

Child Protection and Safeguarding Policy

Telford and Wrekin



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<p>N.B.</p> <p>1) This policy is fully tailored to the procedures followed in each Telford and Wrekin CAT school. Further information on contextual safeguarding approaches for specific settings, in addition to those contained in this policy, is available as a separate appendix (Appendix 1) and can be found on individual schools' websites or by request from the school.</p> <p>2) Full contact details for all schools designated safeguarding members of staff can be found at the end of this policy in Appendix 3.</p>	

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community and world better than you found it.**

Table of Contents

TABLE OF CONTENTS	2
1. SUMMARY AND AIMS	5
POLICY AIMS:	5
2. SAFEGUARDING LEGISLATION AND GUIDANCE	6
3. SAFEGUARDING INFORMATION	7
A CHILD CENTRED AND CO-ORDINATED APPROACH TO SAFEGUARDING	7
THE ROLE OF OUR STAFF	8
STAFF TRAINING AND INDUCTION	8
EARLY HELP	9
YOUNG CARERS	10
ABUSE, NEGLECT AND EXPLOITATION	10
RECOGNISING ABUSE – INDICATORS OF ABUSE AND NEGLECT	11
PHYSICAL ABUSE	11
EMOTIONAL ABUSE	11
SEXUAL ABUSE	12
NEGLECT	12
INDICATORS OF ABUSE	12
4. SPECIFIC SAFEGUARDING ISSUES	13
CHILD-ON-CHILD ABUSE	13
CHILD-ON-CHILD SEXUAL VIOLENCE OR SEXUAL HARASSMENT	15
SEXUAL VIOLENCE	16
CONSENT	16
SEXUAL HARASSMENT	16
UPSKIRTING	17
HARMFUL SEXUAL BEHAVIOUR (HSB)	17
HATE CRIME	17
RACIST INCIDENTS	18
OUR APPROACH TO PREVENTING ALL FORMS OF CHILD-ON-CHILD ABUSE	19
OUR RESPONSE TO CHILD-ON-CHILD ABUSE, INCLUDING REPORTS OF SEXUAL VIOLENCE OR SEXUAL HARASSMENT AND HATE CRIME	19
THE IMMEDIATE RESPONSE TO A REPORT	20
RISK ASSESSMENT AND SAFETY PLANNING AND SUPPORT	20
ACTION FOLLOWING A REPORT OF CHILD-ON-CHILD ABUSE, INCLUDING SEXUAL VIOLENCE AND/OR SEXUAL HARASSMENT	21
OPTIONS TO MANAGE THE REPORT	21
ONGOING RESPONSE TO CHILD-ON-CHILD ABUSE, INCLUDING SEXUAL VIOLENCE, SEXUAL HARASSMENT AND HATE CRIME	23
CHILD CRIMINAL EXPLOITATION (CCE) AND CHILD SEXUAL EXPLOITATION (CSE)	23
CHILD CRIMINAL EXPLOITATION (CCE)	25
CHILD SEXUAL EXPLOITATION (CSE)	26
‘COUNTY LINES’	27
MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM (NRM)	27
MENTAL HEALTH	28
SERIOUS VIOLENCE	28
CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS	29
CHILDREN AND THE COURT SYSTEM	30
CHILDREN WITH FAMILY MEMBERS IN PRISON	30
CYBERCRIME	30
PARENT CONFLICT	30
DOMESTIC ABUSE	31
HOMELESSNESS	32

SO-CALLED ‘HONOUR-BASED’ ABUSE, INCLUDING FEMALE GENITAL MUTILATION AND FORCED MARRIAGE	32
FEMALE GENITAL MUTILATION (FGM)	33
FGM MANDATORY REPORTING DUTY FOR TEACHERS	33
FORCED MARRIAGE	34
PREVENTING RADICALISATION.....	34
THE PREVENT DUTY	34
CHANNEL.....	35
5. OUR RESPONSE TO SAFEGUARDING CONCERNS	36
WHAT TO DO IF YOU HAVE CONCERNS ABOUT A CHILD	36
REFERRAL AGENCIES.....	38
IMMEDIATE RESPONSE TO A CHILD OR PARENT.....	38
THE ROLE OF THE LOCAL AUTHORITY	40
RECORD KEEPING	41
WHAT TO DO IF YOU HAVE SAFEGUARDING CONCERNS ABOUT ANOTHER STAFF MEMBER	41
WHAT TO DO IF YOU ARE CONCERNED ABOUT ANOTHER’S SAFEGUARDING PRACTICE IN THE SCHOOL	43
6. THE MANAGEMENT OF SAFEGUARDING	43
OUR APPROACH TO SAFEGUARDING	43
POLICIES AND PROCEDURES.....	44
THE DESIGNATED SAFEGUARDING LEAD (DSL).....	44
MULTI-AGENCY WORKING.....	45
INFORMATION SHARING.....	45
OPPORTUNITIES TO TEACH SAFEGUARDING	47
ONLINE SAFETY	47
SAFE USE OF ELECTRONIC DEVICES.....	49
THE USE OF ‘REASONABLE FORCE’	50
HIRING OUT OUR FACILITIES AND/OR PREMISES	50
CHILDREN ABSENT FROM OR MISSING FROM EDUCATION (CME).....	51
ELECTIVE HOME EDUCATION (EHE).....	52
CHILDREN WHO NEED A SOCIAL WORKER (CHILD IN NEED AND CHILD PROTECTION PLANS).....	53
CHILDREN REQUIRING MENTAL HEALTH SUPPORT	53
SUICIDE INTERVENTION	54
LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN	54
THE DESIGNATED TEACHER FOR LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN	54
VIRTUAL SCHOOL HEADS	54
CARE LEAVERS	55
CHILDREN WHO HAVE SPECIAL EDUCATIONAL NEEDS AND/OR DISABILITIES (SEND) OR PHYSICAL HEALTH ISSUES	55
CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING.....	55
STAFF	56
PARENTS	56
CHANGING IN SCHOOL	57
7. SAFER SCHOOL CULTURE.....	57
SAFER RECRUITMENT	57
PRE-APPOINTMENT VETTING CHECKS, REGULATED ACTIVITY AND RECORDING INFORMATION.....	58
OTHER CHECKS THAT MAY BE NECESSARY FOR STAFF, VOLUNTEERS AND OTHERS	58
VISITORS	58
ALTERNATIVE PROVISION	59
ADULTS WHO SUPERVISE CHILDREN ON WORK EXPERIENCE	59
CHILDREN STAYING WITH HOST FAMILIES (HOMESTAY).....	59
HOST FAMILIES – HOMESTAY DURING EXCHANGE VISITS	60
PRIVATE FOSTERING	60
OUR ONGOING SAFEGUARDING OF CHILDREN AND THE LEGAL REPORTING DUTIES ON US.....	60

APPENDIX 1 - ADDITIONAL SCHOOL SPECIFIC SAFEGUARDING INFORMATION AND PROCEDURES	61
APPENDIX 2 – TELFORD AND WREKIN PREVENT PATHWAY	64
APPENDIX 3 - KEY SAFEGUARDING PERSONNEL IN SCHOOLS	65
KEY PERSONNEL IN GRANGE PARK PRIMARY SCHOOL	65
KEY PERSONNEL IN TELFORD LANGLEY SCHOOL	66
KEY PERSONNEL IN WINDMILL PRIMARY SCHOOL.....	67

1. Summary and Aims

This policy is one of a series in the school's integrated safeguarding portfolio. The Designated Safeguarding Lead (DSL) works alongside the Safeguarding Governor and Deputy Designated Safeguarding Leads (DDSLs) to ensure that the procedures cited in this policy are followed by all members of the school community, including visitors to the school.

The DDSLs are all fully trained in safeguarding procedures to the same level as the DSL. They support the DSL in responding to safeguarding concerns, including making initial referrals to Children's Social Care, attending a range of safeguarding meetings and supporting vulnerable pupils in, and when required out of, school hours. Just like the DSL, their safeguarding responsibilities are clearly outlined in their job descriptions.

Other documents which relate to safeguarding include: *Staff Code of Conduct (Behaviour Policy)*, *Safer Recruitment Policy*, *Allegations against Staff procedure*, *Children Missing Education procedures*, *Complaints procedure*, *Behaviour and Anti-Bullying Policy*, *Child-on-Child Abuse Policy* and *Online Safety Policy*.¹

The school's safeguarding arrangements are inspected by Ofsted under the judgements for leadership & management and also impact the judgement on the personal development, behaviour and welfare of children and learners.

This policy is available on the school website, via a link to the Community Academy Trust website, and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in school. Additional school specific safeguarding processes and further contextual safeguarding information is also available as an appendix to this policy on our school website.

Policy Aims:

We have a duty of care to all staff, pupils and their families. The safety and protection of all children is of paramount importance to all those involved in education. The aim of this policy is to make all within our setting feel safe, promote their welfare and have clear roles and responsibilities in place for that to happen. We are committed to inter-agency working to keep children safe. All of our community believe that our setting should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child. This includes ensuring that those children who have protected characteristics under the *Equalities Act, 2010* are respected, valued, feel secure and are encouraged and given opportunities to talk with trusted adults who listen to them.

In brief, this policy aims to:

- provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities;
- ensure consistent good practice;
- inform pupil, parents, staff and other stakeholders about our arrangements for safeguarding children;
- demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners;
- contribute to the school's safeguarding portfolio.

¹ All CAT Primary Schools also adhere to the *Statutory Framework for Early Years and Foundation Stage, 2024* (EYFS)

All child protection matters will be dealt with in line with *Telford and Wrekin Safeguarding Partnership (TWSP)* and *West Midlands Child Protection and Safeguarding Procedures* or, if relevant, the safeguarding partnership area in which children reside or of whom they are under the care.

2. Safeguarding Legislation and Guidance

Academies, free schools, independent schools, alternative providers of education - Section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 require proprietors of independent schools (including academies) to have arrangements to safeguard and promote the welfare of children who are pupils at the school. Community Academies Trust (CAT) fulfils this requirement by ensuring all due regard to the following legislation and guidance when devising this policy:

This policy has been devised with due regard for the DfE statutory guidance [Keeping Children Safe in Education, 2024](#) and should be read alongside the following:

Statutory Guidance

- [Working Together to Safeguard Children](#) DfE (Dec 2023)
- [Working Together to Improve School Attendance, DfE \(2024\)](#)
- [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings](#) (Feb 2022)
- [What to do if you're worried a child is being abused](#) DfE (March 2015)
- [Information sharing: advice for practitioners providing safeguarding services](#) DfE (May 2024)
- [The Prevent duty: Departmental advice for schools and childcare providers](#) DfE (Sept 2023)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation \(September 2023\)](#)
- [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (Jan 2020)
- [Multi-agency practice principles for responding to child exploitation and extra-familial harm](#)
- [Child sexual exploitation: guide for practitioners DfE \(February 2017\)](#)
- [Teaching online safety in school DfE \(January 2023\)](#)
- [Mental Health and Behaviour in Schools DfE \(November 2018\)](#)
- [Data protection: toolkit for schools DfE \(April 2024\)](#)
- [Promoting the education of children with a social worker](#) (Mar 2024)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)
- [Multi-agency statutory guidance on female genital mutilation \(2020\)](#)
- [Early Years Foundation Stage Statutory Framework \(2024\)](#)
- [Domestic Abuse - Statutory Guidance](#) (Home Office April 2023)

- [Teachers' Standards](#) (July 2021)

Legislation

- *The Children Act 1989* and *The Children Act (2004)*
- [The Human Rights Act, 1998](#)
- Section 5B (11) of the *Female Genital Mutilation Act (2003)*, as inserted by section 74 of the *Serious Crime Act (2015)*
- *The Rehabilitation of Offenders Act (1974)*
- *Safeguarding Vulnerable Groups Act (2006)*
- *Counterterrorism and Security Act (2015)* (and the *Prevent Duty* guidance)
- *The Education Act (2002)*
- *Education (Independent Academy Standards) (England) Regulations (2014)*
- *The Academy Staffing (England) Regulations (2009)*
- Part 1 of the schedule to the *Non-Maintained Special Academies (England) Regulations (2015)*
- *The Equality Act (2010)*
- *The Childcare (Disqualification) Regulations 2009* (and 2018 amendment)
- *The Childcare Act (2006)*
- *Public Sector Equality Duty (2012)*
- *Care Act (2014)*
- *Mental Capacity Act (2005)*
- *Domestic Abuse Act (2021)*

Guidance from the Local Safeguarding Partners

- [Telford and Wrekin Safeguarding Partnership \(TWSP\)](#);
- [West Midlands Child Protection and Safeguarding Procedures](#);
- If relevant, the safeguarding partnership area children reside in, under the care of or with designated responsibility.

In addition to the above, we also have regard for the Apprenticeship, Skills, Children and Learning Act 2002 (as amended). This policy has been developed in line with legal obligations, including, where applicable, the *Human Rights Act 1998*, the European Convention on Human Rights, the *Domestic Abuse Act 2021*, the *Children and Social Work Act 2017* the *Equality Act 2010* and the *Public Sector Equality Duty*.

3. Safeguarding Information

A child centred and co-ordinated approach to safeguarding

Our whole school community of pupils, parents, staff, volunteers and governors are an important part of the wider safeguarding system for our pupils.

It is everyone's responsibility to safeguard and promote the welfare of children; this includes everyone who comes into contact with children and their families. Everyone will consider, at all times, what is in the best interest for the child and ensure their practice is child-centred. This responsibility is set out in all staff job descriptions.

No one in the school will manage concerns about a child in isolation. Everyone will identify concerns, share information and take prompt action to ensure children and families receive the right help at the right time.

For the purpose of this policy, safeguarding and promoting the welfare of children² is defined as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

The term 'children' includes everyone under the age of 18.

The role of our staff

Our staff will identify concerns early, provide help for children, promoting their welfare and preventing concerns from escalating. They will provide a safe environment in which children can learn.

This school is committed to identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life.

The Designated Safeguarding Lead's (DSL) role and that of their Deputy DSLs, is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

Our staff maintain the attitude of 'it could happen here' where safeguarding is concerned. Staff must always act in children's best interest where they are concerned about a child's welfare. In accordance with the *Teacher Standards 2012*, all teachers, including the Headteacher, will safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties.

Our school believes that the safety, welfare and protection of all children is paramount and any delay in reporting concerns is unacceptable. All staff will adhere to the child protection procedures established by the TWSP.

Staff Training and Induction

All staff (paid or voluntary) will receive a robust induction to help them fully understand the safeguarding systems. In addition to this policy, this will include our *Behaviour Policy*, *Staff Code of Conduct*, *Child-on-Child Abuse Policy*, the Prevent Duty, how to respond to children who are absent from, or who go missing from education, our response to CSE and the role of the DSL, including their identity and that of their Deputy DSLs. We will provide copies of policies and a copy of at least Part One and Annex B, or Annex A if more appropriate, of *KCSiE 2024* to all staff at induction. We will maintain a record of induction.

At induction, all staff will receive appropriate safeguarding and child protection training, including online safety, which, amongst other aspects, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. They will also receive appropriate training in managing child-on-child sexual violence and sexual harassment. This training will be regularly updated at least every three years.

² Children includes everyone under the age of 18.

All staff will also receive regular safeguarding and child protection updates, including online safety and child sexual exploitation awareness, as required, and at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively. We will ensure staff training helps staff understand local safeguarding procedures and that it is integrated, aligned and considered as part of our whole school safeguarding approach in line with wider staff training and curriculum planning.

All staff will be made aware of the following:

- Telford and Wrekin's early help process and their role within it;
- The process for making referrals to children's social care and for statutory assessments under the *Children Act 1989*, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) and the role they might be expected to play in such assessments;
- What to do if a child tells them they are being abused, exploited or neglected;
- How to reassure victims they are being taken seriously and that they will be supported and kept safe;
- That children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful;
- That staff should be professionally curious and speak to the DSL or their deputies if they have concerns about a child; and
- That staff should build trusted relationships with children which facilitate communication.

We will encourage staff to consider the [TWSP](#) briefing on professional curiosity.

Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and children's social care. Staff will never promise a child that they will not tell anyone about a report of any form of abuse, neglect and/or exploitation as this may ultimately not be in the best interests of the child. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

Early Help

In our school we believe that any child may benefit from early help and we ensure that all staff are alert to the potential need for early help for a child who:

- is disabled or has certain health condition and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, care or home;
- has experienced multiple suspensions, is at risk of being permanently excluded from school and is in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking or sexual and/or criminal exploitation;
- has a parent or carer in custody or is affected by parental offending;

- is at risk of being radicalised or exploited;
- is in a family whose circumstances present challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of so-called ‘honour-based’ abuse, such as Female Genital Mutilation or Forced Marriage;
- is at risk of being radicalised or exploited;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.

We ensure that all children that disclose that they have taken an overdose go to the Emergency Department at the nearest hospital to be checked by a medical professional in line with the [TWSP Procedure for the management of overdoses, involving children within schools and colleges](#).

Young carers

Legislation defines a ‘young carer’ as ‘. . . a person under 18 who provides or intends to provide care for another person (of any age, except where that care is provided for payment, pursuant to a contract or as voluntary work).’ A young carer might look after someone because they are sick or have a disability or mental health issues. Or, if a parent or family member has an alcohol or drug problem, they may be unable to care for themselves or anyone else.

We recognise the responsibilities of young carers are wide and varied but can include:

- practical tasks, such as cooking, housework and shopping;
- physical care, like helping someone out of bed;
- emotional support, including talking to someone who is distressed;
- personal care, such as helping someone dress;
- managing the family budget and collecting prescriptions;
- helping to give medicine;
- helping someone communicate, and
- looking after brothers and sisters.

Caring for someone can be very isolating, worrying and stressful for children. For young carers, this can negatively affect their experience in education. We recognise that many young carers will regularly miss school/college and that this can have a lasting effect on their life chances.

Our aim is to work with families and other agencies to identify young carers to ensure that their needs are assessed and where necessary supported. We will work with the [Telford and Wrekin Young Carers Service](#) to do this.

Abuse, neglect and exploitation

All staff members are trained on the indicators of abuse, neglect and exploitation and know what to look out for to help them identify children who may be in need of help or protection. Staff understand that children can be at risk of harm inside and outside of school or the home and both face-to-face and online. They will exercise professional curiosity because this is vital for the early identification of abuse and neglect.

We believe that abuse, neglect, exploitation and other safeguarding issues are rarely stand-alone events. All staff, but especially the DSL and their deputies, will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms.

All staff are aware that technology is a significant component in many safeguarding and well-being issues. We understand children are at risk of abuse online as well as face-to-face. In many cases, abuse will take place concurrently both via online channels and offline. Children can also abuse other children online; this can take the form of abusive, harassing and misogynistic/misandristic messages, the non-consensual sharing of indecent images, especially around chat groups and the sharing of abusive images and pornography to those who do not wish to receive such content.

Recognising abuse - Indicators of abuse and neglect

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

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

Physical abuse

Physical abuse is a form of abuse which 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. This used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness.

The fabrication or induction of illness (FII) in children is a relatively rare form of child abuse. Where concerns exist about FII, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed 'a vital piece of information'. This school will adopt the guidance [Safeguarding children in whom illness is fabricated or induced](#) and TWSP FII Best Practice Guidance.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 a child's developmental capability, as well as overprotection and limitation of exploration and

learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff are aware of our school's policy and procedures for dealing with this. (See Child-on-Child Abuse below).

Neglect

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, for example, 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);
- ensure access to appropriate medical care or treatment.

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

Indicators of abuse

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

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

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;

- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour - from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development;
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

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

It is very important that staff report all of their concerns, however minor or insignificant they may think they are - they do not need 'absolute proof' that the child is at risk.

4. Specific Safeguarding Issues

All staff are trained to identify a range of safeguarding issues that can put children at risk of harm, as outlined below.

Child-on-child abuse

All staff are aware that children can abuse other children. This can happen inside or outside of our setting and online.

All staff will be trained in our policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding to where they believe a child may be at risk from it.

All staff understand that even if there are no reports in our school it does not mean it is not happening; it may be that it is just not being reported. When staff have any concerns regarding child-on-child abuse, even if there are no reports, they should still speak to the DSL (or a deputy).

All staff are expected to challenge inappropriate behaviours between children, examples of which are listed below, that are actually abusive in nature. Downplaying certain behaviours

by, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including online, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children, sometimes known as ‘teenage relationship abuse’;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm³;
- sexual violence, such as rape, assault by penetration and sexual assault⁴;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, as defined below; and
- initiation/hazing-type violence and rituals - this could include activities involving harassment, abuse or humiliation, used as a way of initiating a person into a group and may also include an online element.

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

- educating all governors, strategic leaders, staff, pupils and parents about this issue;
- 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 the curriculum;
- engaging parents on these issues;
- supporting the ongoing welfare of children and young adults by drawing on multiple resources that prioritise their mental health, and by providing in-school counselling and therapy to address underlying mental health needs;
- working with governors, school leaders and all staff, pupils 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 to which our pupils can aspire and fostering a whole-school culture through which our pupils can appreciate safe and healthy relationships;
- 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 DSL and deputies so that they can spot and address any concerning trends and identify pupils who may be in need of additional support.

This school actively engages with TWSP in relation to child-on-child abuse, and works closely with, for example, children’s social care, the police and other education settings. The relationships the school has built with these partners are essential to ensuring that we are able to prevent, identify early, and appropriately handle cases of child-on-child abuse. The

³ This may include an element of online abuse which facilitates, threatens and/or encourages physical abuse

⁴ This may include an element of online abuse which facilitates, threatens and/or encourages sexual violence

DSL (or deputy) will regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

This school recognises that any child can be vulnerable to child-on-child abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. We know that research suggests:

- child-on-child abuse may affect boys differently from girls (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously;
- children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and
- some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

Child-on-child sexual violence or sexual harassment

All those who are part of our community believe that sexual violence and sexual harassment is not acceptable and will not be tolerated.

We understand that sexual violence and sexual harassment can occur between two or more children of **any age and sex**. It can occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap.

We recognise that children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attend(s) our school.

We will work to ensure that our whole school community are aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

Dismissing or tolerating such behaviours risks normalising them.

For the purpose of this policy, we use the term 'victim', 'alleged perpetrator(s)' or where appropriate 'perpetrator(s)'. Ultimately, the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis.

Along with providing support to children who are victims of sexual violence or sexual harassment, we will provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. We recognise that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of our setting. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

We understand that reports of sexual violence and sexual harassment are extremely complex to manage. We know it is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. We also know it is also important that other children and our staff are supported and protected as appropriate.

We will exercise professional curiosity and remain vigilant, responding appropriately to **all reports and concerns**, including those outside of our setting, and/or online.⁵

Sexual violence

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way both inside and outside of our setting. We refer to sexual violence as sexual offences under the *Sexual Offences Act 2003* as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity with consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent

We believe that **consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

All of our staff understand that:

- child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual harassment

⁵ This policy focuses on protecting all pupils, including those over the age of 18, as applicable. In cases of sexual violence and harassment of these pupils we will engage with adult social care, support services and the police as appropriate.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline both inside and outside of our setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes;
- displaying pictures, photos or drawings of a sexual nature;
- upskirting;
- online sexual harassment. This may be standalone or part of a wider pattern of sexual harassment and/or sexual violence;
- non-consensual sharing of nudes and semi-nude images and/or videos.⁶

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the *Upskirting Act*, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Harmful Sexual Behaviour (HSB)

Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This is referred to as “harmful sexual behaviour” (HSB). **HSB can occur online and/or face to face and can also occur simultaneously between the two.** We will consider HSB in a child protection context.

We will follow the specialist support and advice on HSB available from the specialist sexual violence sector. Our DSL will undertake training in HSB and incorporate this into our approach to managing sexual violence and sexual harassment. This training will include the [Brook Sexual Behaviours Traffic Light Tool](#).

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We understand it is important that they are offered appropriate support.

Hate crime

A hate crime, or hate incident, is an act motivated by, or perceived to be motivated by, prejudice against who the victim is, or what they appear to be, in relation to their race,

⁶ We will follow the guidance set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

religion, sexual orientation, gender identity, or disability. These are known as ‘protected characteristics’. It does not matter if the person targeted has the characteristic towards which the prejudice is directed, only that they are *perceived* to have that characteristic or belong to that community.

A hate crime does not have to amount to a criminal offence to be considered a hate crime. Non-criminal hate crime incidents can still be reported to the police to be recorded. Evidence of a hate crime is not required - it is enough that one person, such as the victim or a witness, perceives the incident to be a hate crime.

The Police and Crown Prosecution Service define hate crime as: "Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity."

Hate Crime covers a range of behaviours, including discrimination, exclusion, verbal abuse, physical assault, bullying, including online bullying and inciting hatred.

Hate Crime can manifest in the school environment. Our response may involve action and support from various agencies, including statutory agencies or educating the perpetrator about their language and impact. Following the incident, we will schedule check-ins with the victim to check on their well-being and ensure the issue has not continued.

All hate crime incidents reported in our school will be recorded. The DSL will regularly review this data to identify emerging themes and inform preventative and responsive work around hate crime.

Racist incidents

A racist incident is "any incident which is perceived to be racist by the victim or any other person", according to the Stephen Lawrence Inquiry report.

We will comply with the *Equality Act 2010*, and not unlawfully discriminate against pupils or prospective pupils on the grounds of race (or other protected characteristics).

In line with the public sector equality duty (PSED) we will:

- Eliminate discrimination and other conduct that is prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not share one;
- Foster good relations across all characteristics - between people who share a protected characteristic and those who do not share one;
- Comply with both specific education law on exclusions, and general law on discrimination, when suspending or permanently excluding pupils.

All racist incidents reported in our school must be recorded.

Telford and Wrekin Council requires all schools and colleges to report racist incidents on an Individual and Annual Return, Racist Incident Reporting and Recording System (IRIS). The reporting of incidents should take place within seven days of the incident being reported or as soon as reasonably practicable. The DSL will regularly review this data to identify emerging themes and inform preventative and responsive work around racist incidents.

We will manage racist incidents in line with our behaviour, anti-bullying and child-on-child abuse policies.

Our approach to preventing all forms of child-on-child abuse

We will undertake pre-planning, training for staff and implement an effective child-on-child abuse policy to help us develop the foundation for a calm, considered and appropriate response to any reports. We will review these regularly. The DSL or a deputy will engage with the local response to child-on-child abuse.

We understand the best responses to child-on-child abuse are based on a whole school approach to safeguarding and child protection and will involve our whole community in this.

Systems are in place which are well promoted throughout our school and understandable and accessible for our pupils to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

All staff in our school will undertake training in how to respond to child-on-child abuse, including reports of sexual violence or sexual harassment. Our DSL is also trained to manage such reports.

We accept the most effective preventative education programme will be through a whole setting approach that prepares pupils for life in modern Britain. Our school has a clear set of values and standards, and these are upheld and demonstrated throughout all aspects of school life. This is underpinned by our *Behaviour Policy* and pastoral support system, and by our planned programme of evidence-based content, delivered through the curriculum. Our programme is developed to be age and stage of development appropriate. The DSL will support teachers in their delivery of this part of our curriculum. We recognise good practice allows children an open forum to talk through things and that such discussions can lead to increased safeguarding reports. Children will be made aware of the processes to raise their concerns or make a report and how any report will be handled. This will include processes when they have a concern about a friend or peer. All staff are aware of how to support children and how to manage a safeguarding report from a child.

The DSL will consider if external support or intervention is necessary as part of our approach to sexual violence and sexual harassment. We recognise specialist organisations can offer a different perspective and expert knowledge.

Our response to child-on-child abuse, including reports of sexual violence or sexual harassment and hate crime

The school will work to safeguard pupils from sexual violence and sexual harassment and will respond to reports of specific incidents in accordance with Part 5 of *KCSiE 2024* which all staff working directly with children are encouraged to read, and Annex B of *KCSiE 2024*, as necessary.

It is our aim to always recognise, acknowledge and understand the scale of harassment and abuse. We aim to never downplay some behaviours related to abuse that can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it and not coming forward to report it.

Where necessary we will work with other professionals, agencies and partners in our response. This may include the TWSP partners, the relevant local authority children's social care departments, the police, the NSPCC and online services, such as The UK Safer Internet Centre, Internet Watch Foundation and Thinkuknow.

We recognise that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and to which they will react. In some cases, the victim may not make a direct report.

The immediate response to a report

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by another child, or that a child may be at risk of abusing or may be abusing another child, they should discuss their concern with the DSL (or a deputy) without delay.

We will reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of our school will not be downplayed and will be treated equally seriously. We will never give a victim the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual harassment. Nor will we make a victim feel ashamed for making a report. We will explain that the law is in place to protect children rather than criminalise them. This will be explained to pupils in such a way that avoids alarming or distressing them.

Risk assessment and safety planning and support

We take the view that child-on-child abuse does happen, even if it is not reported. Therefore, on the advice of the TWSP and through engaging with the Farrer & Co toolkit, we implement a risk and needs assessment to help to minimise the risk of child-on-child abuse.

As per the advice of TWSP, we refer to 'safety planning and support', which is used for individual children in response to an alleged or actual incident of child-on-child abuse, including sexual violence and where appropriate, incidents of sexual harassment.

When there has been a report of sexual violence, the DSL (or a deputy) will implement an immediate safety and support plan to identify risk and need. Where there has been a report of sexual harassment, the need for a safety and support plan will be considered on a case-by-case basis, but as good practice should be completed.

The risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator/s;
- all the other children (and, if appropriate, adult pupils and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms; and
- the time and location of the incident and any action required to make the location safer.

If any of the children involved has SEND, the DSL will liaise with the SENCO to assist in the management of the report. If the report involves an online safety element, any Deputy DSLs will liaise with the DSL, as online safety lead.

Safety and support plans must be recorded (written or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all of our pupils and put adequate measures in place to protect them and keep them safe. Safety and support planning will involve the relevant pupils, parents and professionals.

The DSL (or a deputy) will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional safety and support plans by social workers and/or sexual violence specialists will be required. Our safety and support plan is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform our approach to supporting and protecting our pupils and updating our own risk assessment.

Action following a report of child-on-child abuse, including sexual violence and/or sexual harassment

Our DSL (and deputies) have a complete safeguarding picture and they are the most appropriate people to advise on our initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with our duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between children;
- are there ongoing risks to the victim, other children or staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always, when concerned about the welfare of a child, all staff will act in the best interests of the child. In all cases, we will follow general safeguarding principles. Immediate consideration will be given as to how best to support and protect the victim, the alleged perpetrator(s) and any other children involved/impacted.

The starting point regarding any report will always be that there is a zero-tolerance approach to sexual violence and sexual harassment; it is never acceptable and it will not be tolerated.

As a matter of effective safeguarding practice, we will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, especially where a case is progressing through the criminal justice system.

Options to manage the report

When to inform the alleged perpetrator(s) will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, we will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and will not stop us taking immediate action to safeguard our children, where required.

We will regularly review our decisions and actions, consider our relevant policies and any lessons learnt. We will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. Consideration will be given to whether there are wider cultural issues within our setting that enabled the inappropriate behaviour to occur and where appropriate, extra teaching time and/or staff training may be delivered to minimise the risk of it happening again.

The DSL/DDSL will 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 dealt with internally and, if so, whether any external specialist support is required. The DSL/DDSL will consult the relevant local partnership threshold guidance to support their decision making and will engage in discussions with the statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered as part of the local arrangements.

In complex cases the DSL/DDSL may consult with Family Connect, and/or other relevant agencies on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL/DDSL 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/DDSL will contact Family Connect or the local social care team for the child and/or the police immediately and, in any event, within 24 hours of the DSL/DDSL becoming aware of the alleged behaviour. The DSL/DDSL will discuss the concerns or allegations with the agency and agree on a course of action, which may include:

- managing internally;
- initiating early help;
- referring to children's social care; and
- reporting to the police.

In line with managing internally, the DSL/DDSL may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

All concerns, discussions, decisions and reasons for decisions will be recorded, using the school's recording system.

If bail conditions are in place, we will consider what additional measures may be necessary to manage any assessed risk of harm that may arise within our school.

There may be delays in any case that is being progressed through the criminal justice system. We will not wait for the outcome - or even the start - of a police investigation before

protecting the victim, alleged perpetrator(s) and other pupils in the school. The DSL/DDSL will work closely with the police and other agencies as required, to ensure any actions we take do not jeopardise the police investigation.

If a child is convicted or receives a caution for a sexual offence, we will update our risk assessment. We understand it is important that we ensure both the victim and alleged perpetrator(s) remain protected. Where cases are classified as “no further action” by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator(s).

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Family Connect or the relevant children’s social care team may be appropriate. If a report is shown to be deliberately invented or malicious, disciplinary action against the individual concerned will be considered in line with our *Behaviour Policy*.

Ongoing response to child-on-child abuse, including sexual violence, sexual harassment and hate crime

In line with our policy and procedures with regard to child-on-child abuse, we will employ the principles of effective safeguarding practice to help shape any decisions regarding safeguarding and supporting the victim and the alleged perpetrator(s). We will consider what actions are most appropriate to support all children involved.

Victims may not talk about the whole picture immediately. It is essential that dialogue is kept open and encouraged. We will offer victims a designated trusted adult in our school to talk about their needs.

A victim of sexual violence is likely to be traumatised and may struggle in a normal classroom environment. We will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups. There may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons/activities. This will be the victim’s choice and not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

Whilst we will give all the necessary support to victims to remain in our school, if the trauma results in the victim being unable to do this, alternative provision or a move to another setting will be considered to enable them to continue to receive suitable education. This will only be at the request of the victim (and following discussion with their parents/carers).

We will always check in with all pupils involved or alleged to have been involved in child-on-child abuse that are in our school. This is to ensure our procedures have been followed and to understand their perception of the effectiveness of our procedures.

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

This school recognises CCE and CSE⁷ are forms of abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity This may involve being:

- in exchange for something the victim needs or wants; and/or

⁷ [Child sexual exploitation: guide for practitioners](#)

- for the financial advantage or increased status of the perpetrator or facilitator; and/or
- through violence or the threat of violence.

The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.

CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including 16 and 17 year olds who can legally give consent to have sex. It can include children who have been moved for the purpose of exploitation.

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation and sexual exploitation.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation; where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

We will provide additional support to children who have been exploited to help maintain them in education.

Staff understand that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, they are aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

If we feel that children may be being abused through exploitation, we will follow the Telford & Wrekin Council exploitation care and support pathway. We will always consider the Telford & Wrekin Council, 'explore more' document to support us in working with children and young people to understand what sort of matters may indicate that a child or young person is being sexually exploited. We will consult in the normal way with the relevant local authority social care team to seek advice through consultation. The concerns will be followed through sensitively and appropriately with fellow professionals and the CE referral form will be completed. In relation to the CATE Risk Panels, where concerns are expressed around a child attending our setting, we will ensure attendance whenever possible as part of the

established multi-agency process. Alongside this, we have taken the same steps and made all staff aware of the *TWSP A guide for professionals* CATE leaflet.

We will make parents and carers, children and young people aware of the relevant TWSP CATE leaflets. We will provide them with information on the Child Exploitation and Online Protection (CEOP) command. Children and adults can use CEOP to report if they are concerned that a child is being sexually abused or groomed online.

We will take a proactive approach to minimising the risk of all types of exploitation. We will engage with lived experience work to benefit the whole school community, including staff, children and parents. All staff will receive annual training and updates on child exploitation.

Our curriculum includes a programme of age-appropriate CCE and CSE awareness-raising sessions for pupils that fully take into account the context of our locality.

The Headteacher and DSL/DDSL will exchange any relevant information with local partners in relation to exploitation as required to enable all professionals to react, monitor and protect children.

The DSL or a Deputy will attend regular networking meetings and/or briefings led by safeguarding partners which focus on child exploitation; they will provide any required information to partners and will ensure that parents/carers and pupils know which member of the DSL Team leads on CSE and can access them with ease.

We record all concerns about a child's welfare, including those relating to exploitation, especially CSE. We detail what the concerns are, what action was taken and what follow up is needed. The DSL will review all recorded safeguarding concerns regularly, especially those pertaining to CSE and CCE, to ensure all concerns are routinely recorded and shared with partner agencies, as appropriate.

We will carry out an annual review to consider the adequacy of our site security provision, including monitoring and recording any unauthorised access to our site, to ensure that our pupils are protected from potential perpetrators of child exploitation while at school. Any concerns will be shared as required with the police and/or Family Connect. Our Site Security Audit findings will be used to update and review our Site Security Risk Assessment.

We act in the spirit of the recommendations pertaining to schools and colleges from the report of the [Independent Inquiry Telford Child Sexual Exploitation](#), published July 2022.

We will use the Telford & Wrekin Partnership Threshold Guidance, [Child Exploitation Risk Threshold Indicator](#) to help identify the care and support needs of children involved in exploitation. Where care and support needs are identified as 'vulnerable,' 'complex' or 'acute,' we will refer to Family Connect. We will complete the West Mercia Police Protected Partner Intel form to share any relevant exploitation intelligence; this will be emailed to protect@westmercia.pnn.police.uk. In emergencies we will report information to the police via 999. For non-emergencies we will report information to the police via 101 or contactus@westmercia.police.uk.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting

or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

We recognise that this type of exploitation can trap children, as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something to which they have agreed or consented.

Child Sexual Exploitation (CSE)

We use the Telford & Wrekin Safeguarding Partnership definition of CSE. CSE is a type of modern slavery when a male or female under 18 is sexually exploited for the benefit or gain of someone else. The benefit or gain can come in many forms such as increased social status or financial gain. Some victims are also trafficked for the purpose of exploitation. Multiple tactics are used to exploit the child such as 'grooming' which is when the victim is given something, such as food, accommodation, drugs, alcohol, cigarettes, affection, gifts or money in return for performing sexual activities or having sexual activities performed on them. Other methods may include violence, bullying and intimidation, with threats of physical harm or humiliation. Abusers are increasingly using the internet to target vulnerable children. It can happen across any device that is connected to the web, like computers, consoles, tablets, mobile phones and smart speakers. Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming.

We also acknowledge the definition of CSE set out by the Department for Education. CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. It may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

We will make the following further information on signs of a child's involvement in sexual exploitation available to staff. [Child sexual exploitation: guide for practitioners](#)

'County Lines'

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store/sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including our school, other education settings, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing from school or home and are subsequently found in areas away from their home;
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters; and
- have their bank accounts used to facilitate drug dealing.

We will make the [Home Office](#) guidance on the signs of a child's involvement in county lines available to staff.

If a child is suspected of being at risk of or involved in county lines, a safeguarding referral will also be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation, such as [CLIMB](#).

Modern Slavery and the National Referral Mechanism (NRM)

Staff understand that Modern Slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

We know that information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#).

Mental Health

At this school all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

We recognise only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health concern or be at risk of developing one.

Where a child has a mental health need, we will implement a safety plan using guidance from the following sources.

- [Self-harm | Advice for young people | Get help | YoungMinds](#)
- [Self-care | Anna Freud](#)
- [Safety Planning - Every Life Matters \(every-life-matters.org.uk\)](#)

Safety plans will be dynamic and regularly reviewed.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff will be made aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by speaking to the DSL/DDSL and recording concerns. Where required, medical help will be sought. As with other medical conditions, we will always obtain confirmation of any mental health diagnosis from a suitable professional when diagnoses are self-reported or reported by parents/carers.

We follow the DfE guidance on [Mental Health and Behaviour in Schools](#).⁸

Serious violence

All staff are aware of the indicators, which may signal that children are at risk from, or are involved in, serious violent crime. These may include 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 well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

We recognise that the likelihood of involvement in serious violence may be increased by factors such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending. Staff are aware of the associated risks and understand the measures in place to manage these.

We will consider the risk in the hours just before and just after school, when pupils are travelling, as this is when violence can often peak and these times can be particular risky for young people involved in serious violence.

⁸ See also *Children requiring mental health support* section below.

We will follow the advice provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

We recognise to help prevent violence in our school this can require a mix of universal, targeted or specialist interventions. Our school leaders will aim to:

- develop skills and knowledge to resolve conflict as part of the curriculum;
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour;
- understand risks for specific groups, including those that are gender-based, and target interventions;
- safeguard, and specifically organise child protection, when needed;
- carefully manage individual transitions between educational establishments, especially into Pupil Referral Units (PRUs) or alternative provision; and
- work with local partners to prevent anti-social behaviour or crime.

In order to tackle violence affecting our school and the community, we know it is important to:

- understand the problems that young people are facing both in school and in their local community;
- consider possible avenues of support; and
- work with local partners (who may have valuable information, resources or expertise).

Working with the local community safety partnership, the Serious Violence Duty sub-group, the youth offending team and the neighbourhood police team will help us to achieve a full understanding of the context in which we are working. We will co-operate with the specified authorities, such as police, local government, youth offending teams, health and probation services as part of the *Police, Crime, Sentencing and Courts Act 2022*.

As part of our emergency management planning, we have in place systems for targeting and responding to individual or group violence. Even if violent incidents themselves do not appear to be an immediate concern, there may be a need to build resilience to such problems for the future.

Evidence shows that early-stage intervention is an effective strategy for preventing children becoming involved in violence, crime or anti-social behaviour later in life. We will assess what will work best in preventing violence in our school to decide who to involve in providing intervention.

Child abduction and community safety incidents

We recognise child abduction as the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

We know that other community safety incidents in the vicinity of our school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) we will give them practical advice on how to keep themselves safe. This may include outdoor-safety lessons run by teachers or other professionals. We will aim

to build children's confidence and abilities rather than simply warning them about all strangers.

Children and the court system

This school recognises that sometimes children are required to give evidence in criminal courts, for crimes committed against them or for other crimes they have witnessed. We will signpost them to the [guides for young people](#) and use these to support children and to ensure the correct process is followed and that support and special measures are made available.

We understand that child arrangements made via the family courts following separation can entrench conflict in families and can be stressful for children. We follow the guidance of the Ministry of Justice to help manage these situations.

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. We recognise that these children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will seek to support pupils in this position through pastoral care, early help and discussions with parents/carers and other family members, as appropriate. We will use the information from [NICCO](#), to help mitigate negative consequences for these children.

Cybercrime

We understand cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of service (DoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL/DDSL will consider referring into the Cyber Choices programme.

Parent conflict

We are committed to helping families to communicate better. We know that relationships are key and positive communication is what we want to see. Good quality relationships are a right and not a privilege. For many families, stress is a large part of everyday life and stress is often the reason relationships feel strained and communication is poor. Whilst it can be hard to eliminate stress from everyday life, we understand that we can work towards improving the way we react, by communicating in more constructive ways.

When supporting families, we have a unique opportunity to enable communication in a more positive manner as opposed to in a way that ultimately damages their relationship. We will

work with families using solution-focused ways to guide people towards working out what 'better' looks like for them. We understand this is a more effective strategy than offering our own advice and solutions.

When supporting families with struggling relationships we will:

- not assume we know what is going on but instead explore both parties' thoughts and feelings;
- be curious in attempting to discover what is really going on;
- encourage a culture of appreciation between the people we are supporting;
- remember that not everyone feels able to change; we can offer support, but family members need to want things to be different in order to make change happen, and
- remember that it is normal to feel uncomfortable sometimes talking to someone about their relationships. We will not try to fix things or give advice but instead ask thoughtful, open-ended questions.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. 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, well-being, development, and ability to learn.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child-safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

We will always liaise with agencies in a two-way process where domestic abuse and/or violence is a factor in a household. Children within our care will be appropriately supported. We are part of the Operation Encompass process where domestic incidents are shared directly with us, so that we have an initial awareness. To this end, we will be part of any agency referral, in a two-way process, such as the Domestic Violence Multi-agency Risk Assessment Conference (MARAC) and Multi Agency Public Protection Arrangements (MAPPA) or any other named agencies where these specific issues are a factor that may impair and/or impact on children's development.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

We will use the following additional advice on identifying children who are affected by domestic abuse and how they can be helped:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [SafeLives: young people and domestic abuse](#)
- [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#)
- [Home : Operation Encompass](#)

Homelessness

The school understands that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSLs are aware of how to contact and refer concerns to the [Local Housing Authority](#) so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and will not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

⁹ In most cases school staff will consider homelessness in the context of children who live with their families, and intervention will be on that basis. We recognise that in some cases, 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL /DDSL will ensure appropriate referrals are made based on the child's circumstances. In these cases we will follow the department and the Ministry of Housing, Communities and Local Government joint statutory guidance on the [provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation](#).

So-called 'honour-based' abuse, including Female Genital Mutilation and Forced Marriage

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take.

The school sees all forms of HBA as abuse, regardless of motivation and will handle and escalate as such. We will ensure our community are alert to the possibility of a child being at risk of, or already having suffered, HBA.

⁹ Post 16 provision only

Any concerns that a child might have suffered, or be at risk of, HBA will be reported to the DSL/DDSL as with any other safeguarding concern. As appropriate, they will activate the local safeguarding procedures by contacting Family Connect/local social care team for the child and if necessary, the police.

Female Genital Mutilation (FGM)

Female Genital Mutilation is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the *Female Genital Mutilation Act 2003*. Any person found guilty of an offence under the *Female Genital Mutilation Act 2003* is liable to a maximum penalty of 14 years' imprisonment or a fine, or both.

As a school we will follow the National FGM Centre [Female Genital Mutilation: Guidance for schools](#).

FGM mandatory reporting duty for teachers

Section 5B of the *Female Genital Mutilation Act 2003* (as inserted by section 74 of the *Serious Crime Act 2015*) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally 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 any such case with our DSL or deputy and involve children's social care as appropriate. The duty does not apply in relation to those at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow our local safeguarding procedures and report to Family Connect or the local social care team for the child. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

In respect of FGM we will adopt the local [FGM Practice Guidelines and Resource Pack](#) as part of safeguarding responsibilities and inform/educate our staff in this particular area.

Forced Marriage

We understand that forcing a person into a marriage is a crime in England and Wales. We know that a forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We play an important role in safeguarding children from forced marriage.

We will follow the Forced Marriage Unit published [statutory guidance](#) and [Multi-agency guidelines](#). Our staff can contact the Forced Marriage Unit if they need advice or information on: 020 7008 0151 or email fm@fco.gov.uk

Preventing Radicalisation¹⁰

As a school we understand children may be susceptible to extremist ideology and radicalisation into terrorism. Similar to our role in protecting children from other forms of harms and abuse, we will also protect children from this risk as part of our safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.
- Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are [factors which may indicate concern](#).

We understand that it is, where possible, our role to protect vulnerable young people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training, staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately. This includes reporting their concerns to the DSL/DDSL who will consider making a Prevent referral.

The Prevent Duty

This school is subject to a duty under section 26 of the *Counter-Terrorism and Security Act 2015* (the CTSA 2015), in the exercise of our functions, to have due regard to the need to prevent people from becoming terrorists or supporting terrorism. This duty is known as *The Prevent Duty*.

¹⁰ This section remains under review, following the publication of a revised definition of extremism in March 2024.

We see *The Prevent Duty* as part of our wider safeguarding obligation. The DSL, DDSLs and other strategic leaders are familiar with the revised [Prevent Duty Guidance: for England and Wales](#), especially paragraphs 141-210.¹¹

We follow the latest published advice for schools on the [Prevent Duty](#) and ensure all staff have completed training on The Prevent Duty.

Channel

Channel is a voluntary and confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so and will attend and engage with the Channel panel to assist in any assessment. We will follow the [Channel guidance](#).

If we feel children are being abused through extremism or being radicalised, we will consult directly with the local police Counter Terrorism Unit (CTU) This is done with a [Prevent referral form](#), following the Prevent flowchart (Appendix 2). The referral will be sent to the police. As with all referrals, this referral will be dealt with appropriately with professionals. If it is deemed from the Prevent team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently that is **Jas Bedesha**. jas.bedesha@telford.gov.uk. The education lead for Telford & Wrekin Council is **Joanne Hanslip**, joanne.hanslip@telford.gov.uk.

Where necessary, the DSL or the Deputy DSL will consult with the Telford and Wrekin professional lead, education lead or CTU officer: Alison Potts, a.potts@west-midlands.pnn.police.uk, or Holly Aungiers, holly.aungiers@westmerciapolice.uk to seek advice on making prevent referrals.

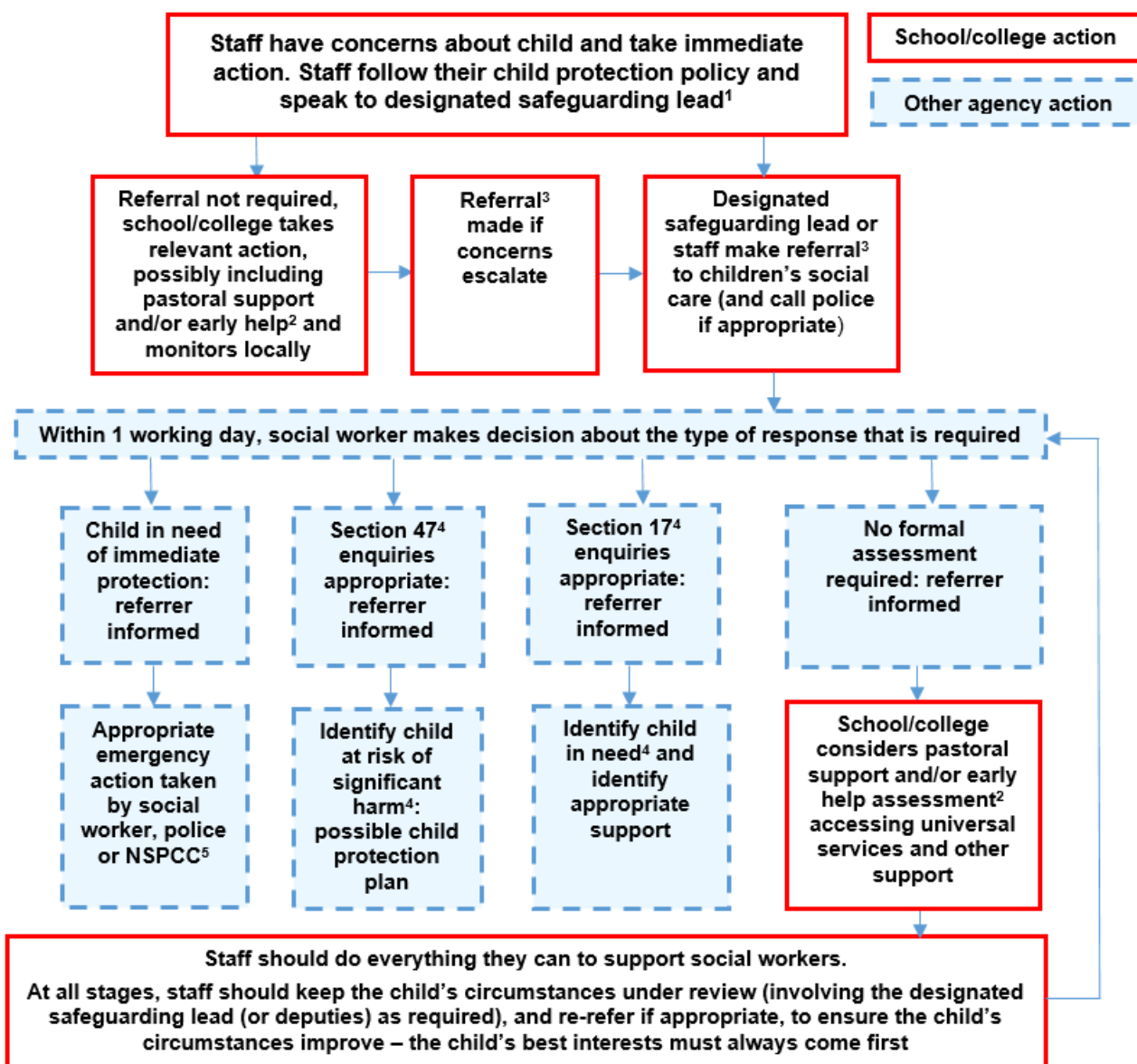
¹¹ Post 16 schools will follow the additional guidance: [Prevent duty guidance: for further education institutions in England and Wales](#).

5. Our Response to Safeguarding Concerns

What to do if you have concerns about a child

Our staff maintain the attitude of ‘It could happen here’ where safeguarding is concerned and will always act in the best interests of the child.

If staff have any concerns about the welfare of a child, they must act on them immediately. The chart below sets out the process for staff to follow when they have concerns:



When someone has a concern about a child's welfare they should speak to the DSL or DDSL, who will decide what to do next. Options include:

- managing any support for the child internally via the our own pastoral support processes;
- providing early help support and/or undertaking an early help assessment; or
- making a referral for statutory services, for example, as the child is in need or suffering, or likely to suffer, significant harm or impairment. This will involve contacting Family Connect or the local social care team for the child.

When making a referral to children's social care staff will ensure they are aware of the child's history, such as any previous concerns about the child or their family, so that they can share this information with children's social care staff.

The law does not say an age when parents can leave a child on their own, but it is an offence to leave a child alone if it places them at risk. The NSPCC says:

- children under 12 are rarely mature enough to be left alone for a long period of time
- children under 16 should not be left alone overnight
- babies, toddlers and very young children should never be left alone.

Where we discover a child under 12 has been left alone for long periods of time at home or in the community we will contact the police. We will never escort a child back to school where we find them alone at home or in the community. Where a child under 16 is alone and we feel it is placing them at risk, we will contact the police. Where children are alone because they have left school without permission and parents cannot locate the child quickly, we will view the child as being at risk and will contact the police. We will report all concerns about children being alone to the police via 101. If the child is in immediate danger we will report to the police via 999. We will then notify Family Connect or the emergency duty team as soon as reasonably practicable.

[NPCC- When to call the police](#) will be considered by the DSL to help them understand when they should consider calling the police and what to expect when they do.

All referrals to the local social team must be followed up in writing using the social care team's relevant referral/request forms. For referrals in Telford & Wrekin we will use the [Request for service form](#).

If in exceptional circumstances, the DSL or a deputy is not available, the person who has the concern should speak to a member of SLT and/or take advice from Family Connect or the local social care team for the child. In these circumstances, any action taken should be shared with the DSL/DDSL as soon as is practically possible.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. If in any doubt about sharing information, staff should speak to the DSL or DDSL.

In the unlikely event that a person in our school who has a concern for a child is not satisfied with the action taken by the DSL or DDSL, they should speak to them again to share their concerns. If they remain unsatisfied with the response, then the person who had the original concern should speak to another trained DSL to seek resolution. If, following speaking to another trained DSL, the person remains concerned that appropriate action has not been taken to safeguard or protect the child, the person should follow the school's whistleblowing procedures, reporting to the Headteacher or if the Headteacher has already been made aware, the Chair of the School Standards Committee and/or the Trust's Director of Safeguarding. In these circumstances, staff may also report their concern to Family Connect or the local social care team if they prefer.

Referral agencies

Telford & Wrekin social care team Family Connect 01952 385385 Out of Hours 01952 676500	Shropshire social care team First Point of Contact 0345 678 9021 Out of Hours 0345 678 9040	Staffordshire social care team Children’s Advice and Support Service 0300 111 8007 Out of Hours 0345 604 2886	Wolverhampton social care team MASH 01902 555392 Out of Hours 01902 552999
If you think a child is in immediate danger, call the police on 999 For non-emergencies, call 101			
Childline 0800 1111	NSPCC 0800 800 5000	Public Protection Unit (West Mercia Police): 0300 333 3000	

Immediate response to a child or parent

Staff will follow effective safeguarding practice which includes:

- where possible, managing reports with two members of staff present, (preferably one of them being the DSL or a deputy);
- where the report includes an online element, we will be aware of searching, screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the Police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children’s social care) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and to whom the report will be passed;
- recognising a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust; they should be supportive and respectful of the child;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child’s language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions - where, when, what, etc. or TED - ‘tell me’, ‘explain to me’ and ‘describe’. It is important to note that whilst leading questions should be avoided, staff may ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the

need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a first-hand written record is made;

- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. We are aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the DSL/DDSL, as soon as practically possible, if the DSL/DDSL is not involved in the initial report.

If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised.

We will never allow fears about sharing information to stand in the way of the need to promote the welfare and protect the safety of children. We expect concerns that arise in a morning to be reported to the DSL/DDSL by lunchtime that day at the very latest. Concerns that arise in an afternoon should be reported by, or as close as possible to, the end of the school day or as soon as reasonably practicable. Any concerns arising outside of the normal school day should be reported as quickly as possible. If in doubt, concerned parties should talk with the DSL or a DDSL. **Delay is unacceptable and may result in disciplinary action.**

Where a child is suffering, or is likely to suffer from harm or impairment, we will make a referral to children's social care (and if appropriate, the police) immediately. If we are unsure in which local authority the child lives we will use the online tool [Report Child Abuse to Your Local Council](#) to direct us to the relevant local children's social care contact number.

Children's social care assessments should consider where children are being harmed in contexts outside the home. Therefore, we will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The school's role is to refer with the information received and **under no circumstances** become the investigator.

We will work appropriately with each child, their family and other agencies to protect in all cases the welfare of the child. We will work in partnership, fulfilling the ethos and abiding by the principles of the [Telford and Wrekin threshold guidance](#) or the threshold guidance for the local social care team for the child.

Staff within this school may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases will be kept under constant review and consideration given to a referral to children's social care assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Staff will also be made aware of the process for making referrals to children's social care and statutory assessments under the *Children Act 1989*, especially *section 17* (children in need) and *section 47* (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

A **child in need** is defined under the *Children Act 1989* as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development

is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under *section 17* of the *Children Act 1989*.

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under *section 47* of the *Children Act 1989* if they have reasonable cause to suspect that a **child is suffering, or is likely to suffer, significant harm**. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse, neglect and exploitation, female genital mutilation or other so-called 'honour-based' violence, and extra-familial threats like radicalisation and sexual exploitation.

Where there are visible injuries, all staff should record these on a body map diagram and describe them the best they can. We will assume good evidential practice to get two persons involved who have seen the injury and can account for it on the body map, then immediately follow up with a referral as described above.

Under **no** circumstances will staff photograph injuries seen on children as our staff are not expert witnesses. If the concern is around non-accidental injury, then that is a matter that requires immediate attention on the day, resulting in an appropriate referral to Family Connect or the local social care team for the child. Those professionals will control the process of photographic evidence gathering and assessment.

For staff to interpret any concerns we will assess each incident as it appears. In respect of assessing any bruising to a child we will refer to the [Bruising of Children guidance produced by the TWSP](#) to assist in decision making.

The role of the local authority

Within one working day of a referral being made, a local authority social worker should acknowledge receipt of the referral to the school and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services;
- the child is in need, and should be assessed under *section 17* of the *Children Act 1989*;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under *section 47* of the *Children Act 1989*;
- further specialist assessments are required to help the local authority to decide what further action to take.

The referrer, even if they are not the DSL or Deputy, will follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, the school will consider following [TWSP local escalation procedures](#) or those of the safeguarding partnership for the child to ensure our concerns have been addressed and, most importantly, that the child's situation improves.

The Telford and Wrekin Council Director of Children's Services is Jo Britton.

Record keeping

All concerns will be recorded first-hand by the person raising the concern and passed to the DSL/DDSL in a timely manner. All concerns, discussions and decisions made, and the reasons for those decisions are recorded in writing using the school's recording system. Information will be kept confidential and stored securely. We keep concerns and referrals in a separate child protection file away from the child's main school file. Records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any actions taken, decisions reached and the outcome.

If in doubt about recording requirements, staff, supply staff and visitors will seek clarification from the DSL/DDSL.

Anyone with a safeguarding concern should follow these recording principles:

- record the date, time, place and context of disclosure or concern, recording facts and not assumptions, supposition or interpretation, and who you shared them;
- record where you spoke with the child or parent and personal safety details, such as 'I discussed the incident with the child in the headteacher's office with the door open' or justify if it was closed but naming those who you told this to be the case. If alone, explain that rationale by, for example, commenting, 'The child stated they would only confide in me if I was alone';
- if it is observation of bruising or an injury try to record detail, e.g. 'right arm, above elbow', 'bruise approximately 5cm in diameter noticed on back of lower right leg';
- note the non-verbal behaviour and the key words in the language used by the child or parent (try not to translate into 'proper terms' ensuring that you use the child or parent's own words). Body language should be noted and support any record of disclosure;
- retain on file signed original handwritten notes and pass them on to the DSL or a Deputy DSL who may ask you to complete a written referral to children's social care.

This school has adopted guidance from TWSP Workbook for Designated Safeguarding Leads and Governors with responsibility for safeguarding, incorporating: Advice note on Child Protection record keeping.

We ensure any written notes of concerns made are stored chronologically in a safeguarding file/electronically for that child.

All paper-based child protection records are clearly marked as such and are kept securely locked on the premises and/or electronically logged within CPOMS¹², or a similar package, where used. It should not be presumed that concerns logged by staff electronically have been seen immediately; a verbal conversation should also take place as soon as possible, ensuring absolute clarity regarding the concerns expressed.

What to do if you have safeguarding concerns about another staff member

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers or contractors) posing a risk of harm to children, then:

- this should be referred to the Headteacher; or

¹² CPOMS (Child Protection Online Management System) is one of a number of secure electronic record keeping systems available. Where used, a restricted number of named staff will have full access to the system.

- where there are concerns/allegations about the Headteacher, this should be referred to the chair of the School Standards Committee or may be reported directly to the Local Authority Designated Officer (LADO).

Any concern about the conduct of staff must be reported and recorded in writing using the school's reporting system and logged electronically and securely. Any allegations that may meet the harm threshold will be addressed as set out in Part four Section one of *KCSiE, 2024*. Any concerns that do not meet the harm threshold, referred to, as 'low level concerns' will be addressed as in Part four, Section two of *KCSiE*. When an allegation is made, the DSL will be responsible for ensuring that a child is not at risk and refer cases of suspected abuse to *Family Connect* or the child's local social care team.

We will **only** undertake basic enquiries to help determine whether there is any foundation to the allegation.

The LADO for Telford and Wrekin, **Glenn Ashbrooke**, will be informed of all allegations that come to our attention and appear to meet the criteria set out in Part four Section one of *KCSiE*, so that he can consult police and children's social care, as appropriate. All LADO referrals must be made via *Family Connect*, unless the subject child is open to a social worker, and then the LADO referral must be made via the child's allocated social worker.

The School Standards Committee will be notified of any allegations or low-level concerns at each scheduled meeting. The governor responsible for safeguarding will be informed soon after the allegation or low-level concern has been received. Their role is not to know details of the persons involved or the concern but ensure policies and procedures are adhered to and to provide relevant support.

We will make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.

We believe that those who work within our community are in positions of trust and as such our *Staff Code of Conduct*, which is in place for staff, volunteers, contractors and governors, is based on the underlying principle that the highest standards are expected from all, in line with *KCSiE, 2024*.

[Guidance for safer working practice for those working with children and young people in educational settings](#) produced by the *Safer Recruitment Consortium*, provides excellent guidance on the expected standards of all who work with children. We will make our school community aware of its existence and this will work alongside the *Code of Conduct* mentioned above and other established human resources processes currently in place.

To help avoid potential allegations and safeguarding concerns and for the safety and welfare of pupils and the protection of staff, we will make classrooms highly visible places whereby easy viewing is possible. The masking of windows is forbidden and as such treated as a safeguarding issue for the protection of all. There may be exceptional circumstances where masking of classrooms is needed and justified, for example, for the teaching of drama; in these cases the Headteacher will make a judgement on a case-by-case basis being appropriate, balanced and proportionate.¹³

¹³ Please see our procedure for managing safeguarding concerns or allegations against staff, including supply staff, volunteers and contractors.

What to do if you are concerned about another's safeguarding practice in the school

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our school's safeguarding regime and know that such concerns will be taken seriously by our strategic leadership team, in line with our *CAT Whistleblowing Policy*.

Where staff feel that they cannot report a concern through the above channels, general guidance can be found at [Advice on whistleblowing](#). The [NSPCC Whistleblowing Adviceline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk

6. The Management of Safeguarding

The school has a designated governor with responsibility for safeguarding, including online safety and Prevent. This governor has a strategic leadership responsibility for our safeguarding arrangements and must ensure that we comply with safeguarding legislation. They must have regard to *KCSiE 2024*, ensuring our policies, procedures and training are effective and comply with the law at all times.

Our governors work with leaders to set a clear vision and approach with a focus on pupil well-being, safeguarding and child protection. This includes actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.

All governors complete child protection and safeguarding training, including training on online safety, as part of their induction and at least annually thereafter. This ensures that they have the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies in our school are effective and to support the delivery of a robust whole setting approach to safeguarding..

The SSC will act under their obligations under the Data Protection Act 2018, the UK GDPR, *Human Rights Act 1998*, the *Equality Act 2010*, including the *Public Sector Equality Duty* and their local multi-agency safeguarding arrangements.

The Headteacher ensures that the policies and procedures adopted by the SSC and the Trust Board of Directors are understood and followed by all staff.

Our approach to safeguarding

This SSC will ensure that we facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and our policy development. Ultimately, all systems, processes and policies will operate with the best interests of the child at their heart.

Where there is a safeguarding concern, our SSC and our SLT will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated

seriously, and knowing they can safely express their views and give feedback. We will work with children to remove any barriers to reporting.

We will facilitate staff to contribute to and shape our safeguarding arrangements and *Child Protection and Safeguarding Policy*.

We will ensure that suitable arrangements are in place to provide access to safeguarding supervision for staff members.

Policies and Procedures

We aim to ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

The Designated Safeguarding Lead (DSL)

All schools are required to appoint a member of the strategic leadership team to take ultimate responsibility for safeguarding and child protection. This member of SLT, the DSL, co-ordinates all child protection arrangements, including online safety. The DSL and all DDSLs will fulfil their role and responsibilities as set out in Annex C of *KCSiE, 2024*. Their safeguarding responsibilities are detailed in their job descriptions.

The DSL and DDSLs will liaise with TWSP and work with other agencies in line with *Working Together to Safeguard Children, 2023*. **Information regarding and contact details for all key safeguarding personnel can be found in Appendix 3 of this policy.**

During term time, in school hours, the DSL and/or a deputy will always be available for staff to discuss any safeguarding concerns. During out of hours/out of term time, appropriate cover is provided by ensuring the DSL or DDSL is contactable.

Prior to any education visit, a risk assessment will be completed to consider if the DSL or DDSL needs to be present. We will always consider how quickly a DSL can respond to a safeguarding issue if they are not present. Where safeguarding concerns are raised during an educational visit, the DSL/DDSL must be notified immediately, even if they are not physically present at the site of the educational visit. They will liaise with the person responsible for the education visit to manage the concern and refer to the relevant agencies.

The DSL and any deputies will undergo two-day 'newly-appointed designated safeguarding lead' training as recognised by TWSP to provide them with the knowledge and skills required to carry out the role. They will attend one day DSL refresher training as recognised by TWSP every two years. In addition to their formal training as set out above, their knowledge and skills will be updated, for example, via Telford & Wrekin Council's Education Safeguarding noticeboard updates, attending termly DSL refreshers and taking time to read and digest safeguarding developments, at regular intervals, and at least annually, to keep up with any developments relevant to their role. We aim to ensure at least one DSL or DDSL attends each termly update. Training will then be disseminated to all relevant staff and governors, as appropriate.

The DSL will form part of a borough wide network, where information is shared, in a two-way process, with the *Telford & Wrekin Council Education Safeguarding Team*. They will maintain and up to date knowledge of local learning published by TWSP and will disseminate this learning to staff, leaders and governors, as appropriate.

The DSL will complete the *Safeguarding Audit - Education* each year and submit to TWSP. The *Safeguarding Audit - Education*, will be supplied by the *Telford & Wrekin Council Education Safeguarding Team*.

Multi-agency working

The DSL/DDSL will work with other agencies in line with *Working Together to Safeguard Children, 2023*.

Our School Standards Committee (SSC) and the DSL are familiar with the TWSP arrangements. In Telford and Wrekin, schools and colleges have been named as ‘relevant agencies’ by TWSP. We will engage with the TWSP as required and will follow the *Telford & Wrekin Threshold Guidance* or the appropriate threshold guidance for where the child resides or for who is responsible for the child, to follow the local protocol for assessments.

The SSC expects staff to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes us providing a co-ordinated offer of early help when additional needs are identified by us or another agency. We will always contribute to inter-agency plans to provide additional support to children subject to child protection plans and will never restrict access for children’s social care to conduct a section 17 or section 47 assessment.

The DSL is expected to consider the requirement for children to have an ‘appropriate adult’ when being detained or questioned by police officers. Further information can be found in the statutory guidance. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

Information sharing

We recognise that information is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting children’s welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

We expect all staff to share information with practitioners and local agencies. We are committed to sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children’s social care. Where children of the same family attend different education settings the DSL/DDSL will work with the DSLs of the other settings to ensure effective information sharing to help to identify, assess and respond to risks or concerns about the safety and welfare of children in the same family.

The security of child protection records is the responsibility of the DSL. All child protection records are clearly marked as such and are kept securely locked on the premises and/or within CPOMs or a similar secure online management system. The nominated staff members with responsibility for the security of these files are documented, identifiable and accountable within the school to ensure total security. Procedures are in place when a member of staff leaves the school or is on long term sick leave for their access to cease. Removal of child protection records from the school by staff will be noted and signed for, as will files released to professionals.

The child protection file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return.

Pupil record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidentially in line with the DfE document *Data Protection: Toolkit for schools*.

In respect of files being released when requested by the Police under [Section 29 of the Data Protection Act 2018 a form entitled 'Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6\(1\)d\)](#)' should accompany that release and a copy will be retained for our records.

We will also act in line with the guidance [Information sharing advice for safeguarding practitioners](#). If in any doubt, we will also seek advice from our Data Protection Officer. Upon releasing records, the school will request ID Badges prior to handover. If the Police are only after minimal data e.g. address or phone number, we will ensure we check the police ID and we will record what information was asked for and the name of the police officer requesting it. A permission form may not be required on these occasions.

No named statistics in relation to child protection are an important part of performance information. These may be shared by the DSL with staff, the SSC, CAT or other agencies.

In our management of information sharing we will use the following:

- Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing;
- [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information is especially useful;
- The [Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the department, and
- [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

When a child leaves the school, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible (within five working days of the child starting at their new school or college), ensuring secure transit, and confirmation of receipt will be obtained. We will transfer the child protection file separately from the main pupil file. As a receiving school, we will ensure key staff such as the DSL and SENCO are aware, as required. On receiving the child protection and safeguarding record for each child a DSL or a deputy will ensure a note is entered on to the child's child protection and safeguarding record and summarise any concerns from the information they have received. In addition to the child protection file, the DSL will share any relevant safeguarding information, including where a child is being, or has been, supported via the Channel Panel, with the new school or college in advance of a child leaving. If we are the current host school we will **not** photocopy and retain child protection records as this is deemed by the Information Commissioner's Office to contravene *The Data Protection Act 2018*, but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for ourselves for audit purposes; this would be deemed best practice.

All child protection records are reviewed annually by the DSL/DDSL. They are checked to be chronological, tidy, legible and factual in content. This should be undertaken at least annually and biannually for concerns regarding CSE, as records may sometimes be immediately required by professionals. Where reports are needed for child protection and safeguarding meetings, these should include attendance figures.

Fears about information sharing must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

We will follow the guidance on the child protection file set out in Annex C of *KCSiE, 2024*.

Opportunities to teach safeguarding

We teach safeguarding, including online safety to all pupils, endeavouring to provide a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children. We do this through Relationships and Health Education/Relationships, Sex and Health Education, having due regard to the resources signposted in *KCSiE 2024*, paragraphs 128-133 as a starting point.

We ensure that appropriate filters and monitoring systems are in place that do not lead to unreasonable restrictions in what children can be taught with regard to online teaching and safeguarding.

Online safety

We recognise that online safety is a major concern for all professionals. We believe it is essential for children to be safeguarded from potentially harmful and inappropriate online material.

Children and young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as TikTok, Facebook, Twitter, Snapchat, WhatsApp and Instagram. Online gaming with linked chat function is also popular with many young people.

Such technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use them to harm children and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through child sexual and criminal exploitation, county lines activity, radicalisation, sexual predation, child-on-child abuse, including sexual harassment and online bullying.

The aim of our approach to online safety is empowerment to protect and educate pupils and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. We will ensure appropriate filtering and monitoring on school/college devices and networks. We aim to protect children from illegal, inappropriate or harmful content, and harmful online interaction with other users. We aim for our pupils to exhibit positive personal online behaviour and recognise inappropriate online conduct. We aim to protect children from commercial risks.

The breadth of issues classified within online safety is considerable but can be categorised in four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content such as pornography, 'fake news', racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;

- **contact:** being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising, as well as adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi nudes) and/ or pornography, sharing other explicit images and online bullying;
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If we feel our pupils or staff are at risk, we will report it to the [Anti-Phishing Working Group](#).

We will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL/DSLs and any parental engagement.

We take seriously our duty to assist parents and help them with online safeguarding. As such, we make them aware of relevant support services, including those listed on pages 165-166 of *KCSiE, 2024*. Parents may also find it useful to refer to <https://www.internetmatters.org> for guidance on possible restrictions they could put in place to help keep their children safe online.

All staff receive online safety training and know to be vigilant and to report any concerns about risks to children online in the same way that they notice and report offline concerns. The school's *Online Safety Policy* explains our approach to keeping pupils safe in school and protecting and educating pupils in the safe use of technology, including ways for them to report any harmful, distressing or abusive online content, contact, conduct or commercial activity.

The school has appropriate filters and monitoring systems in place on school devices and school networks to protect children from potentially harmful online material. The DSL is directly responsible for ensuring the appropriate level of security protection procedures are in place in order to safeguard the systems, with due consideration to the cyber security standards. Where the school is alerted to unsafe online behaviour, the DSL or a Deputy DSL is always informed, the concern is rapidly evaluated and where necessary, addressed as a safeguarding issue, within appropriate timescales, dependent on the nature of the report.

Where children are being asked to learn online at home we will follow the advice to support schools to do so safely: [safeguarding in schools, colleges and other providers](#) and [safeguarding and remote education](#). We recognise the NSPCC and PSHE Association also provide helpful advice.

Through our regular communications with parents, we will reinforce the importance of children being safe online and tell parents what systems we use to filter and monitor online use. We will make parents aware of what their children are being asked to do online, including the sites we ask them to access. We will always be clear who from our school, if anyone, a child is going to be interacting with online.

In addition to the DSL, SLT members and other relevant staff, such as the Online Safety lead, will obtain an understanding of the filtering system and monitoring provisions in place and

will manage them effectively, knowing how to escalate concerns when identified. We will do this by considering the age range of our children, the number of children, how often they access the IT system and the proportionality of costs versus risks.

The appropriateness of our filters and monitoring systems have been informed in part, by the risk assessment required by the Prevent Duty. To meet this duty, in reference to the DfE [digital and technology standards](#), our school will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems;
- review filtering and monitoring provision at least annually;
- block harmful and inappropriate content without unreasonably impacting teaching and learning;
- have effective monitoring strategies in place that meet safeguarding needs.

We have the appropriate level of security protection in place, in order to safeguard our systems, staff and learners and we will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We will carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face.

The School Standards Committee (SSC) and proprietors will review the standards and the DSL will discuss with IT staff and service providers what more needs to be done to support the school in meeting this standard. Our SSC will question school leaders to gain a basic understanding of our approach to keeping children safe online, learning how to improve this approach, where appropriate.

Mentors of trainee teachers and Early Career Teachers induct mentees and provide ongoing support, development and monitoring of online safety practices.

Safe use of electronic devices

The school is unable to filter activity on devices not owned by the school and recognises that when children have unlimited and unrestricted access to the internet (i.e. via 3G, 4G and 5G), it is likely that some will misuse this to bully, sexually harass, threaten or control their peers via their mobile and smart technology; share nude or semi-nude images and/or videos consensually and non-consensually, including via large chat groups; request/pressurise other pupils to create and share nude or semi-nude images and/or videos; and view or share pornography and other harmful content.

Staff are trained to assume and anticipate such misuse and to take action where they have reason to believe that this is happening or has happened, reaching out to pupils identified as being at risk, reporting incidents to the DSL as with all other safeguarding issues and confiscating devices that they suspect may contain evidence of illegal or harmful content or activity.

Online bullying, online sexual harassment and non-consensual sharing of nude and semi-nude images and/or videos are treated as seriously as any other type of bullying or sexual harassment and are managed through our anti-bullying and child-on-child abuse procedures.

Staff use of personal electronic devices is restricted within this school and must not ordinarily be accessed when in the presence of children, without SLT permission.

Therefore, we will ensure that:

- personal electronic devices are kept in a secure place and not accessible throughout contact time with the pupils;
- photographs or images of any children within our care are only taken following parental consent and only by using a school device and that those images remain within the setting;
- when on outings, electronic devices are only used to make or receive phone calls relating directly to ensuring the safety and well-being of the children.

We follow the good practice guidance from the Information Commissioners Office, on [taking photographs in educational institutions](#). In the interests of safeguarding, a common-sense approach on a case-by-case basis will be taken in this area.

The use of ‘reasonable force’

There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom.

We will always follow the DfE advice for schools on the use of [Reasonable Force in Schools](#). We will also have regard to additional guidance [Reducing the Need for Restraint and Restrictive Intervention](#) for children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties.

We believe that the adoption of a ‘no contact’ policy at our school could leave staff unable to fully support and protect our pupils. We will adopt a sensible approach allowing staff to make appropriate physical contact. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEND, mental health concerns or with medical conditions, we will consider the risks carefully because we recognise the additional vulnerability of these groups. We will consider our duties under the *Equality Act 2010* in relation to making reasonable adjustments, non-discrimination and our *Public Sector Equality Duty*.

We will plan positive and proactive behaviour support. For instance, through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force. We will only use reasonable force where de-escalation processes have failed.

Hiring out our facilities and/or premises

Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by us, under our own direct supervision or management, our own arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. We will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place including inspecting these; we will ensure that there are arrangements in place to liaise with us on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises and that failure to comply with this may lead to termination of the agreement.

The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

In any event where we feel there is reputational risk to our organisation, we will withdraw from any hire agreement of our premises. We will ensure the hirer acknowledges that our school has a duty under Section 26 of the Counter Terrorism and Security Act 2015 in the exercise of its functions to have “due regard to the need to prevent people from being drawn into terrorism” (the “Prevent Duty”). We will ensure the hirer uses our premises in such a way as to satisfy the Prevent Duty and will take all reasonable steps to ensure our premises are not used by any groups or speakers in support of any extremist ideology.

Children Absent from or Missing from Education (CME)

All children, regardless of their circumstances, are legally entitled to an efficient, full-time education which is suitable to their age, ability and any special educational needs they may have.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines, radicalisation or mental health issues. It is important the school’s response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging, but also where children are already known to Children’s Social Care and need a social worker (such as a child in need or one who has a child protection plan or is a child in care), where being absent from education may increase known safeguarding risks within the family or in the community.

The recognised figure for severe absence is 50% attendance or less and persistent absence is having less than 90% attendance, although concerns may still be raised if above this.

As part of induction and annual training, staff will be made aware of the school’s unauthorised absence and children missing from education procedures. In line with the statutory guidance *Children missing education*, we will require the behaviour and attendance lead to refer to and use the established protocol document of notification to the Local Authority, filling out the appropriate paperwork, policies and procedures for identifying pupils who are absent from education and policies and procedures for pupils on a modified timetable (available from Telford & Wrekin Council).

Due to the safeguarding risks associated with regular absence, we aim to reduce the number of pupils accessing a modified timetable. We will ensure any pupils accessing a modified timetable are seen regularly by school staff to help ensure their safety and welfare. It is our

aim that pupils access modified timetables for limited periods of time and children on a child protection/child in need plan and/or have an Education Health Care Plan are not placed on a modified timetable. We will regularly monitor and review the use of modified timetables.

In addition to the above, we will endeavour to hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give us additional options to make contact with a responsible adult when a child is absent from education and poses a potential welfare/safeguarding concern. Where a child on a Child Protection Plan has been missing from school for two consecutive days, we will notify the child's allocated social worker and in some cases may do so before this time.

Where children leave the classroom or leave our grounds without permission, this is covered within our behaviour policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5); 'Anyone who has care of a child without parental responsibility may do what is "reasonable" in all the circumstances to safeguard and promote the child's welfare. It is likely to be "reasonable" to inform the police, or children's services departments, and, if appropriate, their parents, of the child/young person's safety and whereabouts'.

However, in principle, if a pupil runs out of class we will establish where he or she has gone. Staff will not ordinarily run after them, unless they are at immediate risk in not doing so, but will seek additional support. It is advisable to keep a watchful eye on any children who has taken themselves out of our building and possibly out of our grounds, unless this watchful eye provokes the child to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a child is no longer on the premises, we will contact parents in the first instance. If they are not contactable, we will inform the police that a pupil has left and is at risk.

Where children have gone missing, including leaving the school without permission, we will follow the [West Mercia Pathway for Children who go Missing from Home, Care or Education](#).

We always deem it appropriate to report pupils who go missing from school to the police and children's services where we cannot locate the child quickly.

Elective Home Education (EHE)

We understand that many home-educated children have a positive learning experience. We would expect that any parent's decision to home educate to be made with their child's best educational interests at the heart of the decision. However, we know that this is not the case for all; home education can mean that some children are not in receipt of a suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs.

In line with legislation, we inform Telford & Wrekin Council of all deletions from our admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will facilitate a meeting with the local authority education team, ourselves, other relevant schools, other key professionals and, where possible, parents/carers. Ideally, this will be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The school will invite the local authority education team by emailing ehe@telford.gov.uk.

Where parents intend to electively home educate their child/ren we will work with the local authority EHE team to consider, plan for and ensure ongoing support for the child's safeguarding and welfare needs at the point they become electively home educated.

We understand it is our responsibility to identify the parents or carers with whom we need to meet to discuss EHE before they make their final decision. We will record if parents refuse to attend this meeting. If parents decline this meeting, we will still meet with the local authority.

We will follow the Telford and Wrekin Council [EHE pathway](#).

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact that a child has a social worker and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this information will be used by the DSL (or deputies) to inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children requiring mental health support

We recognise that we have an important role to play in supporting the mental health and well-being of our pupils.

Mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The SSC have put clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

We will help prevent mental health concerns by promoting resilience as part of our integrated whole school approach to social and emotional well-being which is tailored to the needs of our pupils.

Our school has a Strategic Mental Health Lead who is a senior member of staff. The Mental Health Lead ensures that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. As part of Community Academies Trust, we adhere to the Trust-wide guarantee of universal, targeted and specialised mental health provision minimum offers, details of which can be viewed on our website. Contact details of our Strategic Mental Health Lead can be found in Appendix 3.¹⁴

¹⁴ See also 'Mental Health' section above.

Suicide Intervention

We accept and understand that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. We work with our pupils and in partnership with external agencies to support anyone in our school community that may have thoughts of suicide, making those in our care as safe as is possible. We will also make staff aware of the following useful link in raising awareness of the subject: [Zero Suicide Alliance](#)

Looked After Children and Previously Looked After Children

We recognise that the most common reason for children becoming looked after is as a result of abuse and/or neglect. All staff in our school have the knowledge and skills to keep looked after children safe. The DSL will hold details of each child's social worker and the name and contact details of the virtual school head in the Local Authority that looks after the child. They are responsible for championing the educational attendance, attainment and progress of children in kinship care and for ensuring that all staff have the information they need in relation to a child's looked after status and the child's contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

We understand that previously looked after children potentially remain vulnerable and therefore ensure that staff similarly have the necessary knowledge, skills and understanding to keep these children safe. When dealing with looked after children and previously looked after children we will work with all agencies to take prompt action where necessary to safeguard them.

The Designated Teacher for Looked After and Previously Looked After Children

The SSC has appointed a designated teacher to work with the local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the *Children and Social Work Act 2017*, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher has appropriate training and relevant qualifications and experiences to fulfil this role.

We follow the statutory guidance on [The Roles and Responsibilities of the Designated Teacher](#).

Virtual School Heads

The designated teacher works with the virtual school head to discuss how funding can be best used to support the progress of children who are looked after in the school and meet the needs identified in the child's personal education plan (PEP). The designated teacher also works with the virtual school head to promote the educational achievement of previously looked after children.

The Virtual School Head's strategic role also includes:

- Raising the visibility of the distinct needs of children in different types of kinship care arrangements and the disadvantage that they can experience;
- Promoting practice that supports attendance and engagement in education;

- Promoting practice that improves children in kinship care's outcomes to narrow the attainment gap, so that every child has the opportunity to reach their full potential.

We follow the statutory guidance on [Promoting the Education of Looked After Children](#).

The DSL, Headteacher, SENCO, senior mental health lead and governors will work with the virtual school head to promote educational attendance, attainment and progress of children with a social worker.

The virtual school head for Telford and Wrekin is **Michelle Salter**.

Care Leavers

The DSL understands the ongoing responsibilities of local authorities to the young people who cease to be looked after and become care leavers. The DSL will hold details of the local authority Personal Advisor appointed to guide and support the care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

Children who have Special Educational Needs and/or Disabilities (SEND) or Physical Health Issues

We recognise that children who have SEND or certain health conditions can face additional safeguarding challenges. We accept the additional barriers that can exist when recognising abuse and neglect of children in the group. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To help address these additional challenges we will provide extra pastoral support for children with SEND. For any reports of abuse involving children with SEND, the DSL or a Deputy and the SENCO will liaise closely.

Children who are lesbian, gay, bisexual or gender questioning¹⁵

We recognise that a child or a young person being lesbian gay or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian gay or bisexual (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When

¹⁵ This section of our policy remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

When supporting a gender questioning child, we will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children who are lesbian gay or bisexual lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Staff

All staff members, including supply teachers, contractors, volunteers and visitors are informed of the name of the DSL and deputies and the school's procedures for protecting children. For example, how to report their concerns or suspicions and how to receive, record and report disclosures.

Staff should not accept personal invitations to visit the homes of children unless permission or instruction has been sought from the Headteacher or DSL and it is viewed as a professional appointment. For example, supporting education welfare issues etc. This should be viewed on a case-by-case basis. To support this, guidance from the DfE (September 2010) states 'Meetings with pupils away from the school premises should only be arranged with the specified approval of the headteacher and the prior permission of the pupil in question'. We accept this guidance from the DfE, stating that in the case of private meetings: 'Staff and volunteers should be aware that private meetings with individual pupils could give cause for concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another pupil or adult should be present or nearby. Where conditions cannot apply, staff should ensure that another adult knows that the interview is taking place'.

Parents

Parents play an important role in protecting their children from abuse. All schools are required to consider the safety of the child and should a concern arise, professional advice may be sought prior to contacting parents. If deemed appropriate, parents will be contacted, and the school will continue to work with them to support the needs of their child. Consent from the parents will be sought, although in exceptional circumstances and with the best interests of the child being considered, this may be overridden.

We aim to help parents understand their responsibility for the welfare of all children, which includes their duty to refer cases to social care services and/or police in the interests of the child. The SSC will include a child protection statement in our school prospectus and all parents can view a copy of this policy.

Parents who have concerns regarding a member of staff can in the first instance raise those with the Headteacher. This may involve the school then sharing those concerns with relevant agencies. Where the parent has concerns regarding the Headteacher, the chair of the SSC should be consulted in the first instance.

Parents can liaise with Ofsted on such conduct issues or regulatory concerns. Advice can be found on its website www.ofsted.gov.uk.

On occasions, Ofsted may forward complaints that potentially raise a safeguarding concern about our school via Family Connect. In such instances we will work with all agencies within Family Connect to clearly respond to Ofsted on a case-by-case basis.

Parents/carers can also access Ofsted [Parent View](#) which is an online survey questionnaire where parents can give their views. Where possible, this will be monitored regularly by the school to quickly address any concerns.

All complaints should be made via our school complaints procedures.

We will keep parents informed of all areas of safeguarding and child protection through the regular methods of communication.

We wish to make it clear to parents the standards, behaviour and respect we expect from them and conversely, they from us. If a parent's behaviour is a cause for concern, then we will ask them to leave the school premises. We wish to make it clear that in serious cases, the Headteacher may notify parents in writing that their implied licence to be on the school premises is temporarily revoked, subject to any representations that the parent may wish to make. This school will give parents the opportunity to formally express their views on the decision to bar in writing and this will be reviewed via the complaints policy.

Schools are private places. We will therefore act to ensure they remain a safe place for all. The public, including parents, has no automatic right of entry.

Our school expects parents to talk to us about any concerns they have regarding the care and education provided by us in the first instance. We urge all parents not to express these concerns on social media platforms, at least not before sharing these concerns with us first.

Changing in School

We consider arrangements for safe changing of children for physical education (PE). We will be guided by the NSPCC guidance [Safeguarding considerations for changing rooms](#). This consideration will come under our duty and remit of health & safety and in the context of children's welfare. We follow the guidance and do what we need to do in relation to organising changing facilities for children; staff supervision; changing areas for children with additional needs; changing considerations for drama productions and using off-site changing rooms.

7. Safer School Culture

Safer Recruitment

The school will meet all requirements as set out in *Keeping Children Safe in Education, 2024*, Part three: Safer recruitment.

The school is supported by CAT's Director of Safeguarding and Behaviour and its Human Resources team, who are available to advise on the management of safer recruitment procedures.

We are committed to creating a culture of safer recruitment and, as part of this, we adopt robust recruitment procedures that help deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in our school.

This school maintains a single central record of pre-appointment checks. As we are part of Community Academy Trust, the Trust will maintain the section of the single central record detailing checks carried out regarding Academy Directors and Trustees, though this information is available upon request to all schools in the trust.

Appropriate accredited training in safer recruitment has been completed by members of SLT and others who are involved in recruitment. The school ensures that there is always at least one such trained colleague involved in all staff / volunteer recruitment processes and sitting on the interview panel. At least one member of the SSC will have also completed Safer Recruitment training.

Pre-appointment vetting checks, regulated activity and recording information

We will abide by the legal requirements when appointing individuals to engage in regulated activity relating to children. We understand the importance of ensuring the correct pre-appointment checks are carried out. These checks will help us to identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). We see this as part of our wider safeguarding regime which will carry on following appointment.

Other checks that may be necessary for staff, volunteers and others

We will carry out the checks that are necessary for individuals who have lived or worked outside the UK; agency and third-party staff; contractors; trainee teachers; volunteers; governors and proprietors. We will fulfil our responsibilities in relation to other settings, including alternative provision, work experience and host families.

Visitors

We have different types of visitors: those with a professional role, those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity.

We do not request DBS checks and barred list checks, or ask to see existing DBS certificates for visitors, such as children's relatives or those attending an in-school event. The headteacher will use their professional judgement to determine the need to escort or supervise such visitors.

For visitors who attend our school in a professional capacity, we will check their ID and seek assurance that they have had the appropriate DBS check (or that their employers have confirmed that their staff have appropriate checks). We will not ask to see DBS certificates.

A record of visitors is maintained and all visitors are easily identified by a visitor's lanyard or badge.

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help us enrich children's education, careful consideration will be given to the suitability of any external organisations.

Alternative provision

For any children we place in external alternative provision, we continue to be responsible for the safeguarding of that pupil and will undertake checks to ensure that the provider meets the needs of the pupil.

We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

Adults who supervise children on work experience¹⁶

When organising work experience placements we will ensure that the placement provider has policies and procedures in place to protect children from harm.

We will ensure that, where relevant, checks, including barred list checks, have been obtained for people who supervise any children under the age of 16 on a work experience placement. We will consider the specific circumstances of the work experience and give consideration in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves, and
- providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, we may ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

We are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience. If an activity undertaken by a child on work experience takes place in a 'specified place', such as a school or sixth form college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity relating to children.

Children staying with host families (homestay)

If the school arranges a homestay, we will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

We will always consider what intelligence/information will best inform our assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. We will use our professional judgement to decide what will be relevant.

To help inform our assessment, we will obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed, it will also allow us to consider, alongside all other intelligence that we have obtained, whether the adults would be a suitable host for a child. We will also decide whether it is necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

¹⁶ Secondary schools only

Host families - homestay during exchange visits

This school has a duty to safeguard and promote children's welfare. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school arranges, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

We will follow the guidance set out in Annex E of *KCSiE, 2024* with regarding to arranging a homestay - suitability of adults in UK host families, homestay - suitability of adults in host families abroad and the additional action for extended homestays.

We will always ensure pupils understand who to contact during a homestay should an emergency occur or a situation arise which makes them feel uncomfortable.

Private fostering

Private fostering occurs when a child under the age of 16, or under 18 if the child is disabled, is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When the school becomes aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, we will encourage parents and private foster carers to notify them and will share information with Children's Social Care as appropriate.

Our ongoing safeguarding of children and the legal reporting duties on us

We understand the importance of safeguarding vigilance beyond the recruitment process.

We believe safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from our whole community to ensure the safety and welfare of children is embedded in all our processes and procedures, and consequentially enshrined in our ethos.

We aim to promote continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

We aim to create the right culture and environment so that our staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children. This can help assist us as employers to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in our care.

We will undertake our duty to refer to the *Disclosure and Barring Service* and to the *Teaching Regulation Agency* where required.

Appendix 1 - Additional School Specific Safeguarding Information and Procedures

Safeguarding in School

Windmill Primary School uses CPOMS (Child Protection Online Management System) to record all events that cause staff concern. All staff have access to the system and are trained in school how to complete a CPOMS log. Any new staff joining the school receive training on CPOMS as part of their induction. Concerns about children are initially logged as a 'Pastoral Concern', which alerts DSLs (Designated Safeguarding Leads) who will carry out triage to determine if there is a serious and immediate threat to a child's wellbeing, in which case this will be recategorized as a 'Safeguarding Concern' and dealt with urgently. If a member of staff has a serious and immediate concern, they will speak to a DSL as soon as possible. Incidents are monitored by the DSLs to identify patterns that may indicate issues over time. This happens in weekly DSL meetings. At those meetings, all DSLs discuss current safeguarding concerns, identifying any actions needed for the week ahead. Safeguarding is reported to school governors on a half-termly basis.

Yellow forms remain in place for the reporting of any concerns about staff, including low-level concerns. DSLs are clear that any allegations against staff that constitute abusive behaviour towards children must be reported to the LADO (Local Authority Designated Officer) at Telford and Wrekin Council. Staff also have access to the CAT and Telford & Wrekin Council's Whistleblowing Policies, displayed in the staff room.

Training

All staff are given annual updates on safeguarding matters, and we ensure that key safeguarding messages are reiterated at the beginning of every academic year. Regular in-school safeguarding training is delivered by the DSLs and any members of staff who join the school within the academic year receives comprehensive safeguarding training as part of their induction.

DSLs attend DSL updates each year which are delivered by Telford and Wrekin Council's Safeguarding Board, which also includes the local and national arrangements for safeguarding in school. DSLs all access refresher training every three years. DSLs have also completed training from Brook which focuses on sexualised behaviours, and how to recognise and support children. We have received training from St. Giles Trust about County Lines. Teaching staff also have access to online training to further enhance their safeguarding knowledge. Safeguarding is a standing item on each staff meeting agenda, which includes opportunities to refresh training or review procedures.

All safeguarding training is logged centrally and stored with the Business Manager.

Building Safety

The safety of pupils and staff on site is paramount. Gates are locked at 9am and remain closed during the day, minimising access of the public to school grounds. After this time, our families will enter via the main gate and contact the school office through the gate intercom and someone will let them in remotely. CCTV is displayed live in the school office and families can be monitored from this point. When gates

are open, there is a DSL on duty (usually the Headteacher) who is accessible on both playgrounds. All visitors must report to the school office where they are signed in and receive a copy of our safeguarding booklet. Any visitor without a valid DBS will be escorted by a member of staff until leaving the site. We encourage all our pupils to challenge our staff and visitors to school if an official school badge is not obvious to them. All staff are trained to challenge any visitor not wearing a badge.

Online Safety

The school has a filtering system managed by Telford and Wrekin Council ICT services. Our systems have SENSO monitoring software which alerts DSLs of potential violations on school computers and other devices. All school laptops have an individual login and password. All adults in school read the Acceptable Use Policy and sign to say they have understood this, and this is reviewed on an annual basis. The Acceptable Use Policy is discussed as part of the new staff induction process.

All pupils are taught about age-appropriate aspects of online safety as part of the planned PSHE and Computing curricula. Principles are reinforced every time the children are using devices. Pupils are taught how to report if they feel unsafe online. Additional lessons may be planned in the event of incidents arising throughout the academic year. There is a section on the school website that families can access:

<http://www.windmillprimaryschool.co.uk/keeping-children-safe/online-safety>

Curriculum

Pupils at Windmill are taught about aspects of personal safety through Protective Behaviours, RSE and assemblies. For RSE, Windmill Primary School uses the Jigsaw Curriculum.

Children gain an understanding of what it means to be safe and what they can do if they feel unsafe. Relationships and work on emotions form an important part of the work undertaken at Windmill Primary School. The school has a dedicated team of staff who support in school which is managed by the Assistant Headteachers. Within this team, our setting has a dedicated ELS (Emotional Literacy Support) Coordinator who organises appropriate interventions for some of our children and a Welfare Lead who supports our families in areas such as Early Help Assessment. We encourage all our pupils to talk about and reflect on how they are feeling and are taught strategies for managing them. There are Zones of Regulation throughout the school, so pupils can indicate how they are feeling and will allow further follow-up with staff if needed.

As part of the wider curriculum, Year 6 pupils access the STAR Programme (STOP THINK ACT REFLECT) which includes a focus on drug awareness and the confidence to SAY NO! Year 6 pupils also attend Crucial Crew which is a multi-agency event organised through schools, by the police, fire service and other agencies. The aim is to raise awareness of safety issues among school children in Year 6 (aged 10-11). The event takes the form of a range of 20-minute interactive scenarios which cover a wide range of topics, each educating the students about a specific risk.

Scenarios include:

- Water Safety
- Discovering a fire

- Healthy Child
- Internet Safety
- Drugs and Alcohol Awareness
- Anti-social Behaviour

Through the focus on relationships, staff know the pupils well and this all starts with a Welcome Week that takes place at the start of every academic year. Pupils can choose what clothes they wear during these days, and staff get to know them through activities such as sitting around a fire, den building and bespoke P.E. sessions. The staff know which pupils are particularly vulnerable and are quick to identify when something does not seem right. These concerns are always logged on CPOMS and those pupils identified are signposted through an ELSA referral or a referral to the Welfare Lead where needed. Some children need increased support in the short term, whilst others require more systematic and longer-term support.

Nurture

Staff are trained to provide appropriate support and can access further professional support if it is needed.

Examples of support in school include:

- Emotional Literacy Support Assistants
- Wellbeing: You're a Star, The Colour Monster, Don't Worry Be Happy, The Unworry Book
- Social Skills: Talkabout for Children
- Anger Management: Anger Management Skills Workbook for Kids, My Hidden Chimp, Volcano in my Tummy
- Consent and Boundaries: Let's talk about Body Boundaries, Consent and Respect, Personal Space Camp

Examples of external support include:

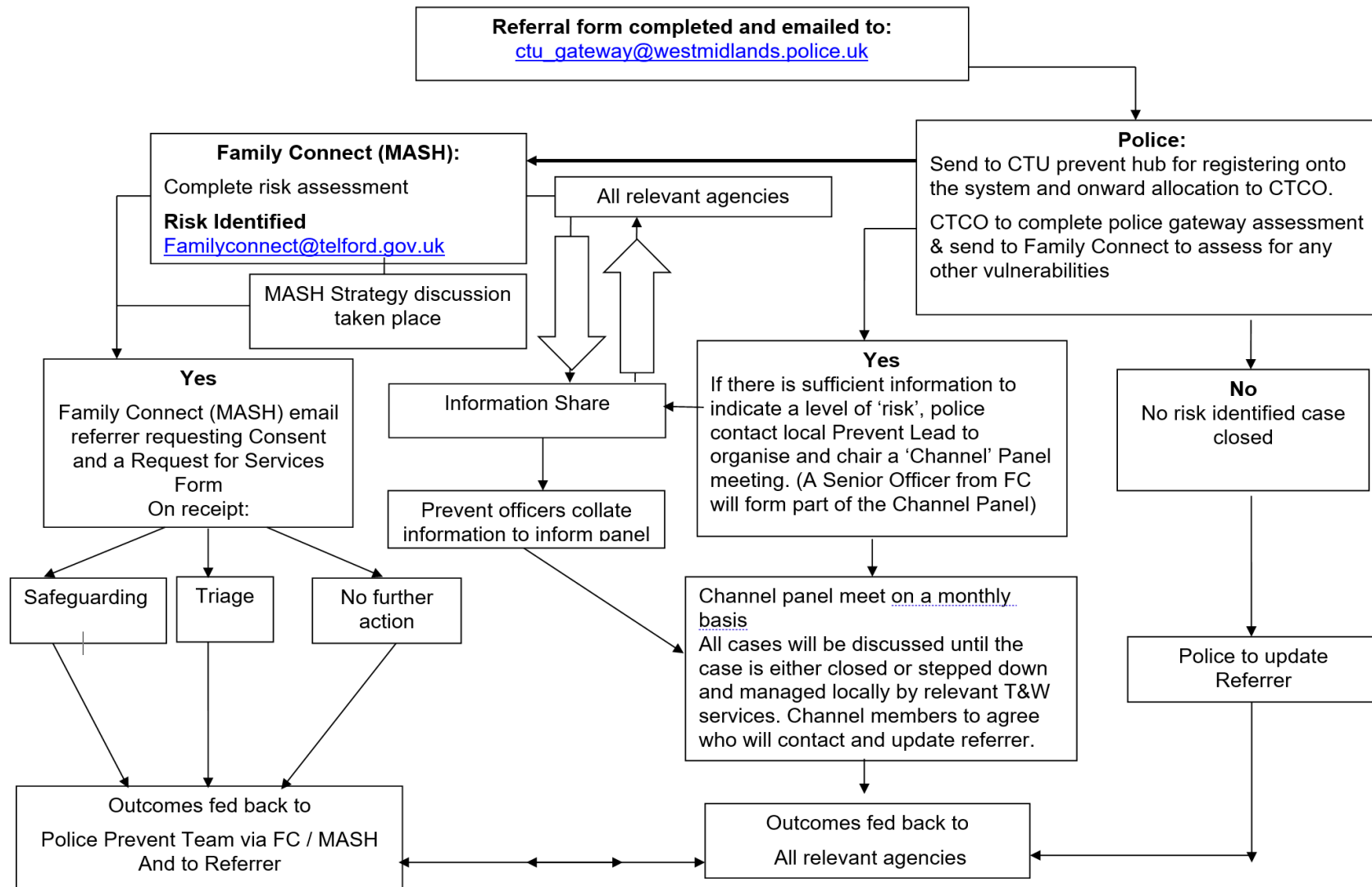
- Counselling
- BEAM
- Trailblazer project (non-acute mental health support)
- School Nursing team
- BeeU (CAMHS)

Through funding from the Department for Education, the welfare lead organises holiday activities for vulnerable pupils which have included trips to see a pantomime, trips to the beach and a summer camp residential.

On-site provider - Chipmunks

There is a private day nursery on site at Windmill that also provides wraparound care. They are a separate entity to school but share the same gates, access to Chipmunks is via their own intercom system. Chipmunks have their own DSL and safeguarding arrangements and there is a telephone link between school and nursery. In the event of a safeguarding emergency on site that requires lockdown or a fire evacuation, the telephone link will be used to notify the other setting.

Appendix 2 - Telford and Wrekin Prevent Pathway



Family Connect (MASH) will discuss with Police HAU to support the completion of a risk assessment at the earliest opportunity.

If referral is adult led and children are identified as being present / resident within the family home, the referral form will be shared with Family Connect along with all supporting evidence.

Safeguarding, Triage and No further action are key outcomes following the completion of *Request for services form*.

Agreed outcomes will be shared between Family Connect and the Police.

Appendix 3 - Key Safeguarding Personnel in Schools

Key personnel in Grange Park Primary School

Role	Name	Contact details
Headteacher	Richard Thorpe	email: richard.thorpe@taw.org.uk tel: 01952 387490
The Designated Safeguarding Lead (DSL)	Zoe Meredith	email: zoe.meredith@taw.org.uk tel: 01952 387470
Deputy Designated Safeguarding Lead (DDSL)	Rebecca Marshall	email: rebecca.marshall@taw.org.uk tel: 01952 380906
Other staff members trained to undertake the functions of the Designated Safeguarding Lead	Richard Thorpe Ian Lambie Gail Rance	email: richard.thorpe@taw.org.uk , ian.lambie@taw.org.uk Gail.Rance@taw.org.uk tel: 01952 387490
Mental Health Lead	Jemma Roberts	email: jemma.roberts@taw.org.uk tel: 01952 387470
Designated Teacher for Looked After and Previously Looked After Children	Zoe Meredith	email: zoe.meredith@taw.org.uk tel: 01952 387470
Nominated Safeguarding Governor	Marc Clarke	email: marc.clarke@taw.org.uk tel: 01952 387490
Chair of School Standards Committee	Carl Bowman	email: carl.bowman@taw.org.uk tel: 01952 387490

Key personnel in Telford Langley School

Role	Name	Contact details
Headteacher	Emma Blount	email: Emma.Blount@taw.org.uk tel: 01952 386700
The Designated Safeguarding Lead (DSL)	Kevin Preece	email: Kevin.Preece@taw.org.uk tel: 01952 386700
Deputy Designated Safeguarding Lead (DDSL)	Katie Shewring	email: Katie.Shewring1@taw.org.uk tel: 01952 386700
Other staff members trained to undertake the functions of the Designated Safeguarding Lead	Kylie Evison Lucy Evans Kelly Thomas Donna Smith	email: Kylie.Evison1@taw.org.uk Lucy.Evans1@taw.org.uk Kelly.Thomas4@taw.org.uk Donna.Smith1@taw.org.uk tel: 01952 386700
Mental Health Lead	Kevin Preece	email: Kevin.Preece@taw.org.uk tel: 01952 386700
Designated Teacher for Looked After and Previously Looked After Children	Lucy Evans	email: Lucy.Evans1@taw.org.uk tel: 01952 386700
Nominated Safeguarding Governor	Steve Kelly	email: langley.clerk@taw.org.uk tel: 01952 386700
Chair of School Standards Committee	Sami Mirza	email: langley.clerk@taw.org.uk tel: 01952 386700

Key personnel in Windmill Primary School

Role	Name	Contact details
Headteacher	Mark Gibbons	email: mark.gibbons@taw.org.uk tel: 01952 386360
The Designated Safeguarding Lead (DSL)	Mark Gibbons	email: mark.gibbons@taw.org.uk tel: 01952 386360
Deputy Designated Safeguarding Lead (DDSL)	Kizzie Coles	email: Kizzie.coles@taw.org.uk tel: 01952 386360
Other staff members trained to undertake the functions of the Designated Safeguarding Lead	Melanie Dexter Kelly Peart	email: Melanie.dexter@taw.org.uk Kelly.peart@taw.org.uk tel: 01952 386360
Mental Health Lead	Debbie Cambidge	email: debbie.cambidge@taw.org.uk tel: 01952 386360
Designated Teacher for Looked After and Previously Looked After Children	Debbie Cambidge	email: debbie.cambidge@taw.org.uk tel: 01952 386360
Nominated Safeguarding Governor	Jenny Edge	email: jenny.edge@taw.org.uk tel: 01952 386360
Chair of School Standards Committee	Alison Lamputt	email: alison.lamputt@taw.org.uk tel: 01952 386360