Standards) Regulations 2014 (amendment)
General Data Protection Regulations (2018)
Framework for the Assessment of Children in Need and their Families https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf
ADASS 'Safeguarding Adults: A National Framework of Standards for good practice and outcomes in adult protection work' (February 2010)
Care Act 2014 – Makes provision for safeguarding adults from abuse, neglect and exploitation, setting out the legal obligations placed on the statutory organisations. The provisions within this Act replace the No Secrets (2000) Guidance.
Mental Capacity Act (MCA) 2005
Surrey safeguarding adults policy and procedures
SEND Code of Practice 0 to 25 years
Supporting Pupils at School with Medical Conditions
Find your local IAS service (councilfordisabledchildren.org.uk)
Mencap
The Teachers' Disciplinary (England) Regulations 2012

23. Related Internal Documentation

Document	Electronic Copy Location
Anti-Bullying Policy	Common / MyJigsaw / Policies / School
ICT Acceptable Use and Social Networking Policy	Common / MyJigsaw / Policies / Trust
Behaviour Management Policy	Common / MyJigsaw / Policies / School
Complaints Policy	Common / MyJigsaw / Policies / School
Equality & Diversity Policy	Common / MyJigsaw / Policies / School
Personal & Intimate Care Policy	Common / MyJigsaw / Policies / School
Online Safety Policy	Common / MyJigsaw / Policies / School
Health & Safety Policy	Common / MyJigsaw / Policies / School
Safe Recruitment Policy	Common / MyJigsaw / Policies / Trust
Site Access and Security Policy	Common / MyJigsaw / Policies / Trust
Staff Code of Conduct Policy	Common / MyJigsaw / Policies / Trust
Whistleblowing Policy	Common / MyJigsaw / Policies / Trust
Concerns Policy	Common / MyJigsaw / Policies / Trust
PHSE Policy	Common / MyJigsaw / Policies / School
Relationship & Sex Education Policy	Common / MyJigsaw / Policies / Trust
Managing & Administering Medication	Common / MyJigsaw / Policies / School

APPENDIX 1 – Types of Abuse, Neglect and Exploitation

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, female genital mutilation or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as Fabricated Induced Illness (previously known as Munchausen Syndrome by Proxy).

Emotional Abuse

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

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

Neglect is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to:

- provide adequate food, shelter and clothing (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The Neglect Risk Assessment Tool is available to provide more detailed information regarding the assessment of neglect.

Indicators of abuse, neglect and exploitation

Physical signs define some types of abuse, including CSE, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a pupil has been abused.

A pupil who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- be persistently absent from education, including persistent absences for part of the school day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol

- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new ‘friends’

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

APPENDIX 2 - Safeguarding: Mark or Bruise – unknown cause

SAFEGUARDING: MARK OR BRUISE - UNKNOWN CAUSE

Safeguarding Team	Jayne Lobley	Designated Safeguarding Lead (DSL)
	Meredith Wightman	Deputy Designated Safeguarding Lead (DDSL
	Billie Booker-Moniz	Deputy Designated Safeguarding Lead (DDSL)
	Emma Hawkins	Director of Education, Co-Headteacher & DDSL
	Victoria Woods	Governor responsible for safeguarding

Mark or bruise observed with an UNKNOWN cause

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Directly inform a member of the Safeguarding Team as soon as possible, by phone or in person

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The Safeguarding Team will let you know what to do next

It is likely that you will be asked to write a CPOMS report, and inform parents by ReachMoreParents (RMP), but it is very important that you inform the Safeguarding team directly first, in case they need to follow up.

REMEMBER - TELL SAFEGUARDING and THEY WILL TELL YOU WHAT TO DO NEXT!

EXAMPLE CPOMS REPORT

"Louise Jones (teacher) observed a bruise on John Smith (pupil). The bruise is round, about the size of a 2p coin, brown in colour and is on the back of his right arm just above the elbow. Class are not aware how this occurred."

REMEMBER: CPOMS reports should have a clear description of the mark, and its location

EXAMPLE CLASS ReachMoreParents MESSAGE

"We noticed a bruise on the back of John's right arm. We are not aware of anything that may have caused this but wanted to let you know."

REMEMBER: We are informating them of the mark, not asking if they know the cause.

APPENDIX 3 – Intimate Care

Staff who provide intimate care are trained to do so (including Child Protection and Health and Safety training in moving and handling) and are fully aware of best practice. Pupils with special educational needs can be especially vulnerable. Staff involved in their intimate care need to be particularly sensitive to their individual needs.

Intimate Care Procedures

When touching a pupil, staff should always be aware of the possibility of invading their privacy and will respect the pupil's wishes and feelings.

If a pupil needs to be cleaned, staff will make sure that:

- Protective gloves are worn
- The procedure is discussed in a friendly and reassuring way with the pupil throughout the process
- The pupil is encouraged to care for themselves as far as possible
- Physical contact is kept to the minimum possible to carry out the necessary cleaning.
- Privacy is given appropriate to the pupil 's age and the situation
- All spills of vomit, blood or excrement are wiped up put into nappy sacks and placed in the appropriate bin
- Any soiling that can be, is flushed down the toilet
- Soiled clothing is put in a plastic bag, unwashed, and sent home with the pupil

For further guidance please refer to the school's Personal and Intimate Care Policy

APPENDIX 4 – Safeguarding Policy Pupil Page

Jigsaw CABAS® School

Safeguarding Policy Pupil Page

Do you ever feel worried or frightened? If you do, the adults at school are here to help you. Come and talk to us and we will help you.