



Pepleton Brook Farm

Safeguarding and Child Protection Policy

Review Cycle: Annual

Current Review Date: August 2026

Effective Date: 1 September 2026

Next Review Date: Annually

Author: Jake Payne - Business & Operations Manager **Date:** 04/08/2026

Implementation status: *Updated against the July 2026 information version of KCSIE 2026 and the DfE statutory guidance on mobile phones. KCSIE 2025 remains in force until 31 August 2026. This policy is intended to apply from 1 September 2026 and must be checked against the final KCSIE 2026 publication when issued.*

Key Contacts

Role	Name	Contact Details
Designated Safeguarding Lead (incl. E-Safety)	Jo Garrad	jo@pepletonbrookfarm.co.uk
Deputy Designated Safeguarding Lead	Clarissa Saunders	clarissa@pepletonbrookfarm.co.uk
Local Authority Designated Officer (LADO)	South Gloucestershire LADO	lado@southglos.gov.uk
01454 868508		
External Procedures Reference	South West Child Protection Procedures	www.proceduresonline.com/swcpp

Legal Duties

This policy is aligned with:

- Children Act 1989 & 2004
- Education Act 2002
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2026) (effective 1 September 2026; KCSIE 2025 remains in force until 31 August 2026)
- DfE Mobile Phones in Schools statutory guidance (schools should follow from 1 September 2026)
- Equality Act 2010
- School Premises (England) Regulations 2012 and Education (Independent School Standards) Regulations 2014
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- Counter-Terrorism and Security Act 2015

All staff must be alert to risks, maintain the view that "it could happen here", and report concerns immediately. All staff, including those who do not work directly with children, must read Part one of KCSIE 2026 in full and receive a copy at induction.

Rationale

We are committed to:

- Ensuring all students feel safe, valued, and empowered to report concerns
- Upholding the absolute right of all children to safety
- Working actively with families and external agencies

Our approach includes:

- Prevention through ethos, pastoral support, and education
- Clear reporting structures and procedures
- Support for affected students and families
- Robust recruitment, training, and supervision of staff

Policy Implementation

Peopleton Brook Farm will:

- Train and appoint a DSL and Deputy DSL
- Ensure all staff know how to contact safeguarding leads

- Provide safeguarding induction, Part one of KCSIE 2026, and regular safeguarding updates and refresher training
- Maintain confidentiality and responsible information sharing
- Promote a listening and inclusive culture
- Maintain robust DSL and deputy cover arrangements, including a confidential shared route for urgent safeguarding contact
- Share safeguarding information proactively, lawfully and as early as possible, using a recorded risk assessment where appropriate

DSL Responsibilities (Summarised)

- Manage and refer concerns
- Liaise with external agencies
- Monitor vulnerable groups
- Maintain accurate and secure safeguarding records
- Lead policy reviews and staff training
- Understand local assessment protocols and coordinate universal services, community-based early help, Family Help and statutory referrals
- Ensure safeguarding cover, information-sharing decisions and the rationale for referrals or non-referrals are recorded securely

Key Safeguarding Focus Areas (aligned with KCSIE 2026)

1. Online Safety, Generative AI and Digital Harms

- Recognise content, contact, conduct and commerce risks, including harmful or illegal content, misinformation, grooming, radicalisation, cyberbullying, image-based abuse, and AI-generated nudes or semi-nudes
- Use social media, devices and generative AI safely and effectively. Personal or safeguarding data must not be entered into unapproved AI services. Filtering and monitoring must be reviewed at least annually by the responsible SLT member with DSL and IT support, tested across all internet-connected devices and relevant locations, and recorded.

2. Mobile Phones and Smart Devices

- Peopleton Brook Farm is a mobile phone-free environment by default. Children must not have access to mobile phones, smart watches or similar communication/recording devices during lessons, transitions, breaks or lunchtime.
- A child may bring a device only with prior agreement for travel, disability, medical, safeguarding or other exceptional need. It must be switched off and handed in or stored securely on arrival, and may be accessed only for the agreed purpose, time and place.
- Parents and carers must contact children through the school office during the school day. Any search, confiscation or sanction must follow the behaviour policy, be lawful and proportionate, and take account of age, SEND and individual circumstances.

- Staff personal phones and smart devices must be switched off or silent and stored securely away from pupil-facing areas. Staff must not use personal devices for personal reasons in front of children or while supervising them.
- Staff must never photograph, film, record or store information about a child on a personal device. An exception for an emergency, disability, medical need, multi-factor authentication or a specific work task requires prior authorisation where practicable and must use an approved device or process.
- Any breach by an adult is a conduct and potential safeguarding matter and must be reported under the low-level concerns or allegations procedure.

3. Child-on-Child Abuse (including Harassment and Violence)

- Child-on-child abuse is never tolerated or dismissed as banter. It is preventable and is a safeguarding issue for both the victim and alleged perpetrator; it may include serious physical harm or threats involving weapons.
- It includes bullying, racism, misogyny, misandry, upskirting, harmful sexual behaviour, sexual harassment or violence, and making or sharing nudes or semi-nudes, including AI-generated images. Every nude/semi-nude incident requires a safeguarding response, whether described as consensual or non-consensual.

4. Mental Health

- Mental health difficulties may be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation. Staff observe and report; they do not diagnose.
- Concerns must be raised promptly with the DSL. Support may involve school-based help, external mental health services, Family Help or children's social care.

5. Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) and Modern Slavery

- Includes County Lines, grooming, coercion, trafficking and exploitation by an individual, organised network or gang; conduct may constitute modern slavery.
- Children may identify with the group exploiting them and may be criminalised for actions taken under coercion. Staff must treat them as children in need of protection and report indicators promptly.

6. Children Absent from Education and Children Missing Education (CME)

- Attendance patterns are monitored closely, with particular attention to repeated or prolonged absence and unexplained changes
- Absences followed up immediately
- Persistent or safeguarding-related absence is addressed under local protocols, with referral to the local authority, Family Help or children's social care as appropriate and liaison with the Virtual School Head where relevant

7. Contextual Safeguarding and Early Help

- The DSL considers the wider context of harm at home, online and in the community, and the child's need for universal services, community-based early help, targeted Family Help or statutory protection

- Context, the child's voice, risk assessments, information-sharing decisions, referrals and reasons for action or non-action are recorded clearly

8. Low-Level Concerns and Whistleblowing

- Staff are encouraged to raise *any* concern
- A clear process documents, escalates and reviews concerns about staff, supply staff, trainee teachers, volunteers and contractors. Harm-threshold concerns go to the headteacher/principal; concerns that do not meet the threshold follow the low-level concerns policy.

9. Single-Sex Facilities and Support for Gender-Questioning Children

- Children who are questioning their gender must be supported sensitively and on a case-by-case basis, with safeguarding and the child's best interests central. Parents or carers should be involved wherever possible and relevant clinical advice considered where available. Staff must not make unilateral changes relating to social transition.
- The school must not allow a child to use toilets designated for the opposite biological sex, including when responding to a request to support any degree of social transition.
- Separate toilets must be provided for boys and girls aged 8 and over, except for a self-contained toilet in a room intended for one pupil at a time and lockable from the inside.
- Any mixed-sex toilets provided in addition to single-sex facilities must be individually lockable, open directly onto a public area where practicable, and be subject to a documented safeguarding risk assessment.
- If a gender-questioning child does not wish to use the toilet designated for their biological sex, the school should consider a suitable self-contained alternative without compromising single-sex provision or the safety, comfort, privacy or dignity of any child.
- Alternative arrangements must be recorded clearly, communicated only to those who need to know, and reviewed regularly.
- Children aged 11 or over must not undress in front of children of the opposite biological sex and must not use changing rooms designated for the opposite sex. Where single-sex sport is required for safety, there are no exceptions; other requests require a balanced, recorded consideration.

10. Information Sharing and Wider KCSIE 2026 Requirements

- Safeguarding information must be shared proactively and as early as possible with those who need it. Data protection is not a barrier to necessary sharing; decisions must be lawful, proportionate, secure and recorded.
- The additional barriers and support needs of young carers, children with SEND, children with medical conditions, looked-after and previously looked-after children, and children in alternative provision must be considered in risk assessment and planning.
- Alternative provision placements require safeguarding due diligence, clear information sharing and continuing oversight of attendance, welfare and outcomes; placement does not transfer the school's safeguarding responsibility.

Types of Abuse (as defined by statutory guidance)

- **Physical Abuse:** Causing physical harm to a child, including hitting, shaking, poisoning, or misuse of medication.
- **Emotional Abuse:** Persistent emotional maltreatment, including verbal abuse such as criticism, belittling or name-calling, threats, or denying a child the opportunity to express their views.
- **Sexual Abuse:** Forcing or enticing a child to take part in sexual activities, with or without physical contact. This includes grooming, online exploitation, and the making or sharing of nudes or semi-nudes, including AI-generated images.
- **Neglect:** Failure to meet a child's basic physical and/or psychological needs, such as not providing adequate food, shelter, clothing, or supervision.
- **Child Criminal Exploitation (CCE):** Manipulation or coercion into criminal activity, including County Lines. It may be committed by an individual, organised network or gang, may constitute modern slavery, and victims may be criminalised for conduct under coercion.
- **Child Sexual Exploitation (CSE):** Sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. Most sexual abuse is committed by people known to the victim.
- **Domestic Abuse:** Children may experience the effects of physical, sexual or emotional abuse, stalking, coercive or controlling behaviour and financial exploitation in the home, whether or not they directly witness incidents.
- **Child-to-Parent or Caregiver Abuse:** Abuse by a child towards a parent or caregiver may itself indicate unmet need, trauma or risk and requires a safeguarding response for everyone affected.
- **Modern Slavery:** Includes trafficking, slavery, servitude and forced or compulsory labour. Suspected cases must be referred through safeguarding and National Referral Mechanism procedures as appropriate.
- **Online Abuse:** Abuse facilitated by technology, including grooming, exploitation, cyberbullying, harmful content, and manipulated or wholly AI-generated sexual images.
- **Radicalisation:** Encouraging children to adopt extremist views or participate in terrorism-related activities.

Clear Guidance for Staff: What To Do and Not To Do If Abuse Is Identified or Reported

To strengthen good practice and transparency, this policy now includes explicit, practical guidance for all staff.

If a child makes a disclosure (tells you something concerning):

DO:

- Stay calm and listen carefully
- Use **TED questions** (Tell me... Explain... Describe...)

- Reassure the child they have done the right thing
- Record the disclosure immediately and factually
- Report to the DSL **without delay**

DO NOT:

- Ask leading questions ("Did they do X to you?")
- Promise confidentiality
- Express shock or disbelief
- Investigate yourself or confront the alleged abuser

If you suspect abuse (but the child has not disclosed):

DO:

- Record what you have seen/heard
- Report to DSL

DO NOT:

- Ignore "low level" concerns
- Assume someone else is dealing with it

If a safeguarding concern or allegation is made about a member of staff, supply staff, trainee teacher, volunteer or contractor:

DO:

- Report immediately to the Operations Supervisor/headteacher/DSL. One of these three report back to whistle blowing policy where the head is the sole proprietor or there is a conflict of interest, report directly to the LADO
- The head/case manager must consider without delay whether referral to the LADO is required; the DSL remains responsible for the child's welfare and any referral to children's social care

DO NOT:

- Share information widely
- Approach the staff member involved

If a child is in immediate danger:

- Call 999

- Then notify DSL

This guidance ensures all staff clearly understand expectations and processes.

Sample Reporting Flowchart

1. Concern Identified by staff, volunteer, or student
2. Immediate report to DSL (or Deputy DSL if DSL unavailable)
3. DSL assesses risk and logs concern via CPOMS/LearnTek
4. If threshold is met, refer to Children's Social Care; for an adult-conduct concern, report to the head/case manager to consider LADO referral
5. DSL monitors and follows up — family and student supported throughout
6. Records retained securely and actions documented

Staff Training and Responsibilities

- Annual safeguarding training and regular updates; all staff read Part one of KCSIE 2026 in full
- Code of Conduct and Safe Working Practice agreements
- Professional boundaries, personal mobile phones, approved recording devices, online conduct and safe use of generative AI are addressed at induction and in the staff code of conduct

Safer Recruitment

- Enhanced DBS checks and barred-list checks are obtained where the role and law require them, before regulated activity begins
- Identity, qualification, and employment checks completed before start
- From 1 September 2026, the supervision exemption is removed: a volunteer teaching, training, instructing or supervising children on more than 3 days in any 30-day period, or overnight, is in regulated activity and requires the applicable checks
- The school makes DBS and Teaching Regulation Agency referrals whenever the statutory criteria are met, including where a person leaves before action is completed

Site Security

- Controlled access to site and visitor management
- Supervised student arrivals and dismissals
- All visitors logged and supervised as appropriate

Supporting Vulnerable Students

Focus groups include:

- SEND students
- Looked After and previously Looked After Children
- Young carers
- Students with EAL
- Victims of abuse, exploitation, or mental health challenges
- Children with medical conditions
- Children who are absent from education or placed in alternative provision
- Children who are lesbian, gay, bisexual or questioning their gender

Pastoral support, the child's voice, collaborative and secure record keeping, reasonable adjustments, and tailored interventions are part of our safeguarding approach. Additional barriers to disclosure, attendance and access to support are actively considered.

Responding to Disclosures

- Use TED questioning (Tell me, Explain, Describe)
- Avoid leading questions or making promises
- Report to DSL and record all details clearly on CPOMS

Safeguarding Concerns or Allegations Against Staff and Other Adults

- Report any harm-threshold concern or allegation about staff, supply staff, trainee teachers, volunteers or contractors immediately to the headteacher/principal; low-level concerns follow the low-level concerns policy
- If the concern is about the headteacher/principal, report it to the chair/proprietor. If the head is also the sole proprietor, or there is a conflict of interest, report directly to the LADO
- The head/case manager considers referral to the South Gloucestershire LADO without delay (01454 868508). The DSL protects the child and makes any required referral to children's social care. The school and any relevant agency, employer or training provider share safeguarding responsibilities.

Whistleblowing and Escalation of Safeguarding Concerns

Peopleton Brook Farm is committed to maintaining an open, transparent and safe culture where all staff, volunteers and visitors feel able to raise concerns about poor practice, unsafe conduct or safeguarding failures.

All adults working at or with Peopleton Brook Farm have a responsibility to report concerns where they believe a child may be at risk, where safeguarding procedures are not being followed, or where the conduct of an adult may place a child at risk.

Concerns may include, but are not limited to:

- A failure to report or act on safeguarding concerns
- Unsafe working practices
- Inappropriate behaviour towards a child
- Breaches of professional boundaries
- Concerns about the conduct of a member of staff, volunteer, visitor or contractor
- Attempts to discourage, minimise or ignore safeguarding concerns
- Poor record keeping or failure to follow CPOMS/reporting procedures

Concerns about a child should be raised with the DSL. Concerns or allegations about an adult's conduct should be raised with the headteacher/principal; concerns about the head should be raised with the chair/proprietor. If the head is the sole proprietor, there is a conflict of interest, or the concern has not been dealt with appropriately, staff should contact the LADO or another appropriate external agency directly.

Where an allegation or concern about staff, supply staff, a trainee teacher, volunteer or contractor indicates possible harm or risk of harm, the head/case manager must consider without delay whether referral to the LADO is required. Direct referral to the LADO is required where the concern is about a head who is also the sole proprietor or where reporting internally creates a conflict of interest.

No member of staff will suffer detriment, criticism or disciplinary action for raising a genuine safeguarding concern in good faith, even if the concern is later found to be mistaken. Peopleton Brook Farm expects all staff to act professionally and in the best interests of children at all times.

If a member of staff believes that a safeguarding concern has not been responded to appropriately, they have a duty to escalate the matter. This may include contacting Children's Social Care, the LADO, the NSPCC Whistleblowing Advice Line, or other appropriate external agencies.

Whistleblowing concerns must be recorded securely, treated sensitively, and reviewed by senior leadership to ensure appropriate action has been taken.

Glossary of Safeguarding Terms

- **DSL:** Designated Safeguarding Lead
- **LADO:** Local Authority Designated Officer
- **KCSIE:** Keeping Children Safe in Education
- **CPOMS:** Child Protection Online Management System
- **CCE:** Child Criminal Exploitation
- **CSE:** Child Sexual Exploitation
- **CME:** Children Missing Education
- **SEND:** Special Educational Needs and Disabilities
- **RSHE:** Relationships, Sex and Health Education
- **HSB:** Harmful Sexual Behaviour
- **Family Help:** Targeted multi-agency help for children and families
- **VSH:** Virtual School Head
- **PSED:** Public Sector Equality Duty
- **Radicalisation:** The process by which individuals are drawn into extremist ideologies
- **Whistleblowing:** Reporting wrongdoing within an organisation, including safeguarding failures

Policy Review

This policy is reviewed annually and whenever national guidance, legislation, local procedures or the school's circumstances change. The July 2026 information version must be checked against the final KCSIE 2026 publication on or after 1 September 2026, with any further amendments approved and communicated promptly.

For detailed guidance on specific risks (e.g. FGM, Forced Marriage, Domestic Abuse, Honour-Based Abuse, Private Fostering, Radicalisation), refer to:

- South West Child Protection Procedures
- GOV.UK safeguarding resources
- KCSIE 2026 statutory guidance (effective 1 September 2026)
- DfE Mobile Phones in Schools statutory guidance (schools should follow from 1 September 2026)