

SAFEGUARDING POLICY

Chestnut Hill School



Designated Safeguarding Person (DSP): Jon White

Deputy Designated Safeguarding Persons (DDSPs):

Vickie Salamone and Kerry Hill

Safeguarding Governor: Melanie Callaghan-Lewis

Safeguarding Policy

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Welsh legal basis: This local policy has been adapted for Chestnut Hill School in Wales and is read alongside current Welsh Government guidance and the Wales Safeguarding Procedures.

Safeguarding is everyone's responsibility

All team members who work directly or indirectly with learners at Chestnut Hill School have a responsibility to safeguard their well-being. The following people have specific additional responsibilities and work together to ensure a consistent whole-school approach:

Designated Safeguarding Person (DSP)	Jon White
Deputy Designated Safeguarding Persons (DDSPs)	Vickie Salamone and Kerry Hill
Executive Head	Ben Reading
Head of School	Vickie Salamone
Safeguarding Governor	Melanie Callaghan-Lewis

Terminology

- “Team member” includes employees, agency and supply staff, contractors, consultants, trainees, volunteers and any other person working for or on behalf of the school in a paid or unpaid capacity.
- “Learner” means any child or young person educated or supported by the school. Where a learner is under 18, the child safeguarding framework applies. Where the school supports an adult aged 18 or over, adult safeguarding duties and the Wales Safeguarding Procedures for adults at risk apply where relevant.
- This policy uses the Welsh safeguarding terms Designated Safeguarding Person (DSP) and Deputy Designated Safeguarding Person (DDSP).
- Additional Learning Needs (ALN) and Individual Development Plan (IDP) are the Welsh terms used throughout this policy. Chestnut Hill School also educates learners placed by English local authorities. Where an English local authority maintains an Education, Health and Care Plan (EHC plan, commonly referred to as an EHCP), that plan will continue to be recognised as the learner’s statutory education plan and will inform provision, safeguarding, risk assessment and support arrangements at school. References in this policy to an IDP or other statutory plan therefore include an EHC plan where applicable. SEN/SEND terminology may also be used where it relates specifically to an English learner, an English placing authority or English statutory documentation. This does not alter the fact that safeguarding practice at Chestnut Hill School is governed by the Welsh safeguarding framework.

1.0 Policy statement

Chestnut Hill School is committed to safeguarding and promoting the well-being of every learner. Safeguarding and child protection are a core responsibility of the proprietor, governors, leaders and every team member. The school maintains a child-centred, rights-based culture in which learners are listened to, concerns are acted upon promptly, and decisions are made in the learner’s best interests.

This policy applies to all school activity, whether on site, off site, on transport, on visits or work experience, during remote or digital learning, and in any communication or activity carried out on behalf of the school. It should be read with the school’s related safeguarding, behaviour, attendance, online safety, restrictive practices, safer recruitment, whistleblowing and allegations procedures.

For Chestnut Hill School, the principal statutory safeguarding guidance is Keeping learners safe (Welsh Government, Guidance 283/2022), read with the Social Services and Well-being (Wales) Act 2014 statutory guidance, the Wales Safeguarding Procedures and the Independent School Standards (Wales) Regulations 2024.

1.1 Key Welsh legislation and guidance

The school will have regard to, and act consistently with, current legislation and guidance applicable in Wales, including:

- Education Act 2002, particularly section 157 as it applies to proprietors of independent schools, together with the Independent School Standards (Wales) Regulations 2024.
- Keeping learners safe: the role of local authorities, governing bodies and proprietors of independent schools under the Education Act 2002 (Welsh Government, Guidance 283/2022).
- Social Services and Well-being (Wales) Act 2014, particularly Part 7 safeguarding provisions, together with Working Together to Safeguard People statutory guidance (including Volume 5 for children at risk and Volume 6 for adults at risk where relevant).
- Wales Safeguarding Procedures, including the Section 5 procedures for safeguarding allegations/concerns about practitioners and persons in positions of trust, updated June 2026, and relevant All Wales Practice Guides.
- Children Act 1989, including sections 17 and 47 and the significant harm framework, and Children Act 2004.
- Additional Learning Needs and Education Tribunal (Wales) Act 2018 and Additional Learning Needs Code for Wales 2021, where applicable.
- Equality Act 2010; Human Rights Act 1998; Rights of Children and Young Persons (Wales) Measure 2011; and the United Nations Convention on the Rights of the Child (UNCRC).

- Children (Abolition of Defence of Reasonable Punishment) (Wales) Act 2020.
- Counter-Terrorism and Security Act 2015 and Prevent duty guidance: England and Wales (2023).
- Female Genital Mutilation Act 2003, as amended; Serious Crime Act 2015; Forced Marriage (Civil Protection) Act 2007; and legislation setting the minimum legal age of marriage at 18 in England and Wales.
- Domestic Abuse Act 2021; Sexual Offences Act 2003; Modern Slavery Act 2015.
- UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.
- Education (Pupil Registration) (Wales) Regulations 2010, current Welsh Government attendance guidance and the statutory guidance on children missing education.
- Education (Wales) Act 2014, the Education Workforce Council registration requirements applying to independent-school teachers and learning support workers, and applicable EWC fitness-to-practise referral requirements.
- Welsh Government guidance on reducing restrictive practices, web filtering and online safeguarding, supporting learners with healthcare needs, and the whole-school approach to emotional and mental well-being.

1.2 Core safeguarding principles

- The welfare and safety of the learner are paramount.
- Safeguarding is everyone's responsibility and concerns must never be left for somebody else to deal with.
- The school maintains an attitude of "it could happen here", including in relation to abuse within families, child-on-child abuse, exploitation, online harm and harm outside the home.
- The voice, communication needs, wishes and feelings of the learner will be sought and considered, without allowing this to delay necessary protective action.
- Concerns are recorded clearly, factually and contemporaneously and are shared with the right agencies at the right time.
- ALN, or SEN/SEND where an English statutory framework applies, together with disability, communication needs, medical conditions, trauma and other vulnerabilities, are considered so that signs of harm are not masked or misattributed.
- There is zero tolerance of abuse, harassment, violence, discriminatory harm, harmful sexual behaviour and bullying. Incidents are not dismissed as banter or normalised behaviour.

2.0 Local arrangements for the school

Chestnut Hill School is located in Flintshire and works within the regional safeguarding arrangements for North Wales. The school follows the Wales Safeguarding Procedures and relevant North Wales Safeguarding Board procedures. Where a learner is placed by another local authority, the school will also liaise with that placing authority and follow cross-border arrangements as required.

2.1 School safeguarding contacts

Role	Contact
Designated Safeguarding Person (DSP)	Jon White
Deputy DSPs (DDSPs)	Vickie Salamone; Kerry Hill
Executive Head	Ben Reading
Head of School	Vickie Salamone
Safeguarding Governor	Melanie Callaghan-Lewis
Group Safeguarding	safeguarding@ofgl.co.uk

2.2 Flintshire and regional contacts

- Flintshire Children's Social Services / Duty and Assessment Team: 01352 701000.
- Out-of-hours Duty Social Worker: 0345 053 3116.
- Child protection referral email (office hours): ChildProtectionReferral@flintshire.gov.uk.
- Flintshire Adult Social Services / Single Point of Access (for adults at risk): 01352 702000; SSDUTY@flintshire.gov.uk.
- Early intervention / family support: phone 01352 701000 and ask for the Information, Advice and Assistance (IAA) Team; email earlyhelpclub.referral@flintshire.gov.uk.
- North Wales Safeguarding Board: www.northwalessafeguardingboard.wales.
- Wales Safeguarding Procedures: www.safeguarding.wales.
- Police: 999 where there is immediate danger or an emergency; 101 for non-emergency police contact.

2.3 LADO / Designated Officer for Safeguarding (DoS)

Under the Wales Safeguarding Procedures, every local authority has a Local Authority Designated Officer (LADO), with functions that may be delegated to a Designated Officer for Safeguarding (DoS), to manage and monitor allegations and safeguarding concerns about practitioners and persons in positions of trust. For Flintshire, advice or referral should be sought through the current Social Services safeguarding route on 01352 701000 unless a direct LADO/DoS contact has been issued to the school. Section 24 and Section 26 of this policy set out the school process.

2.4 Local reporting expectations

Where there is reasonable cause to believe a child may be at risk of abuse, neglect or other harm, the concern will be reported to local authority social services in line with the Wales Safeguarding Procedures. For independent schools in Wales, Welsh Government operational guidance states that a report that a child may be at risk should be made to social services within 24 hours of the concern being identified; where a report is made verbally or by telephone it should be confirmed in writing within 24 hours. Immediate danger or suspected serious criminal offending must be acted on without delay.

2.5 Contextual safeguarding profile and escalation

At least annually, the DSP will review the school's safeguarding context, taking account of North Wales and placing-authority priorities, school safeguarding data, attendance, child-on-child incidents, online harms, exploitation, domestic abuse, serious violence, missing episodes, transport and community risks, and the needs of learners with ALN. The review will inform training, curriculum, supervision, risk assessment and resource decisions.

Where the school disagrees with a threshold, risk or service decision, the DSP or Head of School will use the relevant professional challenge/escalation procedure. Safeguarding action will not be delayed while disagreements are resolved.

3.0 What is safeguarding and child protection?

3.1 Safeguarding

Safeguarding is preventing and protecting children from abuse, neglect or other kinds of harm, promoting their well-being, and ensuring that adults around them can recognise risk and act. It includes preventing impairment of health or development, supporting safe and effective care, and taking action so that children can achieve the best outcomes. Safeguarding applies online and offline and to harm inside and outside the home and school.

3.2 A child at risk and the duty to report

For the purposes of the Social Services and Well-being (Wales) Act 2014, a child at risk is a child who is experiencing or is at risk of abuse, neglect or other kinds of harm and who has needs for care and support, whether or not the local authority is meeting any of those needs. Team members must follow the school reporting process and Wales Safeguarding Procedures. Any team member may contact social services or the police directly where necessary, particularly where immediate action is required.

3.3 Child protection and significant harm

Child protection is the part of safeguarding concerned with action to protect a particular child who is suffering, or is likely to suffer, significant harm. The Children Act 1989 significant-harm framework and section 47 enquiries remain relevant in Wales. The school does not investigate suspected child abuse; it records and reports concerns and cooperates fully with statutory enquiries.

3.4 Categories and forms of abuse

- Physical abuse - deliberately causing physical injury or harm, including fabricated or induced illness.
- Emotional abuse - persistent emotional maltreatment that adversely affects a child's emotional development, including humiliation, threats, rejection, serious bullying, coercive control and exposure to domestic abuse.
- Sexual abuse - forcing, enticing, causing or inciting a child to take part in sexual activities, including contact and non-contact abuse, grooming, online abuse and the creation, possession or sharing of sexual images.
- Neglect - persistent failure to meet a child's basic physical and/or psychological needs, including adequate food, clothing, shelter, supervision, medical care, education, protection or emotional support.
- Exploitation and other harm - including child sexual exploitation, child criminal exploitation, trafficking, modern slavery, financial/economic exploitation, county lines, radicalisation, harmful sexual behaviour, honour-based abuse and online-facilitated abuse.

Abuse may be committed by adults or by other children; may occur in a family, institutional or community context; may take place online, offline or both; and may involve known or unknown persons. Children can be harmed by seeing, hearing or experiencing the effects of domestic abuse.

3.5 Contextual safeguarding and extra-familial harm

The school takes a contextual safeguarding approach. Risk outside the family - for example in peer groups, transport, neighbourhoods, online spaces, gangs, relationships or community settings - will be considered alongside family circumstances. A learner who displays harmful behaviour may also be vulnerable or have experienced harm and will be assessed and supported accordingly.

4.0 The role of governors, the proprietor and senior managers

The proprietor has legal responsibility for ensuring Chestnut Hill School meets the Independent School Standards (Wales) Regulations 2024, including making and effectively implementing arrangements and a written policy to safeguard and promote pupils' welfare, having regard to Welsh Ministers' guidance. Governors and senior leaders provide oversight, challenge and assurance.

- Appoint an appropriately senior DSP and sufficient DDSP cover, with the authority, time, training and resources to carry out the role.
- Identify a Safeguarding Governor and ensure the governing/proprietor body reviews safeguarding arrangements and this policy at least annually.
- Ensure all staff, including supply staff and volunteers, receive appropriate safeguarding induction and training, with written training records maintained.
- Ensure safe recruitment, vetting, EWC registration where required, three-yearly DBS renewal where required by the Independent School Standards (Wales) Regulations 2024, and a compliant Single Central Record.
- Ensure robust procedures for allegations/concerns about practitioners in accordance with Wales Safeguarding Procedures Section 5 and for low-level concerns that do not meet the Section 5 threshold.
- Ensure learners have accessible ways to report concerns and that learner voice and lived experience inform safeguarding practice.
- Ensure appropriate online filtering and safeguarding systems, clear monitoring roles, regular testing and at least annual review in line with Welsh digital standards and school risk assessment.
- Ensure premises use, contractors, visitors, external providers, alternative provision and work experience are covered by proportionate safeguarding arrangements.
- Monitor themes in safeguarding, attendance, behaviour, bullying, restrictive practice, online safety and child-on-child abuse and act on emerging patterns.
- Ensure the school has due regard to equality, human rights and children's rights and removes barriers to reporting for learners with ALN, or SEN/SEND where applicable, disability or communication needs.

The Safeguarding Governor will meet with the DSP at appropriate intervals, provide strategic challenge, monitor policy implementation and training, and report to the governing/proprietor body. Safeguarding oversight must not compromise the confidentiality of individual cases.

5.0 Designated Safeguarding Person (DSP)

5.1 Appointment, status and cover

The DSP must be a senior member of the school leadership team with sufficient status and authority to commit resources and direct safeguarding action. In accordance with Keeping learners safe, the school will have at least one deputy with equal status and access to appropriate safeguarding training. Chestnut Hill School has two DDSPs. The DSP or a DDSP must be available during school hours, with clear cover arrangements when the DSP is absent.

5.2 Core responsibilities

- Act as the school's principal point of contact for safeguarding advice and support and make or coordinate reports to social services, police, Prevent and other agencies as appropriate.
- Ensure immediate protective action is taken where a learner may be at risk and that organisational notifications never delay statutory safeguarding action.
- Maintain a thorough working knowledge of Keeping learners safe, the Wales Safeguarding Procedures, relevant All Wales Practice Guides, North Wales procedures and current local contacts.
- Keep the Head of School/Executive Head appropriately informed, particularly about significant concerns, section 47 enquiries, police investigations, allegations against adults and emerging safeguarding patterns.
- Ensure high-quality records are created and securely maintained, recording the concern, decisions, rationale, action, outcomes and review.
- Ensure safeguarding files are kept separately from the general pupil record and information is shared securely when a learner moves setting.
- Liaise with placing authorities, social workers, health, police, youth justice, relevant education contacts and other professionals and participate in child protection conferences, core groups and multi-agency meetings.
- Lead safeguarding training, updates and induction arrangements, keep a record of training, and ensure team members know how to report concerns and escalate if they are not acted upon.
- Lead safeguarding aspects of online filtering/monitoring, including review of alerts and patterns, and work with IT/technology providers on safe systems.
- Review safeguarding data, contextual risk and curriculum implications and ensure preventative education responds to identified themes.
- Liaise with the Safeguarding Governor and contribute to the annual safeguarding audit and policy review.
- Ensure that allegations/concerns about practitioners are managed under the Wales Safeguarding Procedures Section 5 and in liaison with the LADO/DoS, HR and Group Safeguarding where appropriate.

The DSP's role is not to investigate suspected abuse. The DSP assesses the information available, ensures the learner is safe, makes or coordinates the required report/referral and supports statutory agencies with their enquiries.

5.3 Records and transfer

Safeguarding records must be clear, factual, dated, timed and attributable. They should record what was observed or disclosed, the learner's own words where relevant, decisions and rationale, people consulted, actions, outcomes and any follow-up. Records are confidential but data protection law must not be used as a barrier to necessary safeguarding information sharing.

When a learner transfers, the DSP will ensure the child protection file and relevant safeguarding information are transferred securely and separately from the general school file as soon as practicable. Chestnut Hill School will aim to transfer information within five school days for an in-year transfer or within the first five school days of a new term, unless local arrangements require sooner. Receipt should be confirmed. The receiving setting should be alerted to urgent risk before transfer where necessary.

6.0 Safeguarding training and updates for all team members

Safeguarding training is integrated into the whole-school safeguarding approach. It is not a one-off event. Training content will reflect the school's learner profile, local context, current Wales Safeguarding Procedures, Welsh Government guidance and emerging risks.

6.1 Minimum school expectations

- All new team members receive safeguarding and child protection induction, including the identity and role of the DSP/DDSPs, reporting routes, whistleblowing, staff conduct, online safety and local authority contacts.
- All team members complete the Group's mandatory safeguarding training and any role-specific training required by the school.
- All team members receive regular safeguarding updates through briefings, meetings, supervision, written updates or training so that knowledge remains current.
- Keeping learners safe advises staff to undertake refresher safeguarding training preferably within two years and not to exceed three years between refresher training. Chestnut Hill School may set a shorter cycle through Group requirements.
- The DSP and DDSPs receive prompt inter-agency/procedural training, including Wales Safeguarding Procedures, and maintain advanced knowledge through refresher training. Chestnut Hill School requires advanced DSP/DDSP refresher training at least every two years, together with interim updates.
- Governors, including the Safeguarding Governor, receive safeguarding training sufficient to provide effective oversight and challenge.

6.2 Training themes

Training and updates will include, proportionate to role: recognising abuse and neglect; professional curiosity; responding to disclosures; ALN, and SEN/SEND where an English framework applies, including communication barriers; domestic abuse and Operation Encompass; child-on-child abuse and harmful sexual behaviour; CSE/CCE and county lines; modern slavery and trafficking; online safety, generative AI, synthetic/deepfake imagery, sextortion and self-generated intimate images; Prevent; FGM and forced marriage; attendance and missing education; mental health and self-harm; safer recruitment; allegations/Section 5; low-level concerns; information sharing; and the safe use of restrictive practices.

6.3 Required reading

All team members must know and follow this policy and the school/Group policies relevant to their role. The DSP will ensure staff have access to current Welsh safeguarding sources, in particular Keeping learners safe, the Wales Safeguarding Procedures and local North Wales/Flintshire arrangements. Where Group documents use different terminology or cross-border procedures, practice at Chestnut Hill School will follow the Welsh statutory framework and this local policy.

7.0 Roles and responsibilities of team members

Every team member is responsible for creating a safe environment, identifying welfare or safeguarding concerns, acting on them, and contributing to a culture in which learners can speak and be heard.

- Know the DSP and DDSPs, local reporting route and emergency procedures.
- Maintain an attitude of professional curiosity and report all safeguarding concerns promptly, even where the information appears incomplete or minor.
- Listen carefully to learners; take disclosures seriously; do not promise secrecy; do not investigate or ask leading questions; and record the learner's words accurately.
- Report concerns to the DSP/DDSP verbally without delay and make the required written/electronic record on the same working day.
- If a concern is not acted on, or the DSP/DDSP is unavailable and action is needed, escalate to the Head of School/Executive Head or contact social services/police directly.
- Understand that any staff member can make a direct report to local authority social services or police and must do so if this is necessary to protect a learner.
- Be alert to signs of abuse, neglect, exploitation, modern slavery, radicalisation, domestic abuse, child-on-child abuse and online harm.

- Consider the impact of ALN, or SEN/SEND where an English framework applies, disability, sensory needs, communication difficulties, trauma, medical conditions and behaviour on a learner's ability to communicate harm. Behaviour must not automatically be attributed to a diagnosis or need.
- Follow professional boundaries, the Code of Conduct, mobile/device rules and whistleblowing procedures and report concerns about adults working with learners.
- Contribute to multi-agency plans, risk assessments and protective arrangements when requested.

7.1 Signs and indicators

Possible indicators include unexplained injuries; significant changes in behaviour, attendance, presentation or personality; withdrawal or anxiety; aggression; fearfulness; sexualised behaviour or knowledge not expected for developmental level; repeated missing episodes; changes in peer group; unexplained money, gifts or possessions; deterioration in hygiene or health; hunger; fatigue; concerning online activity; or a learner appearing controlled, intimidated or exploited. No single sign proves abuse. Concerns arise from the pattern, context and professional judgement and must be shared with the DSP.

7.2 Learners with ALN or SEND, disability or health needs

Learners with ALN, and learners with SEN/SEND under an English statutory framework, may face additional safeguarding barriers, including communication difficulties, greater dependence on adults, intimate care, reduced recognition of abusive behaviour, peer isolation and the risk that signs of harm are mistaken for features of a condition. Team members must be especially alert to unexplained changes, injuries, distress, behaviour, attendance, care routines or medication. An IDP, Education, Health and Care Plan (EHC plan/EHCP), healthcare plan, communication passport or other support plan informs safeguarding practice but never replaces a safeguarding assessment.

7.3 Discrimination, identity and vulnerability

Being lesbian, gay, bisexual, transgender, queer, questioning, ace or otherwise exploring identity is not in itself a safeguarding risk. Learners may nevertheless experience bullying, prejudice, isolation, online harm or barriers to seeking help. The school will support every learner with dignity, privacy and respect and respond to safeguarding concerns in line with the Equality Act 2010, Human Rights Act 1998, children's rights and Welsh safeguarding guidance. Decisions about individual support or facilities will be considered case by case with safeguarding, privacy, equality and the learner's needs in mind.

7.4 Looked-after and previously looked-after children

Learners who are looked after or have previously been looked after may remain vulnerable. The DSP will know the relevant social worker and placing-authority contacts and will liaise with the appropriate looked-after-children education contact/LACE arrangements where applicable. Safeguarding information will be used to support the learner and not to stigmatise or disadvantage them.

7.5 Domestic abuse and Operation Encompass

Children can be victims of domestic abuse by seeing, hearing or experiencing its effects, as well as through abuse in their own intimate relationships. Operation Encompass notifications will be received and managed confidentially by the DSP or nominated Key Adult, recorded securely and used to provide timely support. An Operation Encompass notification does not replace a safeguarding report where the threshold for social services or police action is met.

8.0 Safer recruitment

The school follows the Group Safer Recruitment Policy and the requirements of the Independent School Standards (Wales) Regulations 2024. Recruitment is designed to deter and prevent unsuitable people from working with learners.

- Pre-employment checks will be completed before appointment as required, including identity, right to work, qualifications, references, enhanced DBS and barred-list information where the role is regulated activity, prohibition/management checks where applicable, and additional checks for people who have lived or worked overseas.
- For independent schools in Wales, relevant DBS checks must be renewed every three years in accordance with the Independent School Standards (Wales) Regulations 2024; DBS Update Service status checks will be used where applicable.
- Teachers and learning support workers in independent schools must be registered with the Education Workforce Council (EWC) where the statutory registration requirements apply. The school will verify and maintain required registration information.
- The school will maintain a Single Central Record covering staff, supply staff and others working in regular contact with children and record the checks required by Welsh independent-school standards.
- Safer recruitment includes appropriate scrutiny of employment history, references, online due-diligence searches where proportionate and lawful, interview questions about safeguarding, and assessment of suitability to work with children.
- Contractors, agency staff, volunteers and external providers will be subject to proportionate checks and written assurances appropriate to their role, frequency and contact with learners.

Copies of DBS certificates will only be retained where there is a lawful, documented reason and in accordance with data-protection requirements. The Head of School and Safeguarding Governor will obtain assurance through regular SCR/recruitment audits.

9.0 Early intervention, prevention and family support

Welsh safeguarding practice emphasises early identification, prevention and support. In Flintshire, early intervention and family support can be accessed through the Information, Advice and Assistance (IAA) Team / Early Help Hub, alongside school-based and other community services.

Team members should consider whether a learner or family may benefit from school-based support or community services where needs are emerging but statutory child-protection intervention is not indicated. Support may include pastoral work, health or mental-health services, youth services, family support, substance-misuse services, domestic-abuse services, exploitation support or other multi-agency help.

- Early support must not delay a report to social services where there is reasonable cause to suspect a child is at risk.
- The DSP will consider consent and parental involvement carefully. Parents/carers should usually be involved in support unless doing so could increase risk or undermine a safeguarding response.
- Where support is multi-agency, the school will share relevant information, contribute to assessment and planning, and review whether the learner's situation is improving.
- If risk escalates, needs are not being met or the child may be at risk, the DSP will make or escalate a report to social services.

10.0 Reporting concerns

Immediate danger: call 999. A safeguarding concern must never wait for completion of internal paperwork or for a particular manager to become available.

10.1 If a learner discloses

- Listen and remain calm. Allow the learner to speak in their own way and at their own pace.
- Take the learner seriously and reassure them that they have done the right thing by telling you.
- Do not promise confidentiality. Explain that information must be shared with people who can help keep them safe.
- Do not investigate, confront an alleged perpetrator, ask leading questions or press for unnecessary detail.
- Clarify only what is necessary to understand whether immediate action is required, using open prompts where needed.
- Record the disclosure as soon as possible using the learner's own words, noting date, time, context and any visible injury or behaviour.
- Report immediately to the DSP or a DDSP and complete the approved electronic safeguarding record on the same working day.

10.2 Decision and external report

The DSP will consider the information in the context of the Wales Safeguarding Procedures. If there is reasonable cause to suspect a child is at risk of abuse, neglect or other harm, a report will be made to local authority social services. Welsh Government guidance for independent schools requires such a report to be made within 24 hours of the concern being identified, and telephone or face-to-face reports should be confirmed in writing within 24 hours. Where immediate safety or a suspected serious criminal offence requires action, emergency services must be contacted without delay.

Chestnut Hill School will report to Flintshire as host authority and will also inform/liase with the learner's placing authority where required by the placement and cross-border safeguarding arrangements. Organisational reporting to Group Safeguarding, senior managers or governors must occur in parallel and must not delay the statutory report.

10.3 Escalation by team members

A team member who believes a concern has not been acted upon appropriately must follow up with the DSP and escalate to the Head of School/Executive Head, Group Safeguarding or the relevant local authority. Any team member can contact social services or police directly. If the concern relates to the Head of School/Executive Head or another senior person, Section 24 and the whistleblowing route apply.

11.0 Managing referrals to DBS and professional bodies

Safeguarding and employment processes may create separate referral duties. The Head of School/Executive Head, supported by HR, Group Safeguarding and the DSP, will ensure that required referrals are made at the correct time and that a settlement agreement, resignation or the end of an agency arrangement does not prevent a statutory referral.

- Disclosure and Barring Service (DBS): a referral will be made where the statutory conditions are met, including where the school has removed, or would have removed, a person from regulated activity because the person has harmed or poses a risk of harm to a child or vulnerable adult.
- Education Workforce Council (EWC): employers in Wales must refer a registered person where the statutory employer-referral criteria are met, including where services cease or would have ceased on grounds of misconduct, professional incompetence or conviction of a relevant offence. Where a case involves harm or risk of harm, DBS requirements must also be considered.

- Social Care Wales: where a registered social-care professional is involved, the school/employer will raise a fitness-to-practise concern when required, including serious safeguarding or police matters.
- Other regulators/professional bodies: where relevant, this may include HCPC or another statutory regulator. Referrals will be made in accordance with that regulator's current rules.

Education Workforce Council requirements apply to registered education practitioners in Wales, alongside any DBS, Social Care Wales, HCPC or other professional referral duties relevant to the individual and role.

12.0 Partnership working and sharing information

Effective safeguarding depends on timely, proportionate information sharing. The school will work with Flintshire, placing authorities, police, health, social care, the North Wales Safeguarding Board, regulators and other agencies as appropriate.

UK GDPR and the Data Protection Act 2018 do not prevent necessary information sharing for safeguarding. Team members must identify a lawful basis, share only information that is relevant and necessary, use secure methods, and record the rationale for decisions. Consent is not always required for safeguarding information sharing and must not be sought where doing so would increase risk, prejudice an investigation or create an unsafe delay.

- Share information with the right person, for a clear safeguarding purpose, at the right time.
- Be accurate, necessary, proportionate, relevant, adequate and secure.
- Distinguish fact, observation, professional opinion and information supplied by others.
- Record what was shared, with whom, why and any decision not to share.
- Seek advice from the DSP, Data Protection Officer or Legal Team where needed, but do not delay protective action.

The school will keep more than one emergency contact for each learner where reasonably possible and will keep contact information up to date. Data breaches will be reported immediately through the Group's data-breach process.

13.0 Child-on-child abuse (including harassment and violence)

Children can abuse other children. Child-on-child abuse can occur inside or outside school, online or offline, between learners of similar or different ages, and within intimate relationships. The school will not dismiss abusive or harmful behaviour as banter, friendship difficulties or part of growing up.

- bullying, cyberbullying and discriminatory/prejudice-based bullying
- physical abuse, assault, threats and violence
- abuse in intimate relationships between children and young people, including coercive control, stalking and financial/economic abuse
- harmful sexual behaviour, sexual harassment and sexual violence
- causing another person to engage in sexual activity without consent
- consensual or non-consensual creation or sharing of nude/semi-nude or self-generated intimate images, including AI-generated, altered or deepfake material
- upskirting, sexualised bullying, unwanted touching or sexual comments
- initiation/hazing-type behaviour, humiliation or coercive group behaviour
- misogyny, misandry, homophobia, biphobia, transphobia, racism, faith-based prejudice and other discriminatory harassment where it causes or contributes to harm.

13.1 Responding to a report

The response will be child-centred, calm and supportive. The learner reporting harm will be reassured, protected from retaliation and supported to communicate in an accessible way. The DSP will consider immediate safety, the needs and vulnerability of all learners involved, the context, age/development, coercion, power imbalance, online evidence, locations, transport, siblings and peer-group dynamics.

Where sexual violence or another potentially criminal offence is reported, the DSP will follow the Wales Safeguarding Procedures and seek advice/report to social services and police as appropriate. The school will not wait for the conclusion of a police or social-services process before implementing proportionate protective measures. Risk and needs assessments will be recorded and reviewed. The child alleged to have caused harm will also be treated as a child who may need assessment, support and safeguarding.

13.2 Intimate images and digital evidence

Team members must not intentionally view, copy, print, save or forward illegal sexual images of children. If an image is accidentally seen, staff should close it and report immediately to the DSP. The DSP will follow current UKCIS/Welsh online-safety guidance on preservation of evidence and agency involvement. AI-generated or manipulated sexual imagery of a learner will be treated as a serious safeguarding concern even where no original photograph was used.

14.0 Bullying

The school has a zero-tolerance approach to bullying and harassment, including cyberbullying, discriminatory bullying, prejudice-based incidents and bullying related to ALN, disability, race, religion or belief, sex, sexual orientation, gender reassignment or any perceived difference. Severe, repeated or discriminatory bullying may constitute a safeguarding concern and can cause significant harm.

All reports will be taken seriously, recorded, investigated at the appropriate level and responded to in a way that protects the learner harmed and addresses the behaviour. Patterns in location, transport, online spaces, peer groups or individual behaviour will be analysed and may lead to changes in supervision, curriculum, support or risk management. Where bullying indicates abuse, exploitation or significant harm, the safeguarding reporting process takes precedence.

15.0 Preventative strategies

Safeguarding is strengthened by a whole-school culture that develops learners' understanding, communication, resilience and ability to seek help. Preventative education must be accessible and adapted to developmental level, communication profile and ALN, or SEN/SEND where applicable.

- Teach learners about safe and respectful relationships, consent, personal boundaries, privacy, trusted adults, bullying, exploitation, online safety and how to report concerns.
- Use the school's RSE and health/well-being curriculum arrangements, having regard to the Curriculum for Wales Relationships and Sexuality Education (RSE) Code and Welsh Government guidance where applicable to the school's curriculum.
- Use visual supports, social stories, symbols, repetition, modelling and direct teaching where learners need this to access safeguarding concepts.
- Teach online resilience, including grooming, scams, harmful content, AI-generated content, deepfakes, image sharing, sextortion and how to get help.
- Reinforce safeguarding through assemblies, pastoral work, curriculum opportunities, behaviour expectations, learner voice and targeted interventions.
- Ensure teaching does not place responsibility for abuse on the learner; responsibility remains with the person causing harm.

16.0 Online safety and security

Online safety is integral to safeguarding. The school follows Welsh Government/Hwb "Keeping safe online" resources and the Education Digital Standards for web filtering and online safeguarding, alongside Group policies.

16.1 Filtering and monitoring

- Appropriate real-time filtering and online safeguarding controls will be used on school-managed networks and devices, balanced with legitimate teaching and learning access.
- Monitoring roles and escalation routes will be clearly assigned between senior leaders, the DSP and IT/technology support.
- Safeguarding alerts and reports will be reviewed promptly and patterns will be considered alongside other safeguarding information.
- Filtering and monitoring will be tested across relevant devices and locations and formally reviewed at least annually, and sooner following a significant risk, system change or new technology.
- Technical controls will be supplemented by effective staff supervision and learner education; filtering alone is not a safeguarding strategy.

16.2 Online risks

The school recognises risks across content, contact, conduct and commerce, including sexual and violent material; hate and extremist content; grooming and exploitation; harmful challenges; misinformation; cyberbullying; scams and phishing; gaming risks; self-generated intimate images; generative AI applications; synthetic/deepfake images or audio; impersonation; and the misuse of personal data.

16.3 Responding to online incidents

Any online incident that may indicate harm will be managed under the same safeguarding principles as an offline incident. Team members will report immediately to the DSP, preserve evidence safely without redistributing illegal material, and consider police/social-services reporting, device/account security, parental involvement, risk assessment, supervision and targeted education. Parents/carers will be supported with current online-safety information where appropriate.

17.0 Children and young people absent from or missing education

Absence can be a safeguarding indicator and may be associated with neglect, exploitation, domestic abuse, mental-health needs, bullying, criminality, transport difficulties or other harm. The school follows the Education (Pupil Registration) (Wales) Regulations 2010, current Welsh Government attendance-code guidance, the school Attendance Policy and Welsh statutory guidance on children missing education.

- Attendance is recorded accurately and monitored for patterns, including repeated part-day absence, unexplained absence and changes in presentation or engagement.
- Unexplained absence is followed up promptly using current emergency contact details and the school's first-day response arrangements.
- Where there is a safeguarding concern, the DSP is informed and the placing authority/local authority is contacted as required.

- Reasonable enquiries are made to establish a learner's whereabouts. Where a child cannot be located or there is reason to suspect significant harm, the matter is escalated without delay to social services and/or police.
- The school contributes to local-authority children-missing-education processes and provides information required by law or safeguarding arrangements.
- Learners known to social services or subject to care and support / protection arrangements will receive an enhanced safeguarding response to unexplained absence.

18.0 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

CSE and CCE are forms of child abuse in which a person or group takes advantage of an imbalance of power to coerce, manipulate, deceive or control a child into sexual or criminal activity. Exchange may involve something the child needs or wants, perceived status or belonging, financial gain to another person, violence, threats, debt or coercion. A child may not recognise that they are being exploited and may believe the relationship or group is genuine.

Indicators can include unexplained money or gifts; new or older associates; missing episodes; changes in transport or routine; multiple phones/accounts; unexplained injuries; substance use; sexual health concerns; fear, secrecy or threats; carrying drugs, weapons or cash; involvement in offending; or sudden changes in attendance or behaviour. Gender, disability and ALN, or SEN/SEND where applicable, may affect presentation and should not lead to stereotyped assumptions.

All concerns must be reported to the DSP on the same day. Where there is immediate risk or reasonable cause to suspect a child is at risk, the DSP will report to social services and police as appropriate and use the relevant Wales Safeguarding Procedures/All Wales Practice Guides. The learner will be treated as a potential victim of exploitation even where they have committed offences under coercion.

19.0 Serious violence

Team members must be alert to indicators of serious violence, including repeated absence, escalating peer conflict, association with older or risky groups, unexplained injuries, possession of weapons, fear of particular people or places, significant deterioration in learning or well-being, unexplained money or possessions, threats online, or known links to criminal networks.

Any concern that a learner has a weapon, has access to a weapon, has threatened to use one, or is involved in escalating violence must be reported to the DSP immediately. The DSP will assess immediate risk, secure safety, contact police and/or social services where required, inform relevant placing authorities and implement proportionate risk-management and support arrangements. Searches or confiscation will only be undertaken under the school's approved policy and lawful Welsh arrangements.

20.0 Honour-based abuse including FGM and forced marriage

Honour-based abuse describes abusive practices used to control behaviour in order to protect perceived family, community, cultural or religious "honour". It can include forced marriage, female genital mutilation (FGM), breast flattening/ironing, virginity testing, coercive control, threats, physical or sexual abuse, economic abuse and isolation. It is a safeguarding and child-protection matter.

20.1 FGM

Any concern that a girl may be at risk of FGM, or that FGM may have occurred, must be reported immediately to the DSP and managed under the Wales Safeguarding Procedures. Teachers in England and Wales have a specific statutory duty under section 5B of the Female Genital Mutilation Act 2003 to report directly to the police where, in the course of their professional work, they discover that FGM appears to have been carried out on a girl under 18. This direct teacher duty does not replace the need to inform the DSP and consider a report to social services.

20.2 Forced marriage

The legal minimum age for marriage in England and Wales is 18. It is an offence to cause a child to marry before their eighteenth birthday, including a non-binding or unofficial marriage, whether or not violence, threats or coercion are used. Concerns must be reported to the DSP and referred to social services/police as appropriate. The Forced Marriage Unit may be contacted for specialist advice. Parents or family members must not be contacted where doing so could increase risk.

21.0 Preventing radicalisation and the Prevent Duty

Section 26 of the Counter-Terrorism and Security Act 2015 places a Prevent duty on specified authorities, including proprietors of independent schools, to have due regard to the need to prevent people from being drawn into terrorism. The current Prevent duty guidance for England and Wales (2023) is statutory guidance and, for Welsh education settings, should be read alongside Keeping learners safe.

- The school will maintain a proportionate Prevent risk assessment informed by its learner profile, online environment and local/regional risk.
- Team members will receive Prevent awareness training and report concerns about susceptibility to radicalisation to the DSP.

- The DSP will consider the concern in its safeguarding context and use the current Prevent referral pathway/national referral form where appropriate. Immediate threats or suspected criminality are reported to police without delay.
- Online filtering, visiting-speaker arrangements, external visitors, curriculum and staff awareness will form part of the risk-management approach.
- Prevent must be implemented proportionately and must not be used to stigmatise learners because of religion, ethnicity, political discussion or protected characteristics.

22.0 Learners requiring support with their mental health

The school recognises the close relationship between emotional/mental well-being and safeguarding. Mental-health difficulties can be a response to trauma, abuse, neglect, exploitation, bullying or discrimination and may also increase vulnerability. Team members must not assume that concerning behaviour is explained solely by a diagnosis or known need.

- Record and report significant changes in behaviour, attendance, sleep, eating, self-care, social interaction, distress or engagement when they may indicate risk.
- Report self-harm, suicidal thoughts, suicide risk or significant deterioration to the DSP without delay and follow the school's emergency and clinical procedures.
- Where there is immediate danger to life or serious injury, call 999 or arrange emergency medical care. For urgent non-emergency health advice, use NHS 111 Wales/local health pathways.
- Use accessible communication and consider how ALN, or SEN/SEND where applicable, autism, learning disability, trauma or communication needs may affect how distress is expressed.
- Work with parents/carers and relevant professionals where safe and appropriate, and consider early intervention or statutory safeguarding reporting according to the level of risk.

The school will use the principles of the Welsh Government Framework on embedding a whole-school approach to emotional and mental well-being as good practice for promoting a safe, supportive culture, while recognising that diagnosis and specialist treatment are the role of appropriately qualified professionals.

23.0 Restrictive practices and physical intervention

Chestnut Hill School follows its Restrictive Physical Intervention / Restrictive Practices policy and the Welsh Government Reducing restrictive practices framework. Any restrictive practice must be lawful, necessary, proportionate, the least restrictive available option and used for the shortest possible time. It must never be used as punishment, to cause pain, humiliation or degradation, or simply to secure compliance where there is no lawful justification.

- Prevention, de-escalation, communication, environmental adaptation and positive support are prioritised.
- Individual risk assessments and support plans should identify foreseeable risks, agreed preventative strategies and any planned restrictive intervention.
- Any physical intervention is recorded promptly, including antecedents, reason, nature/duration, staff involved, injuries, medical checks and follow-up.
- Learners are offered a developmentally appropriate debrief and opportunity to communicate their experience; staff are also debriefed and learning is identified.
- Parents/carers and placing authorities are informed in accordance with policy and individual arrangements.
- Any allegation, unexplained injury or concern arising from an intervention is reported to the DSP and may require a Section 5 report to the LADO/DoS and/or a child-at-risk report.

Physical punishment of children is unlawful in Wales. The Children (Abolition of Defence of Reasonable Punishment) (Wales) Act 2020 removed the defence of reasonable punishment from 21 March 2022.

24.0 Allegations and safeguarding concerns about team members

Allegations and safeguarding concerns about people who work with children are managed in accordance with the Wales Safeguarding Procedures Section 5: Safeguarding allegations/concerns about practitioners and those in positions of trust (updated June 2026), together with the Group Managing Allegations Against an Employee Policy.

24.1 Section 5 threshold

The Section 5 procedures must be considered where it is alleged that a person who works directly or indirectly with children has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm; or
- behaved in their personal life in a way that indicates a potential transferable risk to children within their employment, volunteering or position of trust.

24.2 Immediate action

- Take the allegation seriously; do not investigate it with the learner or the adult concerned beyond what is necessary to establish immediate safety.
- Report immediately to the DSP and Head of School/Executive Head, unless the allegation concerns one of them, in which case report to the appropriate proprietor/governor/Group senior leader and LADO/DoS route.

- Protect the learner and any other children who may be at risk. The employer will complete an immediate risk assessment regarding the adult's duties and contact with children.
- Seek advice/report to Flintshire LADO/DoS through the current Section 5 route without delay and cooperate with any strategy discussion/meeting.
- Inform Group Safeguarding and HR in accordance with Group policy. Police/social services reports must not be delayed by internal notifications.
- Maintain confidentiality and ensure information is shared only on a need-to-know basis and in accordance with advice from the LADO/DoS/police/social services.

Agency, supply, contractor and self-employed workers remain within the Section 5 process where the threshold is met. The school will not simply cease to use a worker in place of ensuring the safeguarding concern is properly reported and resolved with the employing agency and statutory partners.

25.0 Low-level concerns

Chestnut Hill School uses the term "low-level concern" for a concern about adult conduct that causes unease or may be inconsistent with the Code of Conduct but does not, on the information currently known, meet the Wales Safeguarding Procedures Section 5 allegation threshold. "Low-level" does not mean unimportant.

- All low-level concerns must be reported and recorded promptly through the school's agreed process.
- The Head of School/Executive Head and DSP will consider whether the concern is a complaint, conduct matter, safeguarding concern or allegation and whether advice from the LADO/DoS is required.
- Patterns matter. Previous concerns must be considered because an accumulation of apparently low-level concerns can indicate emerging risk or suitability concerns and may reach the Section 5 threshold.
- Records will be reviewed periodically to identify repeated boundary concerns, unsafe practice, inappropriate language, favouritism, one-to-one practice, personal-device use or other patterns.
- Supply staff/contractor concerns will be shared with their employer where appropriate so that wider patterns can be identified.

26.0 Working with the LADO / Designated Officer for Safeguarding (DoS)

In Wales, the local authority LADO is the senior safeguarding role responsible for management and monitoring of allegations/concerns about practitioners and persons in positions of trust. The LADO role may be delegated to Designated Officers for Safeguarding (DoS). The school will use the current Flintshire Social Services/Section 5 route for advice and reporting.

The DSP/Head of School will provide information requested by the LADO/DoS, participate in Section 5 strategy discussions/meetings, implement agreed risk-management actions and keep records of decisions and rationale. The employer remains responsible for deciding whether and how the person can safely work while enquiries are ongoing, with advice from the LADO/DoS, police, social services, HR and regulators as relevant.

If the school believes a safeguarding response is not sufficiently protective or timely, the matter will be escalated through the local authority/North Wales professional challenge route and through Group senior safeguarding arrangements.

27.0 Whistleblowing

The school expects team members to raise concerns about unsafe practice, safeguarding failures, conduct or organisational culture. A learner cannot be safe in a setting where adults feel unable to speak up. Team members who cannot raise a matter through normal management or safeguarding routes should use the Group whistleblowing procedure or an appropriate external route.

The Group's Safecall service can be used to raise concerns confidentially on 0800 915 1571. This does not prevent a team member from contacting Flintshire Social Services, the LADO/DoS, police, EWC, a regulator or another prescribed external body where appropriate. Immediate concerns about a child's safety must be reported to statutory safeguarding agencies without delay.

28.0 Alternative provision, EOTAS and work experience placements

Where Chestnut Hill School commissions or arranges alternative provision, education otherwise than at school (EOTAS), college attendance, therapy, vocational activity or work experience, the school retains responsibility for ensuring the arrangement is suitable and that safeguarding risks are understood and managed. The learner's placing authority may hold additional statutory responsibilities and will be involved as required.

- Obtain and record appropriate written safeguarding assurances, including safer-recruitment/vetting arrangements, supervision, reporting contacts and procedures for notifying the school of staff changes or incidents.
- Assess the learner's individual vulnerabilities, ALN or SEN/SEND status where applicable, communication, transport, medical needs, lone-working exposure, online access and contact with members of the public.
- Agree attendance/check-in and emergency arrangements and ensure unexplained absence is shared promptly.
- Ensure the provider knows how to report concerns to Chestnut Hill School and directly to statutory agencies where necessary.

- Monitor the placement's ongoing suitability and safeguarding effectiveness rather than treating checks as a one-off exercise.
- For EOTAS, ALN or cross-border SEND placements, take account of current Welsh Government EOTAS/ALN guidance and, where applicable, the learner's IDP, Education, Health and Care Plan (EHC plan/EHCP) or other statutory plan.

28.1 Work experience

Before work experience, the school will undertake a proportionate safeguarding assessment of the placement, including the nature and frequency of contact with adults, supervision, travel, lone working, the age and needs of the learner and whether any adult role constitutes regulated activity. Required DBS or other checks and written assurances will be obtained in line with law, school policy and placing-authority requirements. Learners will receive clear information about boundaries, reporting and who to contact if they feel unsafe.

29.0 Digital and remote learning

School safeguarding policies, professional boundaries and the Code of Conduct apply equally to remote and digital learning. The school will follow current Hwb safeguarding principles for online learning and its own Online Safety and Data Protection policies.

- Use school-approved platforms and accounts and comply with data-protection, privacy and information-security requirements.
- Plan online sessions so staff and learners use appropriate environments, dress and backgrounds and do not reveal unnecessary personal information.
- One-to-one voice/video work requires SLT approval and the agreed safeguarding controls, such as a second adult, parental awareness where appropriate, or an approved platform with auditable arrangements.
- Online comments, disclosures or behaviours that raise safeguarding concerns are reported to the DSP in the same way as face-to-face concerns.
- Illegal or sexual images of children must not be captured, copied or circulated as screenshots. Staff should preserve only lawful evidence necessary for reporting and follow DSP/police guidance.
- Personal telephone numbers and personal social-media accounts must not be used for routine communication with learners. Any exceptional urgent contact from a personal phone must follow school policy and be recorded.
- Remote resources must be age and developmentally appropriate and accessible to the learner's ALN, or SEN/SEND where applicable, and communication needs.

30.0 Home visits

Home visits must be planned with both learner safeguarding and staff safety in mind. Team members will follow the Lone Working Policy, inform a colleague/manager of the address, purpose, expected duration and return/check-in arrangements, and review known household or community risks before the visit. Wherever proportionate, two staff should attend where risk information indicates this is necessary.

Safeguarding information disclosed or observed during a home visit must be reported immediately to the DSP and recorded. If a child is in immediate danger, the visiting team member must contact emergency services and/or social services directly rather than waiting to return to school. Staff must maintain professional boundaries and should not undertake a visit where risk cannot be safely managed.

31.0 Policy review

This policy will be reviewed at least annually and sooner where there is a significant safeguarding incident, a material change to legislation or Welsh Government guidance, an update to the Wales Safeguarding Procedures, a change to local arrangements, or learning from audit, inspection, practice review or safeguarding data.

The DSP will lead the operational review with the Head of School and Safeguarding Governor. The proprietor/governing arrangements will provide oversight and ensure that required amendments are implemented. Contact details will be checked as part of every review and updated immediately if they change.

Review date: September 2026. Next scheduled review: September 2027.

Current external reference points

- [Keeping learners safe - Welsh Government](#)
- [Wales Safeguarding Procedures](#)
- [North Wales Safeguarding Board](#)
- [Flintshire Child Protection](#)
- [Independent schools registration and operational guidance - Wales](#)
- [ALN Code and guidance - Wales](#)
- SEND Code of Practice: 0 to 25 years - England (where an English local authority maintains an EHC plan for a learner)
- [Hwb: Web filtering and online safeguarding](#)
- [Prevent duty guidance: England and Wales \(2023\)](#)