IPSWICH SCHOOL

# CHILD PROTECTION AND SAFEGUARDING CHILDREN POLICY | 2026-27

(INCLUDING EARLY YEARS FOUNDATION STAGE [EYFS] AND THE LODGE DAY NURSERY)

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# 1. Introduction

This policy applies to Ipswich School and Ipswich Preparatory School ("the School") which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) and is available on the School website.

Ipswich School's duty of care to all its pupils (and children in the Lodge Day Nursery) is in accordance with:

- The Children Act (1989)
- The Education Acts of 1996 and 2002
- *'Keeping Children Safe in Education'* KCSIE (Department for Education [DFE], September 2026)
- KCSIE *Disqualification under the Childcare Act 2006 (March 2015, revised August 2018)*
- KCSIE *What to do if you're worried a child is being abused (March 2015)*
- *Working Together to Safeguard Children'* (HM Government, updated 2026)
- The Crime and Policing Act 2026
- The Data (Use and Access) Act 2025
- *Prevent Duty Guidance : For England and Wales* (March 2015 - updated March 2024)
- RSE (July 2025) https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education
- Children Missing in Education (September 2025)
- Multi Agency Guidance on FGM (July 2020)
- Behaviour in Schools (February 2024)
- Children's Social Care National Framework (July 2025)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)
- Out-of-school settings: safeguarding guidance for providers (May 2025)
- Digital and technology standards in schools and colleges (April 2026)
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (Feb 2026)
- National Minimum Standards for Boarding Schools (Sept 2022)
- Section 3 of Early Years Foundation Stage Statutory Framework for group and school-based providers (Sept 2026) ("EYFS Framework")

Prevent is supplemented by non-statutory advice and a briefing note:

*Prevent Duty Guidance (for England and Wales)*

*https://www.gov.uk/government/publications/prevent-duty-guidance (Sept 2023; Last updated March 2024)*

*The use of social media for on-line radicalisation (July 2015)*

This duty of care extends to boarding pupils who are accommodated at the School and the School's arrangements have regard to the National Minimum Standards for Boarding Schools.

# 2. Policy Aim

The legislation places on the School a duty to **safeguard** and **promote** the welfare of our pupils. The term 'welfare' is taken to embrace health, happiness, development (physical, intellectual, social and behavioural), and protection from risk of suffering physical harm. This includes areas of pastoral care during the school day, outside the school day for boarders, out of school activities if arranged by the school (including trips during the holidays). The School acts in the best interests of the child at all times to enable all children to have the best outcomes.

# 3. Policy Statement

Ipswich School fully recognises the contribution it can make to protect children and support pupils in the School. Procedures should be applied with common sense and good judgment. There are three main elements to our Safeguarding Children Policy:

(a) Prevention (e.g. positive school atmosphere, teaching and pastoral support to pupils)
(b) Protection (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns)
(c) Support, including early help (to pupils and staff and to children who may have been abused)

**For the purposes of this policy, references to the word "should" mean that the individual "must" adhere to this item.**

# 4. Supervision of children by adults

Checking procedures are laid down for the appointment of all staff who have significant contact with pupils, teaching and support, permanent or temporary, volunteers, full or part-time, as well as staff employed by another organisation, (contractors) and those working with pupils on another site and School Governors. In accordance with KCSIE 2026 provisions, the supervision exemption for regulated activity has been removed for regular volunteers and staff involved in instructing, caring for, or supervising children; all such individuals engage in Regulated Activity and must undergo full safer recruitment vetting, including Enhanced DBS and Barred List checks, prior to commencement. Where Disclosure and Barring Service (DBS) checks are not practical in off-site activities, pupils will be accompanied by a member of Ipswich School staff.

The School has put in place safe recruitment procedures for all staff and has updated these in light of legislative requirements (see Recruitment and Selection Policy). All staff are checked for their suitability to work with children through the DBS at Enhanced level. It should be noted that the School is required by statute to report to the Disclosure and Barring Service, within one month of the person leaving the School, any person whose services are no longer required because they have been considered unsuitable to work with children.

Where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate, a referral will be made to the Teaching Regulation Agency:

- Unacceptable professional conduct
- Conduct that may bring the profession into disrepute
- A conviction, at any time, for a relevant offence.

When considering safeguarding children issues, regard should also be taken to linked Ipswich School polices and guidance including: Anti-Bullying; Codes of Conduct for Teachers and Pupils; Low Level Concerns Policy, Child-on-Child Abuse Policy; Online Safety Policy (including our monitoring and filtering systems); Equal Opportunities; Educational Trips; Health, Safety and Welfare; Prevent; Professional Conduct and Standards; Rewards and Sanctions; Staff Discipline; Staff Recruitment; Code of Conduct (Lodge); Whistleblowing. All Prep and Senior School policies can be found in the Google Shared Drive - School Policies. All Lodge policies are on the Lodge management drive.

# 5. Roles and Responsibilities

**Ms Anna Hennell James** (last training 24 June 2024) **is the nominated School Governor** with responsibility for Safeguarding and is the named Whistle-Blowing Governor. She can be contacted via the Director of Finance and Operations and Clerk to the Governors (email: jmh@ipswich.school, direct line telephone: 01473 408853). In her absence, Dr Rosemary Gravell is the nominated School Governor with this responsibility. Ms Hennell James will monitor and review annually, with the Governing Body, the implementation of this policy and draw the attention of the Head and Prep Head to any areas identified for further attention. Any deficiencies or weaknesses highlighted will be corrected without delay. The nominated School Governor is designated to take a lead in relation to responsibility for the safeguarding arrangements but the safeguarding arrangements remain the responsibility of the whole governing body of Ipswich School.

The Head, Nick Gregory (last training 28 November 2024), has appointed **Mrs Sarah Barrett as Designated Safeguarding Lead (DSL) in the Senior School** and she is the link with the Local Authority and Governing Body in matters relating to safeguarding issues in the Senior School, supplying information as necessary (last training date 6 June 2025). In her absence, reports should be made to Miss Rebecca Halford-Thompson (last training 7 February 2024).

**Mrs Amy Barber (Assistant Head) is the DSL in the Prep School**, and she is the link with the Local Authority and Governing Body in matters relating to safeguarding issues in the Prep School, supplying information as necessary (last training date 19 January 2026). In her absence, reports should be made to Mrs Lucy Southgate, Prep Head and DDSL (last training date 19 January 2026 or Mrs Alison Werrey-Easterbrook (19 January 2026)

**Hayley List (Lodge Day Nursery Manager) is the DSL for The Lodge Day Nursery** (last training date 7 February 2024) with Megan Parker-Hardman (Deputy Manager, last training date 7 February 2024) and Mandy McPherson (Finance Administration Officer, last training date 19 July 2025) as her deputies.

| **Who is my concern about?** | **Senior School pupil** | **Prep pupil** | **Lodge pupil** |
|---|---|---|---|
| | ↓ | ↓ | ↓ |
| **Who should I speak to?** | Sarah Barrett (Deputy Head Pastoral, Head of Boarding) sb@ipswich.school | Amy Barber (Assistant Head) mrsbarber@ipswich.school | Hayley List (Lodge Manager) hdl@ipswich.school |

| Who is my concern about? | Senior School pupil | Prep pupil | Lodge pupil |
|---|---|---|---|
| **In their absence, who else can I speak to?** | Rebecca Halford-Thompson (School Matron) rht@ipswich.school | Lucy Southgate (Prep Head) prephead@ipsswich.school<br><br>or<br><br>Mrs Alison Werrey-Easterbrook (Head of Learning Enhancement) learningenhancement@ipswich.school | Megan Parker-Hardman (Deputy Manager) meph@lodgedaynursery.co.uk<br><br>or<br><br>Mandy McPherson (Finance Administration Officer) mlm@lodgedaynursery.co.uk |

**The Head/Prep Head automatically assumes the role of DSL in cases where staff are the subject of an allegation.** If the Head is the subject of an allegation, the Chair of Governors, Mr Nigel Farthing, will take on responsibility for this allegation. He will liaise with the Vice Chair of Governors, Ms Anna Henell James.

| Who is my concern about? | Concern about the **behaviour of the Head** | Concern about the **behaviour of the Prep Head** | Concern about the **behaviour of a member of staff in the Senior School** | Concern about the **behaviour of a member of staff in the Prep** | Concern about the **behaviour of a member of staff in the Lodge** |
|---|---|---|---|---|---|
| | ↓ | ↓ | ↓ | ↓ | ↓ |
| **Who should I speak to?** | Chair of Governors, Mr Nigel Farthing via the Director of Finance and Operations and Clerk to the Governors email: jmh@ipswich.school | Head, Nick Gregory, via email njg@ipswich.school | Head, Nick Gregory, via email njg@ipswich.school | Prep Head, Lucy Southgate, via email prephead@ipswich.school | Lodge Manager, Hayley List, via email hdl@lodgedaynursery.co.uk |

The role of the DSL is outlined in the DSL job description which is available for all staff (Appendix 5). The DSLs also take the responsibility for Prevent. In addition to the DSLs, the School has additional online safety leads, outlined below. All Ipswich School DSLs are contactable internally through their personal email address or phone number available to all staff and governors, or by emailing safeguarding@ipswich.school.

There will always be a DSL or DDSL available within the school day and during term time for Boarders. There will always be a DSL available for The Lodge Day Nursery whilst it is open (50 weeks per year). If it is not possible to contact the DSL or Deputy in the usual section of the School and a child is deemed to be

in immediate danger, the DSL or Deputy will be available in the other section of the School. It is also possible to contact Customer First directly - 0800 9171109.

All safeguarding interviews should be conducted by the DSL or his/her deputy.

**Online Safety Leads:** Mr Stuart Dove (Head of Computer Science, Senior School) is the Senior School's representative for online safety. Mrs Rachel Bryanton (Deputy Head, Prep) and Miss Sophie Bugden (Computing Subject Leader, Prep) are the Online Safety Leads in the Prep School.

**Boarding:** Alternative accommodation (away from children) would be found in cases where a member of boarding staff is suspended pending an investigation of a child protection nature. If a boarder is suspected of abuse of a peer, appropriate action would be taken to segregate their rooming/accommodation immediately within the boarding context and normal procedures for referral would be followed.

**Training:** The DSLs and deputies will ensure that they attend regular training courses relevant to their roles at least every two years, or at such shorter intervals as required by the Suffolk Safeguarding Partnership (SSP). Training is in line with Suffolk Safeguarding Partnership Arrangements and matches the description given in *Keeping Children Safe in Education (KCSIE)* Annex C.

Training for staff, in order to continue to provide them with relevant skills and knowledge to safeguard children effectively occurs on a regular basis with updates at least annually in line with SSP. All safeguarding policies and reading materials are readily available for staff to read and understand.

Training for Governors occurs at the point of induction and on regular occasions throughout the year in order for them to monitor the effective safeguarding practices in the School. Governors responsible for safeguarding are expected to read *Keeping Children Safe in Education (KCSIE)* Annex C.

All staff are required to read and understand Part One of KCSIE in FULL. Staff are updated each time KCSIE is updated or when new duties are introduced. New staff meet with the DSL to ensure they understand KCSIE. All existing staff have been trained in the Prevent Duty and new staff are required to undergo training if they have not already done so. All relevant staff receive appropriate online safety training as part of their regular safeguarding training. During training, staff are reminded that they should report any concerns regarding FGM directly to the Police.

Regular professional development opportunities are offered to those who work directly with children.

# 6. Guidelines to Staff

## What is safeguarding?

Safeguarding is the process of protecting an individual's health, wellbeing, and human rights, ensuring they can live free from harm, abuse, and neglect. It encompasses measures to prevent and respond to various forms of abuse, neglect, and exploitation, and is a collective responsibility, especially for vulnerable individuals.

Examples of safeguarding issues are:

- child sexual exploitation (CSE)
- child criminal exploitation (CCE) - children must be treated as victims
- misinformation
- disinformation
- conspiracy theories
- generative AI (including deepfakes, AI-assisted sexual imaging, and abusive synthetic content)
- modern slavery
- bullying and child-on-child abuse (including cyberbullying)
- so-called honour-based violence
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) where all discovered acts are reported to the police (section 5B of FGM Act 2003)
- forced marriage
- gangs and youth violence (County Lines)
- misogynistic or discriminatory online influences and extremist content targeting young people
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- radicalisation, including radical ideologies, conspiracy theories and YouTube influencers
- youth produced sexual imaging
- sexting
- teenage relationship abuse
- trafficking
- going missing from school/abduction
- Sexual violence and sexual harassment between children in schools and colleges
- upskirting
- breast ironing
- It is noted that unwanted, persistent 'banter' could be deemed as abuse
- hazing (pressure to perform rituals or coercion into activities)
- involvement of pupil or parent in the court system/prison
- LGBT phobic bullying
- Is pregnant and/or a parent themselves.
- Repeatedly removed from the classroom or experienced multiple fixed term exclusions
- On a part time timetable
- Has exhibited early signs of abuse

# What is Child Abuse?

The term is applied to the mis-treatment of children and young people under the age of 18 years (or 18 years old and still in full time education) by any person having permanent or temporary custody, care or charge of the child; or where that carer knowingly colludes with the mis-treatment of the child. It can also be child on child. Abuse can take place wholly online and technology may be used to facilitate offline abuse. The following categories are commonly accepted but it is important to note that abuse will often fall into more than one of these.

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

**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 oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

**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 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 the 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. It may also include 'Verbal Abuse' - persistent criticism belittling or name calling of children.

## How do I recognise child abuse?

As well as obvious non-accidental injuries, injuries which are not consistent with the explanation given and incidents reported by the pupil or by others, the following signs may be significant in the light of other concerns:

- repeated minor injuries
- poorly clothed or who appear underfed
- lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from School for no apparent reason
- does not trust adults, particularly those who are close
- 'tummy pains' with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self inflicted wounds
- reverting to younger behaviour
- depression, withdrawal
- relationships between child and adults which are secretive and exclude others
- pregnancy
- mental health problems
- showing addiction to screen time and being ‘online’ on a device

Staff should be aware that LGBTQ+ pupils may be particularly vulnerable to abuse.

Those working with children and young people at Ipswich School should also be aware that some young people are drawn into activities which could include serious violence or criminal activity. The following signs may be significant in the light of other concerns:

- increased absence from school,
- 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,
- 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.

## Impact of domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn. Children who see, hear, or experience the effects of domestic abuse are explicitly defined as victims in their own right, rather than merely "witnesses" or bystanders.

In all situations, it is important to bear in mind the context of the child and how this can affect their wellbeing. It is key to be aware of 'Stalking' and 'Criminal Exploitation' including financial exploitation. Often children who are new to relationships themselves will not identify abuse red flags and how to look out and watch for those. Staff should remain vigilant to conversations between children.

## Prevent

Staff should also be aware of pupils who display behaviours such as:

- becoming increasingly argumentative;
- unwilling to engage with students who are different;
- becoming abusive to students who are different;
- embracing conspiracy theories

and should refer to the link Education Against Hate: https://educateagainsthate.com/ for further guidance. Any such concerns should be referred to the DSL.

These signs are not evidence themselves, but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

Staff and those working with children and young people at Ipswich School should be aware that any child may benefit from family help, but all school staff should be particularly alert to the potential need for family help for a child who:

- is disabled and has specific additional needs (SEND);
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is frequently missing/goes missing from care or home;
- is misusing drugs or alcohol;
- is suffering from or has suffered from mental health issues themselves;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
- has returned home to their family from care
- has been involved in a Forced Marriage

# 7. How does the School respond?

The School seeks to act as best it can to protect all pupils in its care. Whilst the School is **not** an investigation or intervention agency, it does recognise that it may have an important role to play in the recognition and referral stage of child abuse. Teachers and non-teaching staff at Ipswich School are particularly well placed to observe outward signs of abuse, changes in behaviour or failure to develop, which could also indicate a risk of being drawn into terrorism, by virtue of their day-to-day contact with children.

All adults working with children have a responsibility to protect children. Senior pupils who hold positions of responsibility over other pupils will be briefed on appropriate action to take should they receive a disclosure. Where any member of staff suspects that a pupil is being abused or has a disclosure of such abuse made by the pupil to him/her, or when any member of staff suspects a pupil is at risk of being drawn into terrorism or extremism, and therefore they are in immediate danger, then that member of staff **should act by reporting the matter immediately to the relevant DSL** who will make prompt contact with Children's Social Services (Full local procedures are available on the Suffolk Safeguarding Partnership's website http://suffolksp.org.uk/). Any member of staff who is concerned about a child may report the matter directly to Children's Services, tel: 0808 800 4005 and, in an emergency, dial 999. Referrals to statutory agencies do not require parental consent.

Children at Ipswich School need to be protected from abuse and radicalisation or significant harm. We also understand that some children need support from additional agencies. The former should be referred immediately to Customer First, the latter should be supported through the 'Early Help Assessment' (EHA) and 'Team Around the Child' (TAC) approaches which lead to multi-agency support. Where there is concern of radicalisation, the School will consider the level of risk and make the most appropriate referral which could include 'Channel' and Children's Social Care.

For support and advice about extremism the following contacts may be used:

- 101 for non-emergency cases to the police or the DfE dedicated Prevent helpline and mailbox for non-emergency advice for staff and governors:
  Tel: 020 7240 7264. Email: counter-extremism@education.gsi.gov.uk
- Further information can be found here

There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Staff are aware that they can take their concern directly to Customer First if they wish or if they feel that the School has not responded as they would have wished them to.

All allegations of a child being at risk of serious harm are reported either to Children's Social Services, the Designated Officer (LADO), police or directly to the DFE immediately.

Where a person is considered unsuitable to work with children, (whether employed, contracted, a volunteer or student) the School will report this to the Disclosure and Barring Service within one month of the person leaving the School. Allegations found to be malicious, following investigation, will be removed from personnel files. Records will be kept of all allegations but any that are not substantiated, are unfounded or malicious, will not be referred to in employer references.

A bullying incident should be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm (see Anti-bullying Policy).

The school seeks to work in close partnership with families, the safety and wellbeing of the pupil always takes priority over standard parental notification.

**Risk of Escalation / Harm at Home**

If staff or the Designated Safeguarding Lead (DSL) assess that telling the parents/carers could:

- Increase the risk of severe harm to the pupil,
- Trigger physical or emotional retaliation,
- Lead to abuse, neglect, or forced marriage/honour-based violence, or
- Escalates a severe mental health/crisis state because of the home environment,

**Staff are required to withhold contacting parents immediately.**

## What should I do if I suspect that a child has been abused or is at risk?

It is important to listen to and reassure that child. Get as much information as you can **without appearing to interrogate them.** Then make careful notes of what was said and speak immediately with the relevant Designated Safeguarding Lead and if necessary the relevant Head. Notes should be clearly recorded on CPOMS by the person who has heard the disclosure or had the concern at the earliest opportunity. **Say nothing to the parent/carer at this stage, unless the information has come from them, including in cases of radicalisation.**

***Listening to young people*** – these skills are based on basic counselling techniques: you should minimise what you say, allowing the pupil to tell his/her story without being silenced or led.

**Acceptance –** Listen to what you are told without displaying your own feelings. **You** do not need to decide if the story is true or not. Do not make notes in the presence of the child.

**Confidentiality – Never promise confidentiality.** Be prepared for this request and rehearse your own response in advance e.g. "I am only too ready to listen but at this point I can't promise total confidentiality …"

**Reassurance –** Acknowledge their courage in telling you but do **not** say "It will be O.K. now" and do not apportion any blame to anyone. **All victims will be taken seriously.**

**Questioning –** Ask as few questions as possible. Ensure that your questions are open-ended and not leading e.g. "Did your step-father do this?" (*Leading)* "Do you want to tell me who did this?" *(Open-ended).*
Avoid asking for details that you do not need to know. Clarify what has been said. If necessary, reflect back what has been said to give the young person an opportunity to correct you. Never ask the pupil to write down details in an abuse situation – it could be used as evidence in any police investigation. Leave that to the police.

**Explaining –** You should explain what you will do with this information (i.e. refer to the designated teacher who may then take it further).

**Recording –** Make notes as soon as possible after the interview. Include date, time and place, and who was present. Record verbatim whatever phrases you can recall the child using. Describe observable behaviour (e.g. crying). Do **not** tape record the interview. These notes need to be written up on CPOMS and any paper notes shredded.

All Safeguarding notes are kept securely on CPOMS. Confidential electronic records are stored securely and are only accessible to the DSLs and the Head. In the same way, notes must be kept of any pupil who is being monitored for child protection reasons. Records of all concerns and actions are recorded and are stored in a confidential format with appropriate security measures. File notes are kept for 25 years from the child's date of birth.

**Pupils Leaving Ipswich School** - If a pupil transfers from the School, these files will be forwarded to the pupil's new school marked 'Confidential' and for the attention of the receiving school's Designated Safeguarding Lead. The files are sent by recorded delivery as we understand that they are confidential and our responsibility until they are received by the new school / establishment. The receiving School is asked to acknowledge receipt. When both schools use CPOMS, the system links directly with the school's MIS (Management Information System). It uses the pupil's **UPN** and basic demographic details to match the child and transfer their safeguarding chronology seamlessly and securely between Designated Safeguarding Leads (DSLs).

Feeder schools are requested to forward any relevant child protection information on pupils joining Ipswich School.

**Pupils Joining Ipswich School -** it is the responsibility of the DSL to instruct the admissions team to contact all schools of new joiners to transfer any safeguarding information within 5 days of a child joining Ipswich School. If both schools are using CPOMS, this can be done electronically. If not, it should be sent recorded delivery and signed for on arrival and handed directly to the DSL.

**Support –** Think about what support is necessary for the pupil. Possible avenues for pastoral support are outlined in the staff handbooks - support is available via pastoral managers, Matron, the Chaplain, the School's Emotional Wellbeing Co-ordinator and School Counsellors as required. Children in need of support or who may be at risk of some harm will be referred to Children's Services (0808 800 4005). The School will liaise closely with external agencies utilising Team Around the Child (TAC) meetings and Child in Need meetings.

## Female Genital Mutilation (FGM) specific procedures

In the case of FGM, it is mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss such a case with the DSL and involve social care as appropriate.

## Children Absent or Missing from Education specific procedures

If teachers suspect that a child is absent or missing from education (e.g. a child is absent without satisfactory reason, or leaves school suddenly without good reason), they should speak to the DSL. The DSLs check the admission and attendance registers regularly to look for patterns. The School checks that children have started at their new establishment after they leave Ipswich School with the new school/establishment. The School will notify the Local Authority within 5 days when any child leaves or joins the School at a non-standard transition point. Any child deemed to be missing from education is reported to the local authority.

## Child-on-child allegations specific procedures

If you are concerned about child-on-child abuse or if this has been disclosed to you the DSL should be notified as soon as possible. Concerns may be around acts of banter, sexual assaults or violence, gender-based issues, sexting, physical abuse or hazing (initiation activities). Hazing will never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up'. Child-on-child abuse can take place in or **out** of school and must be taken seriously regardless of location or whether face to face or online. The DSL will decide whether to refer these allegations to Suffolk Safeguarding Partnership and Children's Services in line with normal procedures. It is understood that in the event of child-on-child abuse that all children involved, whether perpetrator or victim, are treated as being 'at risk' and will be offered appropriate support. The Behaviour Policies in all sections of Ipswich School outline procedures to minimise the risk of child-on-child abuse.

Further details about child on child abuse can be found in **Annex 6**.

## How will I know what has happened as a result of the referral?

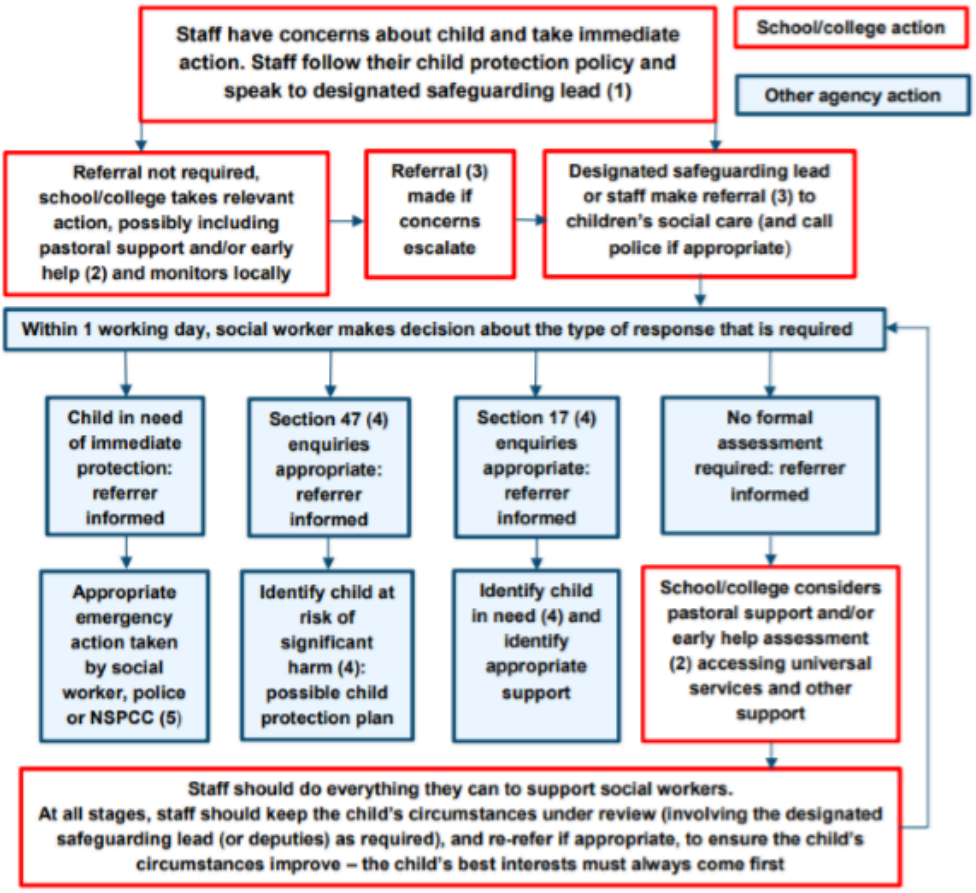
The DSL will ensure that you are informed of the outcome on a 'need to know' basis. Any information shared with a member of staff in this way must be held confidentially to themselves.

## Will I be personally liable if my concern proves to be unfounded?

**No –** You are merely reporting a concern; not making an accusation. Any legal responsibility is the School's and you will only be criticised for failing to follow the procedures.

**Don't delay** – delays may literally be fatal. Ask yourself this question, "What is the worst thing that can happen if I do not act?" Make this a priority.

## Summary of actions where there are concerns about a child:




## What support is available for staff?

The Safeguarding Children procedures have been designed to foster a supportive structure for those staff who have to deal with the victims of abuse. It would be wrong and damaging to ignore the emotions that are generated by this experience.

**You should never feel that you are without support when you are closely involved with such cases.**

Further guidance and procedures for safeguarding children are available at www.suffolksp.org.uk. Please refer to Appendix 4 for a list of useful external agencies.

## What should I do if a pupil alleges that they have been abused by a member of staff, volunteer or the Head?

Listen to the child, reassure them, make a careful note of what the pupil has to say, do not quiz the child and **say nothing to the alleged abuser or the child's parents.** Allegations **must** be reported to the Prep Head, the Head or Chair of Governors (as appropriate). In order to ensure the child's safety and to protect innocent staff from malicious allegations, it is **vital** that you exercise complete discretion in these circumstances. The School will not undertake investigations without prior consultation with Suffolk Safeguarding Partnership.

- If the allegation made is in relation to the Prep Head, then report the matter immediately to the Head.

- If the allegation made is in relation to the Head, or if the Head is absent, then report the matter immediately to the Chair of Governors (without the Head being informed if the allegation is about him) or, in his absence, the Vice-Chair of Governors.
- If the allegation made is in relation to the Chair of Governors then report the matter immediately to the Vice-Chair of Governors.

The Chair and Vice-Chair of Governors can be contacted, in confidence, via the Director of Finance and Operations and Clerk to the Governing Body (email: jmh@ipswich.school, direct line telephone: 01473 408853). The Chair of Governors will pass the information on to the LADO (Local Area Designated Officer in the Police)

The LADO can be contacted via Customer First on 0808 800 4005 or directly on 0300 123 2044: see link to further LADO contact information here: LADO@suffolk.gov.uk and will be contacted immediately and will oversee any allegation or suspicion of abuse directed against anyone working in the School.

The School will consider, after discussions with the LADO, whether the circumstances warrant that the member of staff should be suspended or whether alternative arrangements should be put in place.

Part 4 of the DFE Statutory Guidance *Keeping Children Safe in Education* gives further guidance on this issue.

Where a staff member feels unable to raise an issue with the relevant management, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- general guidance on whistleblowing can be found via: Advice on Whistleblowing
- the NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection, failures internally or have concerns about the way a concern is being handled by our school. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

# 8. Low Level Concerns

Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in the School's Professional Conduct and Standards Policy needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

The Low Level Concerns Policy enables all staff to share any concerns – **no matter how small** – about their own or another member of staff's behaviour with the Head or Prep Head. Safeguarding and promoting the welfare of children is everyone's responsibility. Where a staff member has a concern about the behaviour of the Head, the Chair of Governors should be contacted.

More detailed information about Low Level Concerns can be found in the School's Low Level Concerns Policy.

Recording of a Low Level Concern - see **Appendix 2**.

# 9. Staff/Pupil Relations

In an age in which reported instances of child abuse have become more numerous and in which people in general are more litigious, colleagues are advised that they should observe the following guidelines in order to ensure two things:

(i) That all pupils at Ipswich School feel comfortable and secure in their relationships with members of staff. It cannot be emphasised enough that any actions which pupils may reasonably interpret as improper are unacceptable in themselves no matter how good the intention. No relationship, other than the professional one of an adult working in a school with pupils (even if those pupils are over the age of 18 years), is permitted. Staff should also be aware of the potential for peer abuse if such a relationship developed.

(ii) To protect staff against allegations of improper conduct.

***1. Individual interviews with pupils***

One to one interviews in closed room situations should only take place during times when the immediate vicinity is well populated. It is best practice to ensure that the door to the room you are in has a window. To carry out such interviews beyond the normal working day could cause worry to pupils and could place a member of staff in a compromising situation. ('Normal working day' means between 8.00am and 5.00pm for most activities, though this may reasonably be lengthened to allow for, say, a sports match or a play or music rehearsal finishing at a later time.) If it is anticipated that an interview may prove confrontational, the presence of a second adult is advised.

***2. Transport of pupils***

Colleagues should **not** give lifts in their cars to individual pupils. If this is unavoidable, the pupil should travel in the back seat and permission should be obtained from the parent/guardian as well as the DSL.

***3. Home Visiting***

Colleagues should **not** visit pupils at their home unless a parent is present. Colleagues should **not** invite a pupil to their home alone.

***4. Outings***

Colleagues should **not** take individual pupils on any outings. Consent forms completed by a parent/guardian should always be used for pupils when undertaking out of school activities.

***5. Communications***

All communications between staff and pupils should take place within clear and explicit boundaries and, usually, for professional reasons only. For the purposes of this Policy, communication includes interaction while:

- involved in off-site activities
- using technology such as: mobile phones, social networking websites, blogs, cameras, videos, webcams and e-mail.

*Please refer to the Staff IT Acceptable Use policy for further information.*

***6. Individual Music Lessons and Individual Sports Coaching***

All individual music lessons and sports coaching will take place according to timetables known by the Head of Department. All doors to rooms where individual coaching and lessons take place have windows in and the areas are well-populated. If a member of staff is concerned about their working environment, they should contact their Head of Department.

***7. Use of lifts***

Staff are advised not to use the lifts with an individual pupil. Further guidance can be found for Senior School staff in the Policy C*ommunication with Pupils.*

***8. Intimate Care***

Intimate care tasks are associated with bodily functions, body products and personal hygiene that demand direct or indirect contact with, or exposure of the genitals. Examples include support with dressing and undressing (underwear), helping someone use the toilet or washing intimate parts of the body.

It is generally expected that most children will be toilet trained and out of nappies before they begin at school or the Pre School class. However it is inevitable that from time to time some children will have accidents and need to be attended to.

EYFS (Pre School and Reception classes) and Key Stage 1 staff (Lower Prep) have access to either the Pre School class toilets or the disabled toilet in the Lower Prep corridor. When helping a child with intimate care the member of staff will always inform others as to what they are doing and the toilet door is propped open to allow privacy without isolation. In the Lodge Day Nursery the toilets are open and the nappy changing area does not have a door upstairs. The downstairs door should remain open whilst a child is being changed. There is a stock of baby wipes, plastic bags and disposable protective gloves which staff have available to use. If a child soils him/herself during school/nursery time, a member of staff will help the child:

- to remove their soiled clothes
- clean skin (this usually includes bottom, genitalia, legs, feet)
- dress in the child's own clothes or those provided by the school
- double wrap soiled clothes in plastic bags and give to parents to take home.

In the event of a child in the Upper Prep having an accident, the same procedure will be carried out but will be supervised by office staff who will use the disabled toilet in the Upper Prep.

See also the Nappy and Toilet Changing policy and Intimate Hygiene Policy for The Lodge Day Nursery.

***9. Crossing Patrol from Senior School to Prep and vice versa***

Pupils below Year 9 will be crossed over Ivry Street by the designated crossing patrol between the hours of 8am and 4.30pm. Children report to the Upper Prep Office, Music School Office or School Office to request a crossing. The crossing patrol officer ensures the children are escorted between the Senior

School Holly Rd/Great School gate and Prep premises safely. The crossing patrol always has radio contact with both offices and the Estates team.

Ipswich School staff should make reference to and follow the guidance over appropriate behaviour of staff outlined in the Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings 2022 issued by the Safer Recruitment Consortium, attached as an appendix (and issued to all new staff when they join).

Any queries regarding this guidance can be raised with the relevant Designated Safeguarding Lead.

# 10. Missing Pupils

Separate policies exist for the protocols to be followed for finding missing pupils in The Lodge Day Nursery, the Prep School, in the Senior School, and from the Boarding House and for children who are absent or missing from education.

# 11. Online Safety

The DSL is responsible for liaising with the Director of IT to ensure all firewall and filtering policies are in place and monitored on a regular basis to ensure children are protected from harmful content. In accordance with KCSIE 2026, the SLT Filtering and Monitoring Lead, working alongside the DSL and IT Lead, conducts and documents annual filtering and monitoring reviews, maintaining actively updated records across all school devices and networks. Please refer to the Online Safety Policy and Acceptable Use Policy

The School recognises that cyber security and online safeguarding are intrinsically linked. Under KCSIE, safeguarding pupils includes protecting them from involvement in cybercrime (as potential victims or perpetrators) and ensuring the school's digital infrastructure is resilient against external threats, data breaches, and unauthorised network access."

# 12. Photography and Privacy

**Parents, carers or relatives** may only take photos or video recordings of pupils in School/Nursery or on School/Nursery-organised activities with prior consent of the Head/Manager and in designated areas. If parents do not wish their children to be photographed, filmed or for photos to be used in School/Nursery publications and promotional material, and have completed the permission slip to assert this, then their rights will be respected.

**School staff** may use photographic and video evidence to demonstrate pupil achievement and progress appropriate to the School's/Nursery's curriculum and may be presented in pupils' books or development records. In all cases of recording such information, School/Nursery cameras/tablets are used. These are only taken off site to record evidence of out of school/Nursery learning, for example on a School/Nursery trip. Stored footage or photographs taken remain electronically in School//Nursery.

Staff are permitted, in exceptional circumstances, to use their own mobile devices to record such evidence (but only for Year 1 children upwards. **For children in EYFS, a school device must always be**

**used)**. The recorded material must then be transferred to the School's storage area only, in School//Nursery by the next working day and must be deleted from the personal device.

However, **photos cannot be taken in the swimming pool or changing areas at any time without prior permission from the Prep Head or Head.**

# 13. Mobile Devices (Mobiles, Devices and Cameras) - Prep and Senior School

To maintain a focused learning environment, protect pupils from online exploitation, and prevent digital distractions, the Senior and Prep schools operate as mobile phone-free spaces by default during instructional and unstructured daytime hours.

Staff are not permitted to use their own mobile phones or devices for contacting children, young people or their families within or outside of the School or setting in a professional capacity, except in exceptional circumstances.

Staff will be issued with a School phone where contact with pupils, parents or families is required.

Mobile phones, smart watches and personally-owned devices will be switched off or switched to 'silent' mode. Bluetooth communication should be 'hidden' or switched off. Mobile phones or devices will not be used during teaching periods unless permission has been granted by a member of the senior leadership team in exceptional circumstances. During teaching periods, these devices should be in a person's pocket or in a drawer/cupboard.

In EYFS, or in cases when intimate care is required for a pupil, mobile phones and personally-owned devices will be kept in staff lockers or cupboards during the working day.

If members of staff have an educational reason to allow children to use a personal device as part of an educational activity then it will only take place when approved by the senior leadership team.

If a member of staff breaches the School policy then disciplinary action may be taken.

Where staff members are required to use a mobile phone for School duties, for instance in case of emergency during off-site activities, or for contacting pupils or parents, then a School mobile phone will be provided and used where possible. In an emergency where the staff member does not have access to a School owned device, they should use their own devices and hide (by inputting 141) their own mobile numbers for confidentiality purposes. Personal mobile devices can be used to register and sign out children from activities within and without school if a school device is not available.

All parent helpers will be requested to place their bag containing their mobile phone in a secure area or another appropriate location and asked to take or receive any calls in the staff room or office.

All traffic to/from the internet at Ipswich School is filtered and monitored.

# 14. Mobile Devices (Mobiles, Devices and Cameras) in the Lodge Day Nursery

Mobile phones and personally-owned devices will be switched off or switched to 'silent' mode, Bluetooth communication should be 'hidden' or switched off and personal mobile phones or devices will not be used within the Nursery plays rooms and areas.

Mobile phones and personally-owned devices will be kept in staff lockers or cupboards during the working day. If a member of staff needs to be contacted during the working day in an emergency, their phone may be left in the office and the member of staff will be contacted if it rings.

Parents and visitors should turn their phones and devices off when entering the play rooms and areas.

Staff may be asked to take their personal mobile phone if they are taking children out of the Nursery on a trip. In this case the phone should only be used for contact between the member of staff and the Nursery and for no other purpose.

# 15. Disqualification from Childcare

The School must not knowingly employ people in childcare who are disqualified. Childcare is defined as education and care provision for children in the EYFS at any time of day. For children above Reception age but under 8 years old, childcare is considered to be crèche-like/wrap around facilities which take place before and after school.

- The School will inform relevant people of the legislation (or ensure they have been informed by others).
- Information is provided on the Self Declaration Form for shortlisted candidates for employment and in all contracts of employment and on the annual staff/governor declaration.
- The School will keep records, including the date disqualification checks were completed.

Where we are satisfied that a person working in the relevant parts of Ipswich School falls within one of the disqualified criteria, the School will inform Ofsted and follow the relevant procedure: Disqualification under the Childcare Act 2006 - GOV.UK

If an allegation is made against a person living or working at the premises, or any other abuse is alleged to have taken place at the premises, it will be recorded and it will be reported to Ofsted, and all other relevant regulatory bodies as required, within 14 days.

# 16. Pupil Awareness

Child Protection awareness and advice is delivered by the School's PHSE scheme. All children and students at Ipswich School are taught about safeguarding themselves, including online through the curriculum and PSHE (Life Skills) according to their age and stage. Sixth Form pupils are given an annual training session led by the DSL. Online Safety is also delivered through the PSHE scheme by the School's Online Safety trained officer or through trained agencies that are brought into School. Particular attention is paid to help children to adjust their behaviours in order to reduce risks and build resilience, including radicalisation, with particular attention to the safe use of electronic equipment and the

internet. Children will be taught about the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people. The latest resources promoted by DFE can be found at:

- The use of social media for on-line radicalisation
- The UK Safer Internet Centre www.saferinternet.org.uk
- CEOP's Thinkuknow website www.thinkuknow.co.uk

# 17. Staff and Governor Training

All staff and volunteers, including temporary staff will be advised, as part of their induction, about their child protection duties and responsibilities. All new staff meet with the relevant DSL to understand the DSL role. This will include ensuring all relevant persons have read and understood the following:

- The School's Child Protection and Safeguarding Children Policy (and appendix), including the Guidance document
- The School's Low Level Concerns Policy
- The School's Child on Child Abuse Policy
- The School's Online Safety Policy and the Filtering and Monitoring Systems
- Statutory guidance included in the Department for Education publication Keeping Children Safe in Education. All staff must read Part 1. (Annex A removed)
- Professional Conduct and Standards Policy, including the teaching staff code of conduct and whistleblowing procedure
- The School's Equality, Diversity and Inclusion Policy
- The School's policies relating to missing pupils and behaviour
- Information regarding The Prevent Strategy
- The identity of the Designated Safeguarding Lead for the Senior School, Prep and The Lodge Day Nursery.

Staff will receive approved safeguarding children training every three years, or at such shorter intervals as required by the Suffolk Safeguarding Partnership and at regular, shorter intervals to appropriately update staff. There will also be periodic training about recent changes in legislation and advice over safe interactions with children. Specific guidance may be passed on by the DSL, the Head, Prep Head, Lodge Day Nursery Manager or deputies in relation to particular subject areas (e.g. Physical Education) or activities (e.g. residential camps) to the Head of Department in charge. Individual training on Child Protection issues is also available through the INSET budget and staff should approach the Prep Head or Senior Deputy Head (Pastoral) regarding any such training needs.

Each time Keeping Children Safe in Education is updated by the DfE, this policy is updated and staff are provided with training updates. Staff are required to sign a declaration annually to ensure they have read and understood the latest version of KCSIE.

The Director of Finance and Operations will ensure appropriate guidance and training is given to support staff in the light of recommendations received from the Designated Safeguarding Lead.

# Appendix 1 - Summary of Key Personnel : 2026-27

**Governors receive Safeguarding training every 2 years*

| **Name** | **Roles** |
|---|---|
| Mr Nigel Farthing | Chair of Governors with responsibility for any allegations or concerns are made about the Head |
| Ms Anna Hennell James | Governor with responsibility for Safeguarding* |
| Dr Rosemary Gravell | Governor with responsibility for Safeguarding (in the absence of Ms Hennell James)* |
| Mrs Sarah Barrett | Deputy Head Pastoral, Head of Boarding, Designated Safeguarding Lead (DSL) - Senior School |
| Miss Rebecca Halford-Thomspon | Matron, Deputy Designated Safeguarding Lead (DDSL) - Senior School |
| Mr Nick Gregory | Head - Senior School |
| Mrs Jennifer Hunwicke | Director of Finance and Operations and Clerk to the Governing Body |
| Mrs Lucy Southgate | Prep Head and Deputy Designated Safeguarding Lead (DDSL) - Prep School |
| Mrs Amy Barber | Assistant Head Prep School and Designated Safeguarding Lead (DSL) - Prep |
| Mrs Alison Werrey-Easterbrook | Head of Learning Enhancement and Deputy Designated Safeguarding Lead (DDSL) - Prep |
| Miss Hayley List | Manager, The Lodge Day Nursery and Designated Safeguarding Lead (DSL) for the Nursery |
| Miss Megan Parker-Hardman | Deputy Manager, The Lodge Day Nursery and Deputy Designated Safeguarding Lead (DDSL) for the Nursery |
| Mrs Mandy McPherson | Finance Administration Officer, The Lodge Day Nursery and Deputy Designated Safeguarding Lead (DDSL) for the Nursery |
| Mr Stuart Dove | Online Safety Lead - Senior School |
| Mrs Rachel Bryanton | Online Safety Lead - Prep School |
| Miss Sophie Bugden | Online Safety Lead - Prep School |

# Appendix 2 - Handling low-level concerns made against teachers and other staff, including supply teachers and volunteers

**Summary of Concern**

**Please retain in personnel file**

**Explanatory statement:**

This statement is made in accordance with Keeping Children Safe in Education 2026

https://assets.publishing.service.gov.uk/media/6a4cf903b7203c4c023fd2f3/Keeping_children_safe_in_education_2026_.pdf

This document covers the outcome of low-level concerns in respect of employees, supply staff and volunteers working within Suffolk schools.

All low-level concerns should be recorded in writing, including details of the concern, the context in which the concern arose, and how the concern was followed up and resolved, and a note of any action taken, and decisions reached.

- This record will be kept by the school and should be placed on an employee's confidential personnel file held by the school or held centrally for staff employed centrally by multi academy trusts.
- A copy of the form will be provided to the person concerned
- If the employee refuses to sign the completed form within 5 working days (one calendar week) this should be noted on the form.

The purpose of this record is to enable records to be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of behaviour moves from a concern to meeting the harm threshold, it should be referred to the LADO.

The record should be retained at least until the individual leaves their employment.

Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Allegations should be dealt with in accordance with Part 4 Section 2 of Keeping Children Safe in Education and Suffolk Safeguarding Partnership's "Arrangements for managing allegations of abuse against people who work with children or those who are in positions of trust".

**HIGHLY CONFIDENTIAL**

**Record of low-level concern**

| | |
|---|---|
| **Name of employee/ supply staff/ volunteer** | |
| **Position held** | |
| **Name of person completing this form** | |
| **Position held** | |

**Summary of low-level concern(s):**

**(Including date(s) and contextual information)**

**Initial action taken and decisions reached:**

**How low-level concern was followed up and by whom:**

**(Including date and membership of any consultations and meetings held)**

**Outcome of investigation: ***

**(Including rationale)**

**If applicable, outcome of any formal disciplinary hearing (including date of outcome letter sent to employee):**

**If applicable outcome of any formal appeal hearing (including date of outcome letter sent to employee).**

**For low-level concerns, if the concern(s) relate to misconduct or poor performance, is the individual aware this information will be referred to in any future reference?**

**Yes / No** (NB references must be factual and not contain opinion)

**Employee Comments:**

**Signed / Dated:**

**Headteacher : ……**

**Date:**……..

**Employee : ……**

**Date:** ……..

A copy of this form should be retained confidentially in the Low Level Concerns file held by the Head, or Prep Head. A note will be put on the personnel file (to indicate there is further detailed information in the Low Level Concerns File) for the individual at least until they leave employment with the school.

# Appendix 3 - Reporting Form link (historic card used, but may occasionally be used by Lodge Staff)

**Safeguarding Report Card (hard copies held at the main Reception desks)**

# Appendix 4 - External Agencies

The School's safeguarding practices are agreed with the local agencies, and specifically with the Suffolk Safeguarding Partnership (SSP). The Safeguarding Children Policy is available on the School's website and vacancies page.

This list is not exhaustive, but may provide some useful links to external agencies for support with safeguarding.

**Suffolk Safeguarding Partnership (SSP)**

The Suffolk Safeguarding Partnership (SSP) strives to provide a swift and comprehensive response to any questions you may have.

If the matter is urgent because a child or adult is in immediate danger, phone 999.

If your enquiry is regarding specific concerns about a Child or an Adult, please contact Customer First directly. The SSP do not accept referrals, and are unable to help with these types of queries. Contact details can be found on our website here: Concerned? See it? Recognise it? Report it?

To contact the partnership please email: enquiries@suffolksp.org.uk

**Customer First**

Customer First is the first point of contact for social services in Suffolk. We deal with enquiries and referrals about adults, children and mental health assessments.

**Call 0808 800 4005 (free from landlines and most mobiles)**

Opening hours are Monday to Thursday 8am to 5:20pm, Fridays 8am to 4:20pm (excluding bank holidays). Outside these hours this number will divert to the Emergency Duty Service who can deal with any matters that cannot wait until the next working day.

**NSPCC Whistleblowing Advice Line**

If you're worried about a child protection issue in your organisation, you can "blow the whistle" by following your organisation's whistleblowing policy, or by raising it with our Whistleblowing Advice Line.

https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

Tel: 0800 0280285

# Appendix 5 - DSL Job Description

IPSWICH SCHOOL

**(INCLUDING IPSWICH PREPARATORY SCHOOL AND EARLY YEARS FOUNDATION STAGE [EYFS])**

**Role of the Designated Safeguarding Lead (DSL)**

Governing bodies and proprietors should ensure that the school or college designates an appropriate senior member of staff to take lead responsibility for child protection. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

The current Designated Safeguarding Leads and Deputy DSLs at Ipswich School are:

**The Lodge Day Nursery**
Hayley List (DSL)

Megan Parker-Hardman (Deputy DSL)
Mandy McPherson (Deputy DSL)
**Prep**
Amy Barber (DSL)

Lucy Southgate (Deputy DSL)
Alison Werrey-Easterbrook (Deputy DSL)

**Senior School**
Sarah Barrett (DSL)

Rebecca Halford-Thompson (Deputy DSL)

**Governor with responsibility for Safeguarding**
Anna Hennell James
The broad areas of responsibility for the designated safeguarding lead are:

**Managing referrals**

- Refer all cases of suspected abuse to the local authority children's social care.
- Refer to the local authority designated officer (LADO) for child protection concerns (all cases which concern a staff member).
- Referral (in discussion with the Head of Prep/Head) to Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child) and/or Police (cases where a crime may have been committed).

- Liaise with the Head of Prep/Head to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Manage referrals to the Channel Panel with regards to the Prevent Duty.
- Know about child protection case conferences and reviews and contribute to these effectively when required.

**Training**

The designated safeguarding lead should receive appropriate training, updated at least every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as early help assessments.
- Have a working knowledge of how Suffolk Safeguarding Children's Board conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff.
- Be alert to the specific needs of children in need including those children with special educational needs and young carers.
- Keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- Ensure all staff are trained in the Prevent Duty.

**Raising Awareness**

- Ensure the School's policies are known and used appropriately.
- Ensure the School's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this.
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this.
- Link with the local SSP to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- When children leave the School, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file.
- Ensure that children who leave or join the School are recorded as such with Suffolk County Council in line with the Children Missing in Education Statutory Guidance.
- Ensure all staff are aware of online safety issues and ensure children receive appropriate training.
- Provide regular briefings and updates at staff, departmental and governor meetings to ensure that everyone is kept up to date on latest policy development and reminded of their responsibilities.

# Appendix 6 - Child on Child abuse

## 1 The School's responsibilities

### Introduction

The governors, senior leadership team, and all staff (which term shall apply to all volunteer staff members) at Ipswich School (the School) are committed to the prevention, early identification, and appropriate management of child-on-child abuse (as defined below) both within and beyond the School.

In particular, we:

- believe that in order to protect children, all schools should (a) be aware of the nature and level of risk to which their students are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and (b) take a whole-school community Contextual Safeguarding approach to preventing and responding to child-on-child abuse,
- regard the introduction of this policy as a preventative measure. We (a) do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it; and (b) believe that in order to tackle child-on-child abuse proactively, it is necessary to focus on all four of the following areas: (i) systems and structures; (ii) prevention; (iii) identification; and (iv) response/intervention,
- recognise national and increasing concern about this issue, and wish to implement this policy in order to mitigate harmful attitudes and child-on-child abuse in the school setting, and
- believe that parents should hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any child, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.

### This policy

This policy:

- Is the School's overarching policy for any issue that could constitute child-on-child abuse. It relates to, and should be read alongside, the School's Child Protection and Safeguarding Policy and any other relevant policies including, but not limited to, Anti-Bullying (including cyberbullying), Online Safety and AI Use, Data Protection and Retention of Records, Children Missing in Education, Behaviour and Discipline, Suspensions and Exclusions, and (where relevant) Weapons.
- applies to all governors, the senior leadership team, and staff. It is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed. A number of staff and students are involved in each annual review which involves, and is informed by, an assessment of the impact and effectiveness of this policy over the previous year,
- recognises that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up',
- is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (September 2026),

- Our School takes a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused a child, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised another child, parents or adults in the community prior to their abuse of children,
- uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to child-on-child abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all students, regardless of age. Although the starting point is that the School's response to child-on-child abuse should be the same for all students, regardless of age, there may be some different considerations in relation to, for example, a child aged under 10, or a student aged 18 or over in terms of how local agencies and/or partners respond. This, for example, is likely to be different on the part of local authorities, given that their safeguarding duties are limited, in the case of children's social care – save for a number of specific exceptions – to children and, in the case of adult social care services, to adults with care and support needs. Similarly, the School's response to incidents involving the exchange of youth involved sexual imagery or Synthetic Media will need to differ depending on the age of the students involved. There is also likely to be a more significant criminal justice response in relation to any student responsible for abuse who is aged 18 or over,
- Should be read in conjunction with the DfE's statutory guidance on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges, statutory advice on Working Together to Safeguard Children, and any relevant practice guidance issued by the Suffolk Safeguarding Partnership.
- should be read in conjunction with Suffolk Safeguarding Partnership's Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

## 11 Understanding child-on-child abuse

**What is child on child abuse?**

For these purposes, child-on-child abuse is any form of physical, sexual, emotional, and financial abuse, as well as coercive control, exercised between children within their relationships (both intimate and non-intimate), friendships, and wider peer associations.

Child-on-child abuse can take various forms, including (but not limited to):

- Serious bullying (including cyberbullying and digital harassment)
- Relationship abuse, domestic violence, and intimate partner abuse
- Child sexual exploitation (CSE) and child criminal exploitation (CCE / County Lines)
- Youth and serious youth violence
- Harmful sexual behaviour (HSB)
- Prejudice-based violence, including Violence Against Women and Girls (VAWG), misogyny, and hate-based harassment

Examples of online child-on-child abuse include:

- Sexting and the sharing of youth-involved sexual imagery
- Non-consensual AI-generated nudes, semi-nudes, or deepfake sexual imagery
- The creation, alteration, or distribution of synthetic sexualised media
- Digital grooming via interactive or conversational AI tools
- Exposure to, or propagation of, harmful online influencers, misogynistic material, or extreme online content

**What is Contextual Safeguarding?**

This policy:

a) encapsulates a Contextual Safeguarding approach, which is about changing the way that professionals approach child protection when risks occur outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children may have encountered child-on-child abuse.

b) adopts a whole-school community Contextual Safeguarding approach, which means:

- being aware of and seeking to understand the impact that these wider social contexts may be having on the School's students,
- creating a safe culture in the School by, for example, implementing policies and procedures that address child-on-child abuse and harmful attitudes; promoting healthy relationships and attitudes to gender/ sexuality; hotspot mapping to identify risky areas in the School; training on potential bias and stereotyped assumptions,
- being alert to and monitoring changes in students' behaviour and/or attendance, and
- contributing to local child protection agendas by, for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies (see section entitled 'multi-agency working').

**How prevalent is child on child abuse?**

Research suggests that child-on-child abuse is one of the most common forms of abuse affecting children in the UK. For example, more than four in ten teenage schoolgirls aged between 13 and 17 in England have experienced sexual coercion. Two thirds of contact sexual abuse experienced by children aged 17 or under was committed by someone who was also aged 17 or under.

**When does behaviour become problematic or abusive?**

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

**Sexual behaviours**

Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student's sexual behaviour and deciding how to respond to it.

Link:
https://www.icmec.org/wp-content/uploads/2019/07/Hackett-Continuum-of-Harmful-Behavior-Excerpted.pdf

Hackett's continuum relates exclusively to sexual behaviours and is not exhaustive. The Brook Sexual Behaviours Traffic Light Tool can help professionals working with children to distinguish between three levels of sexual behaviour – green, amber and red, and to respond according to the level of concern. Link: https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/

**Other behaviour**

When dealing with other alleged behaviour, which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable,
- involves a single incident or has occurred over a period of time,
- is socially acceptable within the child group,
- is problematic and concerning,
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability,
- involves an element of coercion or pre-planning,
- involves a power imbalance between the child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power, and
- involves a misuse of power.

**How can a child who is being abused by other children be identified?**

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

**Looking behind students' behaviour**

The School's safeguarding team regularly reviews behaviour logs and attendance patterns to identify emerging risks early.

Staff must remain alert to factors that increase a child's vulnerability to peer abuse, including:

- **SEND Status:** Children with Special Educational Needs and Disabilities (SEND) are statistically more vulnerable to peer abuse and bullying. Staff must ensure that behavioural changes or distress are not mistakenly attributed solely to a child's disability.
- **Gender-Questioning & Sexuality:** Children exploring or questioning their sexuality or gender identity are disproportionately targeted for peer abuse and require robust support frameworks.
- **Protected Characteristics:** Belonging to minority ethnic, religious, or cultural groups can increase vulnerability to prejudice-based abuse.

## 111 A whole school approach

**School Environment**

The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- educating all governors, its senior leadership team, staff, students, and parents about this issue. This includes: training all governors, the senior leadership team, and staff on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify, and respond to it. This includes (i) Contextual Safeguarding, (ii) the identification and classification of specific behaviours, including digital behaviours and digital risks (including generative AI and synthetic media), (iii) the importance of taking seriously all forms of child-on-child abuse (no matter how 'low level' they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing, and (iv) social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.
- educating children about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse, misogyny, discrimination and peer intimidation. Educating students about consent includes teaching them basic facts such as (i) a child under the age of 13 can never consent to any sexual activity; (ii) the age of consent is 16; and (iii) sexual intercourse without consent is rape.
- engaging parents on these issues by:
  - talking about them with parents, both in groups and one to one,
  - asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks,
  - encouraging parents to hold the School to account on this issue, in part as a result of visibility of the policy.
- Supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs. These interventions can be 'de-clinicised' and brokered through a positive relationship with the School and its staff. All staff are trained to meet low-level mental health difficulties within the students.
- working with governors, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community.
- creating conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole-school culture:
  - which is founded on the idea that every member of our School community is responsible for building and maintaining safe and positive relationships, and helping to create a safe School environment in which violence and abuse are never acceptable,

- in which students are able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts,
- in which students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to,
- which (i) proactively identifies positive qualities in students; (ii) nurtures these qualities; (iii) teaches and encourages students to think about positive hopes for the future; and (vi) supports students in developing small-scale goals that enable realistic ambitions, and
- which provides supervised activities to students that give them the experience of having their needs met that might otherwise apparently be met in abusive circumstances. These can include experiencing (i) status; (ii) excitement; and (iii) a degree of risk,

- responding to cases of child-on-child abuse promptly and appropriately, and
- ensuring that all child-on-child abuse issues are fed back to the School's safeguarding lead so that they can spot and address any concerning trends and identify students who may be in need of additional support, challenging the attitudes that underlie such abuse (both inside and outside the classroom).

**Multi agency working**

The School actively engages with Suffolk Safeguarding Partnership in relation to child-on-child abuse, and works closely with, for example, children's social care, the police, MASH and other schools.

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early, and appropriately handle cases of child-on-child abuse. They help the School to: (a) develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist; (b) ensure that its students are able to access the range of services and support they need quickly; (c) support and help inform the School's local community's response to child-on-child abuse; (d) increase the School's awareness and understanding of any concerning trends and emerging risks in its local area to enable it to take preventative action to minimise the risk of these being experienced by its students.

The School actively refers to local multi-agency arrangements under the statutory Family Help framework and statutory child protection structures. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the alleged incident cannot appropriately be managed internally by the School itself) to try to address the issue alone – it requires effective partnership working.

## Responding to concerns or allegations of child-on-child abuse

**General principles**

It is essential that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School environment.

Any response should:

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation,
- treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The School should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter,
- take into account:
  - that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider sociocultural contexts – such as the child's/ children's child group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk, and
  - the potential complexity of child-on-child abuse and of children´s experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting,
  - the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/ children and their parents, and obtain consent to any referral before it is made. The School should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

**What should you do if you suspect either that a child may be at risk of or experiencing abuse, or that a child may be at risk of abusing or may be abusing others?**

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by another child/children, or that a child may be at risk of abusing or may be abusing another child/children, they should discuss their concern with the DSL, or for lower level concerns, the appropriate Pastoral Manager, without delay so that a course of action can be agreed.

**Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately.**

**Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.**

If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement.

**How will the School respond to concerns or allegations of child-on-child abuse?**

The DSL will discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

Where concerns involve youth-involved sexual imagery or AI-generated synthetic media/deepfakes, the Designated Safeguarding Lead (DSL) will take immediate action to mitigate online dissemination. This includes reporting content to the Internet Watch Foundation (IWF) and liaising with the Police / CEOP Command for image removal and investigation.

The Internet Watch Foundation (IWF), for example, has a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police.

DSLs should always use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required.

In borderline cases the DSL may wish to consult with children's social care and/or MASH on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL should contact children's social care and/or the police immediately and, in any event, within 24 hours of the DSL becoming aware of the alleged behaviour. The DSL will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

A **Manage internally with help from external specialists where appropriate and possible.** Where the alleged behaviour between children is abusive or violent (as opposed to inappropriate or problematic – unless as stated above), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle concerns or allegations internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

B **Family Help / Targeted Early Help)**: Contributing to an inter-agency assessment under the statutory Family Help framework to provide targeted services (e.g., specialist harmful sexual behaviour teams, CAMHS, youth services).

C **Refer the child/children to children's social care for a section 17/47 statutory assessment:** Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's

social care in the area where the/each child lives. Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment of the referral, in accordance with that area's assessment framework. As a matter of best practice, if an incident of child-on-child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.

D **Police Referral**: Reporting alleged criminal behaviour (including violent assaults, extortion, non-consensual creation/sharing of deepfake sexual media, or serious sexual offences) directly to the Police.

**Safety plans**

The School will always carry out a safety plan in respect of:

- any child who is alleged to have behaved in a way that is considered to be abusive or violent,
- any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child, or
- any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL.

Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgement – based on the particular concern(s) and/or allegation(s) raised, and the needs and circumstances of the individual child/children in question – to determine whether (as explained above) it would be appropriate to contact children's social care, and to carry out a safety plan.

Careful judgement and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might actually be harmful to another child. Consultation is recommended with children's social care if there is any doubt about this. Careful consideration should also be given to a range of factors (which are outlined in Appendix A) including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring.

Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

**Information sharing, data protection and record keeping**

When responding to concern(s) or allegation(s) of child-on-child abuse, the School will:

- always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals,

- Early information sharing is vital and data protection laws do not prevent sharing information to keep a child safe
- record the information that is necessary for the School and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved,
- keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and
- be mindful of and act in accordance with its safeguarding and data protection duties, the Data (Use and Access) Act 2025 and including those set out in Working Together to Safeguard Children (July 2018)74 and the HM Government advice on Information Sharing (updated in July 2018).

**Disciplinary action**

The School may wish to consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the School works in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/ or children's social care, the School may still need to consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action may sometimes be appropriate, including to:

a) ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
b) demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and
c) ensure the safety and wellbeing of other children.

However, these considerations must be balanced against any police investigations, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns. Before deciding on appropriate action the School will always consider its duty to safeguard all children in its care from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The School will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. For example, action may still need to be taken by the School in relation to other students who have been involved with and/or affected by child-on-child abuse. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the School. Engaging in Fair Access Panel Processes to assist with decision-making associated to managed moves and exclusions can also be beneficial. In the event of any managed move, consideration must be given to sharing information with the receiving school regarding the child-on-child abuse in order to allow best protection of children in the new school.

Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

**On-going proactive work for a whole-school community Contextual Safeguarding approach**

The School's response to concerns or allegations of child-on-child abuse should be part of on-going proactive work by the School to embed best practice and in taking a whole-school community Contextual Safeguarding approach (defined above) to such abuse. As such the School's response can become part of its wider prevention work. The School should consider:

- What protective factors and influences exist within the School (such as positive child influences, examples where child-on-child abuse has been challenged, etc.) and how can the School bolster these?
- How (if at all) did the School's physical environment or the students' routes to and from the School contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision, or by working with local safeguarding partners to mitigate the risks to students' safety whilst travelling to and from the School?
- How (if at all) did the online environment contribute to the abuse, and how can the School address this going forwards, for example by strengthening the way in which the School encourages positive and safe use of the internet by students?
- Did wider gender norms, equality issues, and/or societal attitudes contribute to the abuse?
- What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forward?
- Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse, or to address any victim-blaming narratives from staff?
- How have similar cases been managed in the past and what effect has this had?
- Does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent child-on-child abuse, including by way of the School's PSHE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work, respect, boundaries, consent, children's rights and critical thinking and/or avoiding victim-blaming narratives?
- Are there any lessons to be learnt about the way in which the School engages with parents to address child-on-child abuse issues?
- Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- Does this case highlight a need to work with certain children to build their confidence, and teach them how to identify and manage abusive behaviour?
- Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

**Supporting Gender-Questioning Pupils and Social Transition**

In accordance with updated *Keeping Children Safe in Education* (KCSIE) guidance, Ipswich School adopts a cautious, safeguarding-led approach to supporting gender-questioning pupils, ensuring that pastoral

care is balanced with parental partnership and statutory obligations. Any expressions of gender questioning or requests for social transition must be reported directly to the Designated Safeguarding Lead (DSL) for formal review rather than managed independently by staff; except in rare circumstances where the DSL determines that doing so would expose the pupil to a clear risk of significant harm, parents and carers will be fully involved in these discussions as the primary decision-makers. Furthermore, the school maintains single-sex provisions; including toilets, changing rooms, residential arrangements, and competitive sports (strictly based on biological sex), while offering appropriate alternative facilities where necessary to ensure the safety, privacy, and well-being of the entire school community.

**APPENDIX A**

**Defining Child-on-Child Abuse**

Incidents of maltreatment among peers seldom occur as isolated events and frequently point toward more extensive safeguarding risks. A youth may find themselves in a situation of sexual exploitation with a contemporary who is himself the victim of domestic aggression or intimidation by older cohorts. Furthermore, instances of sexualized bullying within the educational environment can escalate into full exploitation by peers. For students aged 16 or 17 in detrimental relationships, what might appear as domestic abuse may simultaneously involve elements of sexual coercion or grooming.

The experiences children have with violence and mistreatment are rarely standalone occurrences; rather, they are often intrinsically linked to wider personal circumstances and the social environments they inhabit. Consequently, any institutional response to child-on-child allegations must evaluate the broad spectrum of abuse categories defined within this policy to fully grasp the child's reality. This is achieved by implementing a Contextual Safeguarding framework and ensuring our procedures account for the potential intricacies of every reported case.

**The Concept of Contextual Safeguarding**

Contextual Safeguarding involves shifting the professional focus of child protection to risks occurring outside the domestic sphere. It mandates that everyone within the Local Safeguarding Partnership considers active collaboration with children's social care to foster secure environments where peer abuse may have occurred. Specifically, this framework:

- functions as a protective strategy that acknowledges serious harm within extra-familial settings and integrates these spheres into all safeguarding assessment and prevention efforts,
- understands that as young people transition into their teenage years, they spend a greater proportion of time away from home in public environments (including those online) within which they may experience abuse, and
- considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a school, professionals could work with the school leadership and student body to challenge harmful, gendered school cultures and misogynistic influences, thus improving the pre-existing school environment.

**Identifying and assessing behaviour**

**Sexual Behaviour**

As the NSPCC explains *'children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB.'*

This term has been adopted widely in the field, and is used throughout the NSPCC's, Research in Practice's and Professor Simon Hackett's harmful sexual behaviour framework (which should be used alongside the National Institute for Health and Care Excellence (NICE) guidelines on harmful sexual

behaviour among young people), as well as the child-on-child abuse policy. For the purpose of that harmful sexual behaviour framework, and as adopted in the child-on-child abuse policy, harmful sexual behaviours are defined as *'Sexual behaviours expressed by children…that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child…or adult.'*

Local authorities use a range of assessment and intervention frameworks which can be very helpful in assessing where any given behaviour falls on a continuum.

Staff should always use their professional judgement and discuss any concerns with the DSL. Where an alleged incident involves a report of harmful sexual behaviour, staff should consult the DfE's statutory guidance on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.

**Other behaviour**

When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non-sexual) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider. For example, the issue of consent and the nuances around it, are unlikely to apply in the same way in cases where the alleged behaviour is reported to involve emotional and/or physical abuse, as it could in cases of alleged sexual behaviour which is reported to involve harmful sexual behaviour.

In addition, schools could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical behaviour and digital behaviour (including AI-generated synthetic media, non-consensual deepfake sexual imagery, digital grooming via interactive AI, and online harassment).

It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving youth sexual imagery or synthetic/AI-generated media may be inappropriate in one context, for example, when exchanged between two 11 year old children in a consenting relationship, and abusive in another. For example, when it is:

- (a) shared without the consent of the child in the image;
- (b) produced as a result of coercion or digitally altered using AI technology without authorization; or
- (c) used to pressure the child into engaging in other sexual behaviours.

Behaviour which starts out as inappropriate may escalate to being problematic and then abusive, either quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital, and could potentially prevent their behaviour from progressing on a continuum to becoming problematic, abusive and/or violent – and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies within the statutory Family Help or child protection frameworks. For example, a physical fight between two children may not constitute child-on-child abuse where the fight is a one-off incident, but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual student basis, but could also apply to a cohort of the student body, such as a year group or key stage, or across the student body as a whole.

Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools need to take a whole-school approach in order to prevent escalation. For example, where multiple boys are making inappropriate comments about girls or propagating misogynistic online content, one-off sanctions are unlikely to be effective and wider actions should be considered, such as implementing a bystander intervention model throughout the school, or arranging for an external person to deliver a year group intervention exercise; revising the school's RSHE programme; and/or a discussion around whether anything is happening within the wider community or digital space that might be affecting the students' behaviour.

It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject to the concern(s)/ allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, schools should follow the procedures set out in the child-on-child abuse policy.

**How can a child who is being abused by other children be identified?**

Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected,
- physical injuries,
- experiencing difficulties with mental health and/or emotional wellbeing,
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much,
- broader changes in behaviour including alcohol or substance misuse,
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age, and
- abusive behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive, and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present will depend on their particular circumstances.

Rather than checking behaviour against a list, staff should be trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour and, where appropriate, to engage with their parents so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is

contributing to their behaviour (for example, whether the child is being harmed or abused by another child) and, if so, what the concern is and how the child can be supported going forwards.

Staff must also remain attentive to vulnerability factors that increase a child's susceptibility to child-on-child abuse, including SEND status, children who are gender-questioning or exploring their sexuality, or children belonging to protected characteristic groups.

The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of child-on-child abuse, a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

**Safety plans**

In deciding (a) whether a safety plan would be appropriate; and (b) which children require a safety plan, the DSL should consider:

- the extent to which a child may have experienced or otherwise been affected by the alleged behaviour, and the impact on them. This will depend not only on the child's involvement in or proximity to the alleged behaviour, but also on factors such as their possible wider circumstances and needs, their age and understanding, and the extent to which the alleged behaviour might trouble or distress other children, or expose them to inappropriate sexual behaviour,
- the importance of early intervention to address and to prevent escalation of inappropriate and/or problematic behaviours, and
- whether there are any wider safeguarding concerns about a child, for example where a child's behaviour may be considered to be inappropriate or problematic on Hackett's continuum, or at risk of escalating, the DSL and/or external agencies may determine that a safety plan is required to control emerging risks.

In all cases where a safety plan is not considered to be appropriate, the school should nonetheless take steps to safeguard and support the/each child who is allegedly responsible for the behaviour, and any children affected by it, and should continue to monitor the situation. If risks increase, consideration should again be given to developing a safety plan. A safety plan should be developed in consultation with key statutory agencies to whom any referral and/or report is necessary.

In developing a safety plan the school should

- always have regard to the latest version of Keeping Children Safe in Education (KCSIE 2026), and statutory guidance on Working Together to Safeguard Children, and make a referral to children's social care and, if appropriate, report to the police, whenever a child has been harmed, is at risk of harm, or is in immediate danger. Where a report of rape, assault by penetration or sexual assault is made, this must be reported to the police. Whenever a referral is made to children's social care and/or a report to the police, the school should inform children's social care and/or the police of the school's need to have a safety plan. Careful liaison with children's social care and/or the police should help the school to develop any such plan,

- consult children's social care and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures and statutory Family Help arrangements regarding the concern(s) or allegation(s) and need to have a safety plan, and seek their agreement to the plan whenever possible,
- consult the police, where they are involved, to seek advice, and agreement whenever possible, on the safety plan, and ensure that the safety plan does not prejudice any criminal investigation(s), and that it protects all children involved in any such investigation(s) to the greatest extent possible,
- If an agency is not, for whatever reason, engaging, then the school should advise the agency that it intends to develop a safety plan for the/each child concerned. The school should also consider escalating their referral if they believe children's social care and/or the police should be engaged. The school should share its safety plan with children's social care and the police where they are involved. The safety plan should be consistent with any risk assessments or plans made by children's social care, the police, or any other professionals working with the child,
- give consideration to consulting and involving the child and their parents about the development of their safety plan, in accordance with any advice given by children's social care and/or the police. Where a report has been made to the police, the school should consult the police, and agree what information can be disclosed to the/each child who is allegedly responsible for the behaviour and their parents. There may be other circumstances where there are legitimate obstacles presented to parental knowledge/engagement – for example, if there is a suggestion or concern that informing the parents will put the/any child at additional risk; in these cases the school should work closely with children's social care and/or the police to take advice on how best to proceed, and
- A safety planning meeting may be helpful to develop the safety plan. Where such a meeting is to be held, careful consideration will need to be given to whether the child presenting the alleged behaviour, and/or their parents should attend. Where a child or parent does not attend, their wishes and feelings should still be sought in relation to any proposed safety plan in advance of the meeting by a professional – in the case of the child, with a designated trusted professional with whom he/she has a positive relationship. A version of the plan which is appropriate for the child's age and level of understanding should be provided to the child and their parents. Efforts should also be made to ensure that they understand what is proposed and to seek their agreement to the arrangements.

These steps will help to ensure that the safety plan is appropriately tailored to the/each child's needs and will enable the school to work with others in an effort to meet these needs in the longer-term.

**A safety plan should:**

- be proportionate and not stigmatise the child/ children allegedly responsible for or affected by the behaviour,
- set out relevant background information – including an overview of the context, the specific concern(s) or allegation(s), any relevant detail about the relationships, and any power differentials between the child/children allegedly responsible for the behaviour, and any children affected by it, the frequency of the alleged behaviour and any changes in it over time. Details should also be shared of action taken regarding the alleged concern(s) or allegation(s), and any

advice provided by children's social care, and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, and/or the police, and/or any other professional(s) working with the child/children,

- set out any relevant information regarding the child/ children concerned. For example, any relevant medical information, any previous concerns about the child's/children's behaviour, needs or harm that the child/children may have been exposed to in the past. Information should be shared on their wishes and feelings regarding the proposed safety plan. Consideration may need to be given to having two or more separate but aligned safety plans for the child who is allegedly responsible for the behaviour, and the child or children affected by it,
- identify and assess the nature and level of risk that is posed and/or faced by the child/children in school such as that which may arise in relation to locations, activities, contact with particular students, or transport arrangements to and from school; and contexts outside the school, including at home, in relationships with friends, child groups, interactions in the neighbourhood and/or during online activity (including synthetic media generation platforms and interactive AI platforms),
- set out the steps and controls that can be put in place to reduce or manage any risk. Issues that may be addressed include:
    - how safety will be ensured in the classroom, out of the classroom, on transport, and during unstructured or co-curricular activities, including trips and residential stays away from school. This may involve separating the child/ children who present risk from other children who may be affected by the alleged child-on-child abuse,
    - how to ensure that the child/children reportedly affected by the alleged behaviour feel(s) supported, including by appointing a trusted member of staff (a 'critical friend') with whom they can speak if they have existing concerns or if there are any future developments which cause them concern,
    - how best to draw on any other trusting relationships where these exist, and create them where they do not, to provide the children concerned with support and a sense of belonging,
    - where relevant, how to manage the child's/ children's behaviour – this can be done in a number of ways including, for example, by way of a de-escalation plan for staff which identifies any triggers, explains how their behaviour can escalate, sets out the function of the behaviour for the child and proposes an appropriate action or response to it; identifying language that should be used and avoided; a positive handling plan; or implementing controls and measures to reduce or manage any risk,
    - whether restorative action would be appropriate and, if so, how best to take such action, bearing in mind the specific needs of the child/children concerned, and the appropriateness of any such action given the nature and seriousness of the concern(s) or allegation(s). Advice should be taken from children's social care, specialist sexual violence services, and the police where they are involved (if so, proposed restorative action could otherwise jeopardise a police investigation),
    - whether any targeted interventions are needed to address the underlying attitudes or behaviour of the child/children, any emotional and behavioural disorders, developmental disorders, or learning difficulties, and/or to meet the child's/ children's psychological,

emotional or physical needs; drawing on local statutory, private and/ or voluntary services as appropriate, and
    - whether the behaviour is of such high risk that suitable controls cannot be put in place within the school setting which would enable it to be adequately managed. In this case, consideration will need to be given to alternative plans for the child/children presenting the alleged behaviour. The principle that any child who is reported to have experienced child-on-child abuse should not have restrictions or controls placed on them as a result of another child's alleged behaviour should be given priority consideration.
- identify and consider how to build on strengths and positive aspects that the/each child possesses and/or is exposed to, such as those emanating from activities or lessons that the child enjoys and engages with; positive characteristics and skills that the child possesses; and/or trusting relationships with the child's family, other students or staff,
- assess any risks that are posed and/or faced by the wider school community (including all other students and, where appropriate, staff and parents) and identify any steps that the school can take to mitigate these risks. This may include:
    - consideration of how to support any students (and, where appropriate, staff and parents) who know about and/or may be affected by the alleged behaviour, and/or who may be required to participate in any investigation(s) – where these students have their own standalone safety plan, they should cross refer to and be consistent (where appropriate) with one another, and
    - consideration of work that can be undertaken with the wider staff or student population to help to protect children against child-on-child abuse in the future. Careful consideration will need to be given to managing confidentiality for children affected by the alleged behaviour or engaged themselves in any such behaviour.
- set out the steps needed to implement the safety plan, including how to communicate with and what information should be shared with relevant staff members – in the strictest confidence – so that they are able to implement the actions set out in the plan and safeguard the children concerned appropriately, and
- be reviewed at regular intervals, or if there is a change in perceived risks or circumstances. Reviews should be carried out in light of the children's ongoing needs to ensure that real progress is being made which benefits the children concerned.

If at any stage the risk increases, there is a further alleged incident, or any individual child's needs escalate, the DSL should contact children's social care, and/or local MASH (or equivalent), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, to determine the appropriate course of action. In the event that any new information is disclosed at any time indicating a child may have been harmed, is at risk of harm, or is in immediate danger, the school should again follow local safeguarding procedures in line with Keeping Children Safe in Education (KCSIE 2026), and statutory guidance on Working Together to Safeguard Children, and make a new referral to children's social care and, if appropriate, report to the police. Similarly any new information disclosed at any time regarding alleged rape, assault by penetration or sexual assault must always be shared with the police.