Low Hill Nursery School

Safeguarding & Child Protection Policy

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Contents

1. Safeguarding definition
2. Legislation & supporting documents and guidance
3. Related policies
4. Aims and purpose
5. Management of Safeguarding (Role of Governing Body)
6. Roles and responsibilities of staff
7. Confidentiality and information sharing
8. Communication with parents
9. Advice on what to do if a child discloses
10. Recording and reporting procedures
11. Support before statutory intervention
12. Making a referral to social care
13. Voice of the child
14. Record keeping
15. Staff safeguarding training, including induction
16. Safer working practices
17. Safer recruitment
18. Safeguarding concerns and allegations made against staff
19. Whistleblowing
20. Safeguarding Curriculum and Online Safety
21. Preventing Radicalisation (Prevent)
22. Cybercrime
23. Children potentially at greater risk of harm
24. Types and indicators of abuse and neglect
25. Safeguarding Issues (Contextual)
26. Child criminal exploitation (CCE) and child sexual exploitation (CSE)
27. Child on child abuse (including sexual harassment and violence)
28. Domestic abuse
29. Children absent from education
30. Private fostering
31. Honour or faith-based abuse (including female genital mutilation and forced marriage)
32. Serious violence
33. Children in the court system
34. Children with family members in prison or in custody
35. Homelessness
36. Modern slavery and the National referral mechanism
37. Child abduction and community safety issues
38. Monitoring policy and procedures

1. Safeguarding Definition

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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
- taking action to enable all children to have the best outcomes.

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

Safeguarding is what we do for all children and young people to keep them safe whilst in our care. Child protection describes the policy and procedures specifically for those young people who are at risk of harm or have been harmed.

Our school is committed to safeguarding children and young people, and we expect everyone who works in or visits our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that may worry them.

Victims and alleged perpetrator(s)

For the purposes of this policy, we, in places, use the term 'victim'. It is a widely recognised and understood term. It is important that we recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, we will be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

For this policy, we, in places, use the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. These are widely used and recognised; however, we will think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

Nudes and semi-nudes, including where generated by AI

For the purposes of this policy, the term **'making or sharing nudes and semi-nudes'** refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term **'images'** includes all visual content, such as photographs, videos and livestreams.

We use the term **'nudes'** because it is the most widely understood by children and young people and best captures the full range of image-sharing behaviours covered in this guidance.

Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

2. Legislation and Guidance

The Governing Body of Low Hill Nursery School recognises and is committed to fulfilling its statutory responsibility to safeguard and promote the welfare of children in accordance with the following legislation and guidance:

- The Education Act 2002 (section 175/157)
- Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools to plan to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.
- Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are pupils at the school.
- The Education (independent School Standards) Regulations 2014
- The non-maintained Special schools (England) Regulations 2015
- Wolverhampton multi-agency safeguarding arrangements - Wolverhampton Safeguarding Together
- Multi-Agency Wolverhampton Safeguarding Together Threshold of Need and Support 2026
- Working Together to Safeguard Children (March 2026)
- Keeping Children Safe in Education (September 2026)
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents, and carers (September 2026)
- Data (Use and Access) Act 2025
- What to do if you are worried a child is being abused (March 2015)
- Sections 26 & 29 of the Counterterrorism and Security Act 2015
- Prevent Duty Guidance – England and Wales (December 2023)
- Working together to improve school attendance (August 2024)
- Section 5B of the Female Genital Mutilation Act 2003
- Children Act 1989 & 2004
- Disqualification under the Childcare Act 2006 (July 2018 Regulations)
- Section 3 - Early Years Foundation Stage (EYFS) statutory framework

3. Related Policies

Our policy relates to safeguarding and child protection concerns and sits within a suite of other safeguarding policies. Our policy applies to all staff (teaching and non-teaching), governors and volunteers, trainee teachers, temporary and supply staff working in our school. It will be reviewed at least annually by the governing body, and is in line with our local safeguarding procedures, the expectations of the Department for Education and Ofsted which inspects schools' safeguarding arrangements.

Other policies that may be referred to within this policy include:

- Attendance and Punctuality
- Admissions
- Anti-bullying
- Educational Visits
- Code of Conduct
- Safer Recruitment
- Behaviour Policy (Including restrictive intervention and use of reasonable force)
- Management of Allegations
- Online Safety
- Whistleblowing

4.Aims and purpose

- To provide Staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across our school.
- To demonstrate our commitment to protecting and supporting our vulnerable children, children who need support through early help, family help, children in need and children who have a child protection plan.

Principles and values

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We understand that safeguarding and promoting the welfare of children is everyone's responsibility and everyone who encounters our children and families has a role to play in identifying concerns, sharing information, and taking prompt action at the earliest opportunity.

We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.

We maintain an attitude of "it could happen here" where safeguarding is concerned.

We will adopt a 'child-centred' approach to safeguarding and child protection, and we will act in the 'best interests' of our children.

We ensure that everyone is aware of their safeguarding responsibilities.

We provide all staff, supply staff, trainee teachers, volunteers and governors with the framework, training and support they need to keep children safe and secure in our school and we inform parents and carers how we will safeguard their children whilst they are in our care.

5. Management of Safeguarding (Role of Governing Body)

Our Chair of Governors is Paige Garbett

Our Safeguarding Link Governor is Paige Garbett

Our governing body have a strategic leadership responsibility for the safeguarding arrangements and will ensure they comply with their duties under legislation, they will have regard to 'Keeping children safe in education' to ensure that the policies, procedures, and training in our school are effective and always comply with the law. They will ensure that this safeguarding and child-protection policy covers all sections in KCSIE 2026.

Our governing body will ensure that they facilitate a whole school approach to safeguarding. This will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. They will ensure that all systems, processes, and policies operate with the best interests of the child at their heart.

Our governing body will ensure that a senior leader (or equivalent) is responsible for our school's safeguarding arrangements, including filtering and monitoring systems for online safety. This role will be included in the appointed DSL's job description.

Our governing body will ensure that those staff who work directly with children read **at least Part one of KCSIE**.

Our governing body, working with the senior leadership team and the designated safeguarding lead, will ensure that those staff who do not work directly with children **read Part one of KCSIE.**
Our governing body will ensure that mechanisms are in place to assist staff to understand and discharge their roles and responsibilities as set out in Part one of KCSIE.

Our governing body will ensure that our school contributes to multi-agency working in line with statutory Working Together to Safeguard Children guidance.

Our governing body recognise the importance of information sharing between practitioners and local agencies. They will ensure that we have arrangements in place that set out clearly the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

Our governing body will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the data protection laws. Our governing body understand that the data protection laws do not prevent the sharing of information for the purposes of keeping children safe. **Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.**

Our governing body will ensure that, as part of the requirement for all staff to undergo regular updated safeguarding training, including in relation to online safety, it is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

Our governing body will ensure that children are taught about how to keep themselves and others safe, including online. Education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND). Relevant topics will be included within Relationships and Health Education (for all primary pupils), and

Relationships, Sex and Health Education (for all secondary pupils). In teaching these subjects, our school will have regard to the statutory guidance.

Our governing body will do all that they reasonably can to limit children's exposure to all the risks from the school IT system. As part of this process, they will ensure our school has appropriate filtering and monitoring systems in place and regularly review their effectiveness at least once every academic year. Reviews will be carried out by the SLT member responsible for filtering and monitoring in our school, with the support of our DSL and IT support. They will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks The Department for Education's filtering and monitoring standards will be considered when reviewing systems.

Our governing body will take measures to protect children's personal information by ensuring our school has appropriate cyber security systems in place.

Our Governing body will ensure there are procedures in place to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (Low-Level concerns), about staff members (including supply staff, trainee teachers, volunteers, and contractors). They will ensure procedures are in place to 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.

Our governing body will ensure that our school adopts a sensible policy for restrictive interventions, including use of reasonable force, which allow and support our staff to make appropriate physical contact. **Our school does not adopt a 'no contact' policy** The decision on whether to use 'reasonable force' to control or restrain a child is down to the professional judgement of our staff concerned within the context of the law and should always depend on individual circumstances. When using 'reasonable force' in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, we will when considering the risks carefully, recognise the additional vulnerability of these groups.

Our governing body will ensure there is an appointed designated teacher who should work with local authorities and Virtual Heads of School to promote the educational achievement of registered pupils who are looked after, previously looked after, have a social worker or in Kinship who attend our school.

Our governing bodies and proprietors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, and their local multi-agency safeguarding arrangements

Our governing body will ensure when our school facilities/premises are hired or rented to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), appropriate arrangements are in place to keep children safe.

Our school have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act our school must not unlawfully discriminate against pupils or staff because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and

maternity, or sexual orientation (protected characteristics). Our governing body will carefully consider how we are supporting our pupils with regard to protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

6.Roles and Responsibilities of staff

Designated and Deputy Designated Safeguarding Lead/s

Our designated safeguarding lead (DSL) is Natalie Showell
Our deputy safeguarding lead/s (DDSL) are Emma Harris, Jayne Beech and Tara Smith

The role of the DSL/DDSL: Our DSL takes the lead responsibility for safeguarding and child protection (including online safety and filtering and monitoring systems and processes). The designated safeguarding will have the appropriate status and authority within our school to carry out the duties of the post**.**

The DSL or a DDSL, will always be available during school hours. Robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances are in place.

Manage referrals:

The DSL in our school will refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- where a crime may have been committed to the Police as required

Work with others:

The DSL in our school will:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.
- as required, liaise with the "case manager" and the local authority designated officer (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co coordinators (SENCOs) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a

referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. **This includes:**
- ensuring that staff in school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes

Information sharing and managing child protection files:

Our DSL will ensure:

- child protection files are kept up to date, and such Information will be kept confidential and stored securely.

Records will include:

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

Where children leave our school (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school as soon as possible, and **within 5 days for an in-year transfer or within the first 5 days of the start of a new term.** The designated safeguarding lead will also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil to help them put in place the right support to safeguard this child and to help the child thrive in the school.

Raising awareness

Our designated safeguarding lead will:

- ensure each member of staff has access to, and understands, this policy and procedures, especially new and part-time staff
- ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly

- ensure this policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and our school leadership staff

Training knowledge and skills

Our designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. Our designated safeguarding lead (and any deputies) will also undertake Prevent awareness training. Training will provide our designated safeguarding leads (and any deputies) with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing family help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation
- can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training will support our designated safeguarding lead (and deputies) in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, our designated safeguarding leads (and deputies) will be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

Our designated safeguarding lead (and deputies) will be equipped to:

- understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary, secondary and post-16 education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection laws
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as children's social care or prevent referrals

Roles and Responsibilities - All staff

All staff are given part one of KCSiE and all staff receive annual safeguarding training and regular safeguarding updates throughout the course of the year. Staff confirm that they

have received, read, and understood our school's safeguarding policies and procedures and that they have attended safeguarding training.

- All staff have a responsibility to provide a safe environment in which children can learn.
- All staff have a responsibility to identify children who may benefit from early help, family help or who are suffering, or are likely to suffer, significant harm.
- Any staff member who has a concern about a child must follow the referral process.
- All staff have a responsibility to take appropriate action, our staff will be expected to support social care and other agencies following referrals.
- In addition to working with the designated safeguarding lead or deputy designated safeguarding lead staff members should be aware that they may be asked to support social workers and other agencies to support with community-based Early Help or targeted Family Help work for a child
- During induction, all staff members will be made aware of the systems within our school which support safeguarding systems, and these will be explained to them as part of their induction programme.
- All staff members will receive appropriate safeguarding/child protection updates regularly throughout the academic year to maintain a vigilant culture for safeguarding.
- All staff will be made aware of procedures for online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.
- All staff will be made aware of what to do if a child discloses that they are being abused, neglected or exploited and how to maintain confidentiality
- All staff members will be made aware of the types and signs of abuse, neglect and exploitation
- All staff will be aware of the seven golden rules for sharing information, if in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy
- All staff will speak to the designated safeguarding lead with regards to any concerns about female genital mutilation. Our teachers know that there is a legal duty placed upon, teachers must report to the police if they discover that an act of female genital mutilation appears to have been carried out on a girl under the age of 18
- If staff have concerns, or an allegation is made about another member of staff (including volunteers, trainee teachers and supply staff) posing a risk of harm to children, then the concern should be referred to the headteacher. If the concern is about the headteacher the member of staff should report this to the chair of governors.
- Staff will follow the school's whistleblowing policy and procedures or contact the NSPCC whistleblowing helpline.
- All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues

Supply staff, trainee teachers, volunteers and work experience students working in our school will:

- Work within the school's staff code of conduct policy, KCSIE duties, safeguarding/child protection policy, managing allegations policy, acceptable use of technology policy and confidentiality/information sharing expectations

- Immediately share any concerns about a child's welfare with the designated safeguarding lead or a DDSL using the appropriate reporting and recording systems (these may be bespoke depending on the role of the adult).

Parental Responsibilities

We have an open-door policy where we encourage parents to share any concerns regarding their own children or any other child/children who they feel may be at risk of harm. All concerns will be explored in a sensitive and timely manner.

We will always ask for consent from parents and carers to seek additional support from partner agencies to meet the needs of the child and family. If gaining consent would put the child at risk of significant harm, this won't be sought.

Parents /carers should ensure their child attends school every day and that they arrive on time and are collected on time.
Should a pupil not be collected on time, the school will ensure that safeguarding arrangements are in place and the pupil will always be supervised by a member of staff until parents/carers arrive. In exceptional circumstances, we will follow the partnership Children not Collected policy (2025) and speak with MASH24 for support and advice to ensure the child can get home safely (this may involve professionals supporting from partner agencies and/or the child being transported by a trusted adult other than the parent/carer).

We expect parents/carers to notify us of any changes in family circumstances and inform us of any changes of address and contact numbers. When reasonably possible, we should be provided with more than one emergency contact number.

Children's Responsibilities

The safeguarding culture within our school is one that encourages all children to do their best and to talk freely about any concerns or worries. We provide opportunities that enable our children to take and make decisions for themselves.

Children will always be taken seriously and listened to if they seek help from a member of staff. Our school encourages all pupils to share any worries or concerns with any adult, at any time.

7.Confidentiality and Information sharing

Our school adopts the principles outlined in the DfE Information Sharing Duty (September 2026). Data protection legislation (the Data Protection Act 2018 (the DPA 2018) and UK General Data Protection Regulation (UK GDPR). GDPR does not prevent the sharing of information for the purposes of safeguarding children. In fact, data protection legislation provides a framework which enables information sharing in that context. The first and most

important consideration is always whether sharing information is likely to support the safeguarding of a child.

Where the information sharing duty applies, our school must share information with another organisation, or a requestor, if it is considered that sharing may help the recipient's relevant functions, including assess need, make a decision, provide support or take action to safeguard and promote the welfare of a child, including when a child potentially poses a risk to others. Our school may be a requestor of such information, from an external agency, to support us to effectively safeguard our children.

We recognise that all matters relating to child protection are confidential. The designated safeguarding lead and deputies will disclose any information about a child to other members of staff on a need-to-know basis only. All staff know they have a professional responsibility to share information with other statutory agencies to safeguard children.

All staff know they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. If a child wishes to confide in a member of staff and requests that the information is kept secret, the member of staff will appropriately state that they cannot promise confidentiality and will need to pass the information on to help keep the child or other children safe.

8.Communication with parents and carers

Our school will always aim to work transparently with parents/carers when discussing safeguarding concerns and will seek consent before making referrals wherever appropriate. The information sharing duty does not apply in extremely limited circumstances where our staff determine through professional judgement that sharing information would be more detrimental to the child than not sharing. These circumstances are:

- The child being placed at immediate risk of harm by the information being shared.
- Interfering with a police investigation, such that the consequence is likely to be of greater detriment to a child, including placing another child at increased risk of harm.
- Contravention of the Family Procedure Rules, or order of the Family Court or Family Division of the High Court.

In the best interests of safeguarding children there will be occasions when the school consult with other agencies without parent or carer prior knowledge. Such consultation may result in a formal referral which could prompt visits from social care and/or the police. We fully understand that this can be a very distressing set of circumstances. Our school will follow the procedures stated in the Information Sharing Duty (2026) to ensure that we fulfil our professional responsibilities in safeguarding children.

The visit may take place at the school at the request of the police or social care. In the event of the meeting being held at school parents/carers will be asked to remain on the school premises until such time that the police or social care can attend. If parents/carers choose to leave the premises with their child, the school will contact the police or social care to inform them of the parent/carer decision.

Our school will endeavour to employ the services of an interpreter if required.

9. Advice for all staff, trainee teachers, supply staff and volunteers - What to do if a child discloses

All staff will refer to '*What to do if you are worried a child is being abused' DfE March 2015*

Our staff will:

- Keep an open mind.
- Reassure.
- Listen carefully.
- Work at the child's pace.
- Where appropriate, ask only open questions in a non-leading way.
- Record accurately and quickly using child's words/action.
- Pass all the information on to the DSL, or the deputy DSL as immediately as possible
- At all times, keep children and young people safe.
- Treat everyone with respect.
- Follow the procedures for reporting and recording safeguarding concerns.

Our staff won't:

- Make false promises
- Interrupt/Interrogate/Investigate
- Make assumptions
- Make suggestions about what is being said
- Speculate or accuse anyone
- Show anger, shock etc.
- Tell the child to go and speak to someone else
- Discuss with parent/carers without speaking to the DSL
- Forget to record accurately and/or pass on to DSL
- Discuss with any other staff other than the DSL
- Leave any related written information laying around
- Jump to conclusions about people's behaviour without knowing the facts
- Investigate an allegation of child protection concern themselves

10.Our reporting and recording procedures

At Low Hill Nursery School we use an online reporting system called CPOMS. CPOMS is used to report and record information about a child. Staff are expected to record and report information in a timely manner this means that information MUST be recorded as soon as possible and MUST be recorded before the end of the school day. If a child makes a disclosure this MUST be shared verbally with a DSL/DDSL immediately and then recorded onto CPOMS after sharing verbally.

11. Support before statutory intervention

Our staff understand that any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted level of Family Help. Our staff are particularly alert to the potential need for a child who:

• is disabled or has certain health conditions and has specific additional needs
• has special educational needs (whether they have a statutory Education, Health and Care plan or not)
• has a mental health need
• is a young carer
• is pregnant and or is a parent themselves
• has exhibited early signs of abusive, violent and/or harmful behaviours
• 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, home or care
• has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit
• is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
• is at risk of being radicalised into terrorism
• has a parent or carer in custody, or is affected by parental offending
• is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
• is misusing alcohol and other drugs themselves
• is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
• is a privately fostered child

12.Making a referral to children's social care

Upon receipt of a safeguarding concern, the designated safeguarding lead or deputy will decide and seek advice to determine whether the concern/disclosure meets a threshold for support.
The designated safeguarding lead or deputy will consider:

Is this a child with unmet needs, where health, development or achievement may be affected, In Wolverhampton we may complete an Early Support Plan (ESP) when:

- Age-appropriate progress is not being made, and the causes of concern can be led by us and supported through a range of agencies and services

If this is a child with additional needs the designated safeguarding lead or deputy will discuss the issues with the child's parents/carers. The designated safeguarding lead or deputy must obtain parental consent for an Early Support Plan to be completed.

Is this a child in need (CIN)

Section 17 of the Children Act 1989 says:

- The child is unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development
- The child's health or development is likely to be impaired, or further impaired without the provision of such services
- The child has a disability.

Is this a Child Protection matter (CP)

Section 47 of the Children Act 1989 says:

- Children at risk or who are suffering significant harm
- Children suffering the effects of significant harm
- Serious health problems.

We will always contact MASH24 for support and guidance when we are concerned about a child in our school.

Making a referral

If, a child is in immediate danger or is at risk of harm a referral will be made to children's social care and /or the police immediately.

The school's designated safeguarding lead or deputy will be the appropriate staff to initiate any referral. A record of the concerns should be made using the school's reporting and recording system. This should be used to aid in the decision-making process if a referral is needed to the MASH24.

For referrals to MASH24

Phone 01902 555392

Advice may be for our DSL/DDSL to complete an E-MARF (Electronic Multi Agency Referral form). We will seek consent from parents/carers before submitting an E-MARF into MASH24 and the content on the E-MARF will be known to the parent/carer. Following submission, the E-MARF will be held on the child's record.

If there is risk of significant harm or significant harm to a child, we will not seek consent to submit an E-MARF to MASH24. Therefore, the content on the E-MARF will be unknown to the parent/carer.

13.Voice of the child (children's wishes)

Children's wishes and feelings are considered when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback.

Staff members do not promise confidentiality for any safeguarding concern and always act in the best interests of the child.

14.Record Keeping

At our school all records of concerns and safeguarding/child protection files are stored separately from the pupil's school file.

If a pupil moves school, we will transfer the files either in person or the file will be transferred securely via electronic systems and separately from the pupil's main file **within 5 days**. We will obtain a receipt from the receiving school. If our school is the last known school the child attend, records will be retained until the child's 25th birthday.

If a pupil arrives at our school with a child protection file, we will ensure key staff such as designated safeguarding leads, designated teacher and SENCOs are aware as required.

In addition to the child protection file, our designated safeguarding lead will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

15. Safeguarding Training

All staff members including governors will undergo safeguarding and child protection training at induction. The training will be regularly updated. Induction and training provided will be in line with advice from WST.

Upon appointment and starting the new post, new staff, trainee teachers, volunteers and work experience students will be issued with an induction pack, safeguarding and child protection policy, Keeping Children Safe in Education -Part 1, Whistleblowing Policy, Management of Allegations Policy, Code of Conduct, Acceptable use of IT policy, the school's behaviour policy, our school's children absent from education procedures and other relevant safeguarding information e.g. the name of the designated safeguarding lead/DDSL. They will sign to say that they have received it, read, and understood it.

At an appropriate time after induction, a meeting will be arranged by a member of the safeguarding team to clarify and check understanding of all new staff and to respond to any questions or further training requirements.

Staff Training

All staff have annual safeguarding training which includes any updates in Keeping Children Safe in Education. All staff will be trained in Prevent, Online Safety and Medical needs, including allergies.

All staff members will receive regular safeguarding and child protection updates including online safety (for example, via email, e-bulletins, staff meetings, designated CPD sessions during the academic year), to provide them with relevant skills and knowledge to safeguard children effectively.

Our governing body recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns daily. Opportunity will therefore be

provided for staff to contribute to and shape safeguarding arrangements and the safeguarding and child protection policy.

Governor Training

All governors receive annual safeguarding training, including Prevent and Online Safety. This will include the school's filtering and monitoring systems and procedures when online safety alerts arise.

Records of governor training are held with the Head teacher.

Safer Recruitment Training

Our school will ensure that at least one member of any recruitment panel has received safer recruitment training.

The member of staff who holds the SCR in our school will have appropriate safer recruitment training which will be renewed regularly.

16. Safer working practices

Our school has a code of conduct; all staff, supply staff and volunteers are issued with this at induction.

Staff will seek to keep their personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children:

- Work in a room where there is a glass panel in the door or leave the door open.
- Make sure that other adults visit the room occasionally.
- Avoid working in isolation with children unless necessary.
- Must not give out personal mobile phone numbers or private e-mail addresses.
- Must not give pupils lifts home in your cars without risk assessments in place.
- Must not arrange to meet them outside of school hours.
- Must not chat, befriend or follow any pupil on any social media platform.

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

Any use of physical force or restraint of pupils will be carried out and documented in accordance with the relevant Restrictive Interventions (including reasonable force) policy. If it is necessary to use physical action to prevent a child from injury to themselves or others, parents will be informed in writing.

17. Safer recruitment

To create a safe environment for our children our school will adopt the safer recruitment procedures that help deter, reject, or identify people who might abuse children, outlined in part 3 of Keeping Children Safe in Education. We will monitor to ensure that the policy and procedures are embedded and effective.

Our school will ensure that at least one member of any recruitment panel has received safer recruitment training.

Our school adheres to statutory responsibilities to check staff who work with children, making decisions on whether to ask for any checks beyond what is required; including that for volunteers. A person will be in regulated activity if, because of their work or volunteering, they:

• will be responsible, on a frequent basis in school for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children
• engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Any volunteer who works in our school and takes part in regulated activity will have an enhanced DBS check with children's barred list.

We expect all staff to have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct to maintain confidence and respect of the public and those with whom they work.

There may be times where an individual's actions in their personal life come under scrutiny from the community, the media, or public authorities, including about their own children, or children or adults in the community. Our staff are aware that their behaviour, either in or out of the workplace, could compromise their position within the work setting in relation to the protection of children, loss of trust and confidence, or bringing the employer into disrepute. Such behaviour may also result in prohibition from teaching by the Teaching Regulation Agency (TRA) a bar from engaging in regulated activity, or action by another relevant regulatory body.

The Childcare (Disqualification) Regulations 2018 set out grounds for disqualification under the Childcare Act 2006 where the person meets certain criteria set out in the Regulations.

For example,

- an individual will be disqualified where they have committed a relevant offence against a child
- been subject to a specified order relating to the care of a child
- committed certain serious sexual or physical offences against an adult
- been included on the DBS children's barred list
- been made subject to a disqualification order by the court
- previously been refused registration as a childcare provider or provider or manager of a children's home or had such registration cancelled.

A disqualified person is prohibited from providing relevant early or later years childcare as defined in the Childcare Act 2006 or being directly concerned in the management of such childcare.
We understand that schools are also prohibited from employing a disqualified person in respect of relevant early or later years childcare.

At our school all shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children e.g.

• if they have a criminal history
• whether they are included on the barred list
• whether they are prohibited from teaching
• whether they are prohibited from taking part in the management of an independent school
• information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
• if they are known to the police and children's social care
• have they been disqualified from providing childcare
• any relevant overseas information

In addition, as part of the shortlisting process we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks.

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad will be conditional on satisfactory completion of the necessary pre-employment checks and satisfactory references.

All offers of appointment to work in our school will be conditional until satisfactory completion of the mandatory pre-employment checks. Our school will:

- Verify a candidate's identity
- Obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- Verify the candidate's mental and physical fitness to carry out their work responsibilities
- Verify the person's right to work in the UK, including EU nationals
- if the person has lived or worked outside the UK, further overseas checks may be made
- Verify professional qualifications
- Check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State.
- Check that the candidate is not disqualified under the Childcare Act 2006 (2018 regulations) where relevant

These checks are part of a wider safeguarding regime which will carry on following appointment.

Our school understands that it is a criminal offence to allow any individual who is barred to carry out any form of regulated activity. Our school will comply with the legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

For any member of staff appointed to carry out regulated activity with children, an additional check will be undertaken to ensure they are not prohibited from teaching (including directions, sanctions, and restrictions).

Our school keeps a Single Central Record that complies with all statutory requirements. It is held by an appropriate senior member of staff and regular audits are completed by appropriate internal and external auditors. A record of these audits with any appropriate actions are held.

Our Single Central Record covers the following people:

- All staff (including third-party and supply staff), teacher trainees on salaried routes
- Volunteers
- Governors
- Agency, third-party staff, and contractors who have regular contact with the school (if a contractor is self-employed, they should provide a valid DBS)

The following information will be recorded on the Single Central Record:

- An identity check
- A standalone children's barred list check.
- An enhanced DBS with certificate (with children's barred list)
- Prohibition from teaching check
- A section 128 check
- Further checks on people who have lived or worked outside the UK
- A check of professional qualifications, where required
- A check to establish the person's right to work in the United Kingdom.

The SCR will indicate the date when each check listed above was completed (or certificate obtained).

Our school will obtain written confirmation that the employment business supplying staff has carried out the relevant checks and obtained the appropriate certificates. Our school will also check that the person presenting themselves for work is the same person on whom the checks have been made (Identity check)

We will obtain written confirmation from alternative providers for any provision for a child whether this is part time or full-time educational provision. We will confirm they have undertaken the relevant pre-employment and DBS checks for their staff who will be working

with our children. We understand that the safeguarding responsibilities remain with us as a school.

All applicants MUST show their current original DBS certificate to the school as soon as they take up post. These will not be kept by the school once recorded on the SCR.

18. Safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors

All our staff understand the process and procedures to follow if they have a safeguarding concern about another staff member. These procedures are shared with all supply, third-party agency staff, trainee teachers, volunteers, contractors and visitors to our school.

Our Managing Allegations policy complies with the guidance set out in part four of Keeping Children Safe in Education.

All allegations of abuse of children will be taken seriously. Where it is alleged that anyone working in the school, including supply teachers, trainee teachers, volunteers and contractors has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside of school)

If an allegation is made against a member of staff, volunteer, supply staff, trainee teacher or contractor, the headteacher must be informed immediately or as soon as possible within 1 working day and they must contact the LADO (Kelly Matthews) immediately to discuss the allegation to consider the nature, content and context of the allegation and agree a course of action.

If our school must consider an allegation against an individual not directly employed by us, where our disciplinary procedures do not fully apply, for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business, whilst our school is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will our school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

If an allegation is made against the headteacher the member of staff who has the concern must contact the chair of governors, who must then contact the LADO (Kelly Matthews) immediately or as soon as possible within 1 working day to discuss the allegation to consider the nature, content and context of the allegation and agree a course of action.

When dealing with allegations, our school will:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently

• provide effective protection for the child and support the person subject to the allegation

We may receive an allegation relating to an incident that happened when an individual or organisation were using our school premises for the purposes of running activities for children. As with any safeguarding allegation, we will follow our safeguarding policies and procedures, including informing the LADO.

Concerns or allegations that do not meet the harm threshold – Low-level concerns

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers and contractors) that does not meet the harm threshold, then this should be shared in accordance with the low-level concerns section in our managing allegations policy.

At our school we create a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work

• does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO

Examples of such behaviour could include, but are not limited to:

• being over friendly with children
• having favourites
• taking photographs of children on their mobile phone, contrary to school policy
• engaging with a child on a one-to-one basis in a secluded area or behind a closed door
• humiliating pupils

Our school understand that Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

All low-level concerns will be recorded in writing. The record should include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records will be retained by the Headteacher and will be reviewed regularly so that potential patterns of concerning behaviour can be identified.

When the school supplies a reference for a staff member, we will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

The Local Designated Officer in Wolverhampton (LADO) is Kelly Matthews.

19. Whistleblowing

All staff, supply staff, trainee teachers, volunteers, contractors and parents/carers should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and such concerns will be taken seriously by our Headteacher and Chair of Governors.

Where a staff member feels unable to raise an issue with our Headteacher or Governing Body or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them, for example:

The NSPCC whistleblowing helpline – What you can do to report abuse is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

20. Safeguarding Curriculum and Online Safety

Our school staff will ensure that all children are taught about how to keep themselves and others safe, including online. Our safeguarding curriculum will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND).

Our staff understand they play a crucial role in preventative education. We have a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

Our safeguarding curriculum will tackle, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships
- boundaries, consent and kindness in relationships
- stereotyping, prejudice and equality
- body confidence and self-esteem

Online safety curriculum and computing, use of mobile technology

Our Online Safety lead is Natalie Showell

Our school staff understand that children need to be safeguarded from potentially harmful and inappropriate online material. Our approach to online safety empowers our school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories

contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

conduct: 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 self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Children can engage in or be a target of Cyber-bullying using a range of methods including text, sexting, and instant messaging to reach their target. Mobile phones are also used to capture violent assaults and inappropriate images or other pupils for circulation (e.g. happy slapping/sexting).

We will make children aware of the dangers through age-appropriate curriculum teaching particularly computing and IT lessons, Online Safety curriculum, PSHE. We will refer to several approved teaching resources such as Project Evolve and CEOP Education Programme to support our online safety teaching.

We will use appropriate external providers where possible to support our teaching of online safety.

Our school ensures:

- Software (filters, firewalls, and monitoring) are in place to minimise access and to highlight any person or child accessing inappropriate sites or information
- Children will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns the schools DSL/DDSL will be informed immediately)
- Children are taught not give out personal details, phone numbers, schools, home address, computer passwords etc

- Children should adhere to the school policy on mobile devices including phones, smart watches, glasses and any other mobile device that can capture and share images/videos or be used for the internet
- All staff receive online safety training
- We will review our Online Safety policy at least annually
- We treat all online safety concerns seriously, including those which may involve the use of AI (Artificial Intelligence)

The police will be involved, and advice will be sought from CEOP if required if there is any criminal element to misuse of the internet, phones, or any other form of electronic media.

Use of mobile phones, cameras, and other technology devices

We recognise that many aspects of the curriculum can be enhanced using multi-media and that there are now a wide and growing range of devices on which this can be accomplished. Digital images, video and sound recording are only taken with the permission of participants; images and video are of appropriate activities and are only taken of children wearing appropriate dress. Full names of participants are not used either within the resource itself, within the filename or in accompanying text online.

Our school is a mobile-free environment by default during the school day

All parents & visitors are asked not to use mobile devices or any device that can capture images or be used for recording (e.g. I-pads, phones, smart watches, glasses with ability to record/capture images), when visiting our school. All staff will be vigilant and remind any parents/visitors of our expectations when necessary.

We ask all parents/carers to sign an agreement about taking and publishing photographs and video of their children and this list is checked whenever an activity is being photographed or filmed. Should parents and carers wish to change these permissions at any time, they must inform the school.

School I-Pads, laptops or similar devices with communications facilities used for curriculum activities are set up appropriately for the activity and will have filtering and monitoring systems to protect children. If children use school devices, they are taught to use them responsibly.

21. Preventing Radicalisation (Prevent Duty)

Children may be susceptible to radicalisation into terrorism. Like protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

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.

https://www.gov.uk/government/publications/prevent-duty-guidance/glossary-of-terms

We understand there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral to the Channel programme.

From 1 July 2015 we have had "due regard" to the need to prevent people from becoming terrorists or supporting terrorism". **This duty is known as the Prevent duty**.

We will:

- Assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology
- Work in partnership with parents, children, families, and statutory agencies
- Assess the risk in our local area and as a minimum all staff will undertake Prevent awareness training to upskill them on protecting children from the risk of radicalisation
- Our DSL/DDSL will complete training for Channel referrals
- Our school will hold a Prevent risk assessment/Action plan (in line with the Prevent Duty guidance 2023), which will be reviewed annually
- Ensure that suitable filtering and monitoring is in place on all devices in our setting (both staff and pupil devices), including those we may loan for home use. Our children are taught to stay safe online which is integral to our school's curriculum.

We aim to build the children's resilience to radicalisation by providing a safe environment and through aspects of the curriculum including SMSC, British Values, PSHE, RSE and Citizenship.

Channel

Channel is a voluntary, 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. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Our DSL/DDSL understands when it is appropriate to make a referral to the Channel programme. Our DSL/DDSL will also consider if it would be appropriate to share any information with a new school in advance of a child leaving who may be receiving support through Channel programme.

Our school will contact the Wolverhampton Community Safety Team for any advice or the Local Authority Prevent Co-Ordinator:

safer@wolverhampton.gov.uk

The Wolverhampton Local Authority Prevent Co-Ordinator is Deborah Smith.

22. Cybercrime

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)

Children with 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 designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme.

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 or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
• 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.

Our school take Cyber Security seriously and ensure that we meet the required DFE Cyber security standards for schools. All staff have appropriate training in Cyber Security.

23. Children potentially at greater risk of harm

Whilst our school protects all children, we recognise that some groups of children, are potentially at greater risk of harm than others (both online and offline).

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

Some of our 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. Where children need a social worker, this will inform our decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare.

Children who are absent from education

We recognise that 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.

Our response to persistently absent children, and children missing education (CME) supports identifying such abuse, and in the case of absent children, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Elective home education (EHE)

Our school expect that a parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from our school with a view to educating at home, we will work with the local authority and other key professionals to coordinate a meeting with parents/carers where possible. This is particularly important for us where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. If a child has an Education, Health and Care plan the local authority will be responsible for reviewing the plan with parents/carers.

Children requiring mental health support

Our school have an important role to play in supporting the mental health and wellbeing of our children. **All our staff are aware that mental health problems can, in some cases, develop into safeguarding concerns**. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Our staff support the fulfilment of 4 key roles:

- promoting good mental wellbeing and preventing the onset of mental illness
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one
- ensuring early targeted support is provided
- liaison with/referral to specialist services where needed

Where support is needed, our DSL/DDSL will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

Our DSL/DDSLs and/or our Mental Health Lead in school will prevent mental health problems by promoting wellbeing and resilience as part of our integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of our children and learners.

We support our children with mental health and wellbeing through the curriculum. Staff will ensure all children are aware of strategies to support their own wellbeing and that of their peers. We foster a culture of open communication, empathy, and respect where children feel comfortable seeking help. We will always balance the need for confidentiality with the need to safeguard our children, ensuring that information is shared appropriately with relevant professionals. We are mindful of cultural and religious beliefs that may impact attitudes towards suicide and mental health.

If a child discloses suicidal thoughts to a member of staff, we will immediately contact MASH24 and the parent/carer. If we feel the child is in immediate danger, we may call 999 for an emergency response.

If our school is involved with any critical incident, all pupils and staff will receive appropriate support through the Local Authority Education Psychology team and other relevant professionals. Support for parents and the local community will also be provided where necessary.

Looked after children, previously looked after children

Our designated teacher is: Emma Harris

Our designated teacher will undertake any relevant training to update their skills, understanding and knowledge to enable them to keep our looked after children and previously looked after children safe. Our designated teacher will promote the educational, physical, social, and emotional welfare of children who are looked after and previously looked after children.

Previously looked after children are children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales.

Our designated teacher will ensure:

- They obtain information regarding, contact arrangements with birth parents or those with parental responsibility.
- They have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order)
- They obtain information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- They obtain the name of the child's social worker.

- They obtain the name and contact details of the virtual head in the local authority that looks after the child.
- They liaise with the virtual school headteacher to discuss how the funding for that child can be best used to support the child's need outlined in the personal education plan.
- They liaise with the Virtual Head appropriately to support any child with a social worker and any child in Kinship. Virtual Heads have a non-statutory responsibility for the strategic oversight of the educational achievement and attendance of these children.
- They seek support and advice from the LA School Improvement Advisor for Looked After Children and Children with a Social Worker when necessary.

Care leavers

Local Authorities have on-going responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training.

Our designated safeguarding lead or deputy will liaise with the Local Authority personal advisor appointed to guide and support any care leaver and share any issues of concern affecting the care leaver.

Young carers

Our school are alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. When identified, we will ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Children with special educational needs, disabilities, or health issues

We are aware that children with special educational needs, disabilities, neurodivergent or certain health issues may face additional safeguarding challenges both online and offline. Barriers can exist when recognising abuse and neglect and exploitation in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care

- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so.

We will ensure we have appropriate mechanisms in place to assist these children. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO. We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Our school will seek support from The Special Educational Needs and Disabilities Information and Support Services (SENDIASS) if necessary.

Children who are lesbian, gay, bi or trans (LGBT)

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

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Children who are questioning their gender

In recent years, we have seen a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

Our staff recognise that it is common for children to engage in activities that are less typically associated with their sex. For example, at primary school age, girls may play with trucks, or boys may dress in clothes that are perceived as feminine. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

Our staff will take time to understand the thoughts and feelings of children who are questioning their gender and will be appropriately professionally curious about the full range of the child's experiences. In doing so, we will remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Considering requests for support with social transition

Our school will not initiate any action regarding social transition; we will seek advice from DFE guidance and Keeping Children Safe in Education when a child or their parent has requested that our school make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition"). Our DSL/DDSL and staff will not adopt any changes relating to social transition unless a decision has been made by

senior leaders in school and a child's parents or carers have been involved as set out in DFE guidance. All our decision-making process will be documented and records kept.

In making decisions about supporting social transition, our school will comply with our distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by our evaluation of the welfare and best interests of the child and other children.

Our decisions will be in line with the following principles:

- As a school, we have statutory duties to safeguard and promote the welfare of all children
- Parents and carers should be actively involved and their views treated with importance (if involving parents or carers would constitute a greater risk to the child than not involving them, our DSL will decide on the best course of action to safeguard the child before contacting parent/carer)
- Accommodating social transition is an active intervention so we will take a very careful approach
- As a school, we will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition
- As a school, where we support any degree of social transition, this will not include allowing access to toilets, changing rooms or boarding or residential accommodation designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex where there are safety reasons for single-sex PE.

Reviewing cases

The circumstances of a case and/or the needs of a child may change over time. For example, it may become known that there are safeguarding issues that were not previously apparent or that a decision has placed an unsustainable pressure on our school's resources. We may therefore need to review our original decision considering the factors set out above, including involving the child's parents or carers. In deciding whether to review a decision, our DSL will be involved with other senior leaders.

Children living in stealth

Our school are particularly conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, our school, friends/staff may be unaware of their biological sex). We are aware from the Cass Review, that these children are likely to approach puberty in a fearful and anxious state. Our school will offer support when necessary.

Our school recognises the importance of maintaining flexibility and keeping options open for children who have socially transitioned. Support will be provided to children who wish to de-transition. We will work closely with parents or carers and relevant experts to ensure that children in this position are supported.

24. Types and indicators of abuse and neglect

All staff are familiar with the types and indicators of abuse. They are aware that abuse, neglect, exploitation and modern slavery and other safeguarding issues, are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All will understand that children can be at risk of harm inside and outside of home and online. They will exercise professional curiosity and know what to look for to identify abuse and neglect early.

All staff are expected to be always vigilant and recognise indicators for the categories of abuse and neglect:

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

Physical abuse: 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.

Emotional abuse: 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

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

Neglect: 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 because 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

caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

25. Safeguarding issues

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). All our staff 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 including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines)
- [i]Radicalisation
- consensual and non-consensual sharing of self-generated intimate images including those generated using AI e.g. deepfakes and/or videos.

These are contextual safeguarding issues. Our staff understand that as children get older, these risks can increase. Our staff are trained to spot the signs and indicators of contextual safeguarding issues and report these inline with our reporting and recording systems.

26. Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Our staff understand that exploitation and modern slavery is child abuse and relevant child protection procedures must be followed. 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 (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, we will ensure 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, having a physical or learning disability, or being neurodivergent, 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 which 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 and sexual exploitation
• associate with other children involved in exploitation
• suffer from changes in emotional well-being
• misuse alcohol and other drugs
• go missing for periods of time or regularly come home late, and
• regularly miss school or education or do not take part in education.

Child Sexual Exploitation (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. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion.

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

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

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". Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children are increasingly being targeted and recruited online using social media.

Our staff understand that 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.

Several of the indicators for CCE and CSE 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

• have their bank accounts used to facilitate drug dealing

Whatever form it takes, exploitation and modern slavery (including county lines) is child abuse, and our school will make relevant child protection and modern slavery referrals if there is suspicion.

27. Child-on-child abuse (including harrassement and violence)

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children.

We recognise that some children will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's relevant policy e.g. behaviour policy. All staff recognise that children can abuse their peers and that it can happen inside and outside of school or online. All our staff understand the policy and procedures regarding child-on-child abuse and the important role they must play in preventing it and responding where they believe a child may be at risk from it.

All our staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

All our staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples include:

Downplaying certain behaviours, 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 behaviour, misogyny, 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.

All allegations will be carefully considered, and all decisions will be made on a case-by-case basis in consultations with social care.

Referrals under safeguarding arrangements may be necessary, key specific considerations will include:

- The age, maturity and understanding of the children
- Any disability or special needs of the children

Child on child is most likely to include, but not limited to;

• bullying (including cyberbullying, 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 harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

• serious physical assault and harm, or the threat of harm with a weapon

• sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

• sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone 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 self-generated intimate images and/or videos including those generated using AI e.g. deepfakes

• upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm

• 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).

Understanding harmful sexual behaviour (HSB), sexual harassment and sexual violence

HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children.

HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable. All our staff are trained in the importance of:

• making clear that there is a zero-tolerance approach to sexual harassment and sexual violence; that it is never acceptable, and it will not be tolerated. It will never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment

and in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it

• recognising, acknowledging, and understanding the scale of HSB, sexual harassment and sexual violence and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported

• recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence

• challenging 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

• taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

Our staff are aware that children who are victims of HSB, sexual harassment or sexual violence wherever it happens, may find the experience stressful and distressing. Whilst any report of HSB, sexual harassment or sexual violence will be taken seriously, our staff are aware it is more likely girls will be the victims of sexual harassment and sexual violence and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers.

Ultimately, all victims will be reassured by our staff that they are being taken seriously and that they will be supported and kept safe.

Harmful sexual behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both.

When assessing HSB, the ages and developmental stage of the children involved is critical. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g. due to a disability or physical size.

Our DSL/DDSLs have a good understanding of HSB through bespoke training. Referrals are made appropriately using the Local Authority HSB Pathway. Our staff recognise that HSB can, in some cases, progress on a continuum. Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual

harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma and our DSL/DDSLs will offer appropriate support

Sexual harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can:

• violate a child's dignity

• make them feel intimidated, degraded or humiliated

• create a hostile, offensive or sexualised environment.

Examples of sexual harassment can include:

• sexual "jokes" or taunting

• sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names

• physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes. Our school staff will assess when such behaviour crosses into sexual violence. We will talk to and consider the experience of the victim

• displaying pictures, photos or drawings of a sexual nature

• upskirting (this is a criminal offence)

• online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence. This may include:

• consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes**.** Taking and sharing nude photographs (including those generated using AI e.g. deepfakes) of those aged under 18 is a criminal offence

• sharing of unwanted explicit content

• sexualised online bullying

• unwanted sexual comments and messages, including, on social media

• sexual exploitation; coercion and threats

• coercing others into sharing images of themselves or performing acts they're not comfortable with online

Sexual violence

All staff in our school are aware that child-on-child sexual violence can and does occur, both inside and outside of school. Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003144 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. (a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault). Causing someone to engage in sexual activity without 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. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

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

• a 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

Responding to a report of HSB, sexual harassment and/or sexual violence

Our staff will act immediately on any concerns about a child's welfare, rather than wait to be told. All victims will be reassured 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 the school environment will be treated with equal seriousness.

Our staff are trained to manage reports appropriately. We will always endeavour to follow best practice:

• where possible, manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)

• careful handling and management of reports that include an online element, including an awareness of guidance on searching screening and confiscation **Staff will not view or forward illegal images of a child**. In some cases, it may be appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

• not promising confidentiality at the initial stage as it is very likely a concern will have to be shared further

• recognising that a child is likely to disclose to someone they trust: this could be anyone within the school staff.

• recognising that an initial disclosure may not reflect the full extent of abuse, and that trauma can impact memory meaning details may be affected keeping in mind that certain children may face additional barriers to disclosure especially for children with vulnerabilities related to disability, sex, ethnicity, or sexual orientation

• listening carefully to the child, reflecting, using the child's language, avoiding judgement, being clear about boundaries and how the report will be progressed, and asking only open-ended questions - such as where, when, what, etc.

• considering the best way to record the report. It is essential a written record is made

• record only what the child says, without interpretation or opinion. These notes may be used in statutory assessments and/or criminal investigations

Our staff will never promise confidentiality when receiving a report, as it is highly likely that it will be in the best interests of the victim to seek advice from others to provide support and engage appropriate agencies. Ultimately, the DSL/DDSL will balance the victim's wishes with the duty to protect them and other children.

Where an allegation of sexual harassment or sexual violence is progressing through the criminal justice system, our school understand the importance of anonymity. We will take reasonable steps to protect the anonymity of all children involved. Amongst other things, this includes carefully deciding, based on the nature of the report, which staff need to know about the report and what support that will be provided for the children involved.

Risk and needs assessment

Following a report of sexual violence, the DSL/DDSL will carry out an immediate risk and needs assessment. For a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

• the victim's safety and support needs

• potential other victims

• the alleged perpetrator(s)

• the wider school or college community, including staff and students, and any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms

• the location and time of the incident, with steps to improve safety in that area.

The DSL/DDSL with engage with local authority children's social care and specialist services as needed. In cases of sexual violence, professional risk assessments by social workers or sexual violence specialists may to be required.

Action following a report of HSB, sexual harassment and/or sexual violence

Our staff know that HSB, sexual harassment and sexual violence can happen anywhere. All staff working with our children maintain an attitude of '**it could happen here'** and respond appropriately to all reports and concerns whether they occur online, offline, or outside of the school.

Our DSL/DDSL will always consider:

• the victim's wishes regarding how they want to proceed. Victims will be given as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered, balanced against our duty to protect others

• the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB was displayed

• the ages and developmental stages of the children involved

• any power imbalance between the children such as differences in age, maturity, or social status. Consider if the victim has a disability or learning difficulty

• whether the alleged incident was isolated or part of 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 relationships between children

• importance of understanding intrafamilial harm and support for siblings if needed

• any ongoing risks to the victim, other children or school staff

• wider contextual concerns, including links to child sexual exploitation (CSE) or child criminal exploitation (CCE)

Our DSL/DDSL will consider how to manage a report through one of four options:

- Manage internally
- Universal services and community based Early Help assessment

- Referrals to Family Help – including targeted and local authority children's social care
- Reporting to the police

We will consider any bail conditions and the delays to any criminal processes. Nothing will delay the school in assessing and managing risks and supporting victims and alleged preparators throughout the duration of the investigation following a report to staff. Any sanctions that need to be issued, will be considered by senior leaders aligned with the school behaviour policy.

Our DSL/DDSL and senior leaders will consider best practice advice as set out in Part five of KCSIE 2026.

Working with parents and carers

Our school, senior leaders will, in most instances, engage with both the victim's and the parents or carers of the alleged perpetrator(s) when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and will be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk.

The school will work with the local authority children's social care and/or the police to ensure a consistent approach is taken to information sharing.

We will meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

We will meet the parents or carers of the alleged perpetrator(s) to discuss any arrangements that are being put into place that impact an alleged perpetrator(s), such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions will be explained. Support for the alleged perpetrator(s) will be discussed.

Safeguarding other children

Consideration will be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. We recognise that following any report of sexual harassment or sexual violence, it is likely that some children will take "sides". Our school will do all they can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed. Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves. We will offer appropriate support for online safety incidents.

28. Serious violence

All staff are aware of indicators which may signal that children are at risk from or involved in serious violence. These may include:

• increased absence from school

• a change in friendships or relationships with older individuals or groups

• a significant decline in educational performance

• signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries,

• unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation

The likelihood of involvement in serious violence may be increased by factors such as:

• being male

• having been suspended, spent time in Alternative Provision or permanently excluded from school

• having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Our staff are aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence. Our school work in partnership with the police and violence reduction partnership to support the safety of our children.

29. Domestic Abuse

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

• psychological
• physical
• sexual
• financial
• emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. The Domestic Abuse Act (2021) recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

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

Our staff will support any child who has experienced direct or indirect exposure to domestic abuse and treat them as a victim in their own right.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day.

Operation Encompass **does not replace statutory safeguarding procedures or referrals** and applies solely to domestic abuse incidents. Where appropriate, the police and/or our school will make a referral to local authority children's social care if we are concerned about a child's welfare. Our designated safeguarding leads take responsibility for receiving Operation Encompass notifications from the police. These are recorded on safeguarding files.

Our school is part of Operation Encompass.

30. Children absent from Education

Staff are aware that 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. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in 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 who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Our school has an admission register and an attendance register. All pupils are placed on these registers at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend our school. If the child fails to attend on the agreed or

notified date, our school will contact the parents or carers to establish why the child has not started.

Our attendance and admission registers are kept up to date. We actively encourage our parents and carers to inform us of any changes whenever they occur.

Our school monitors attendance regularly and we address any issues that may cause concern and where attendance fails to meet the expected level in line with our attendance policy. We follow guidance set out in Working together to improve school attendance (August 2024) and in partnership with the Local Authority we will:

- **Expect** high standards of attendance for all pupils
- **Monitor** attendance rigorously
- **Listen and Understand** barriers to attendance and agree how to resolve them
- **Facilitate support** to ensure all barriers are removed which may be outside the school setting
- **Formalise support,** when necessary, through attendance contracts
- **Enforce** attendance through statutory intervention when appropriate

Our school will notify the local authority of any child who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or, more at such intervals as are agreed by the school and the local authority. Our school will engage with the Education Welfare Officer when concerned about a child (who is of stator school age) attendance.

31. Private Fostering Arrangements

A private fostering arrangement is one that is made privately (without the involvement of the local authority) for the care of a child under the age of 16 years (under 18 if disabled) who is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer; for 28 days or more. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles, or aunts, (whether of full blood, half blood, or marriage/ affinity.)

School staff will notify the designated safeguarding lead or deputy when they become aware of private fostering arrangements. The DSL/DDSL will inform the LA through MASH24.

32. Honour or faith-based abuse (including female genital mutilation and forced marriage)

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including 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. Our DSL/DDSLs are aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. Our staff are alert to the possibility of a child being at risk of HBA or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they will speak to the designated safeguarding lead (or a deputy). As appropriate, the DSL/DDSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Where FGM has taken place, there is a mandatory reporting duty placed on teachers. Female Genital Mutilation Act 2003 places a statutory duty upon teachers 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. Teachers must personally report to the police.

Those failing to report such cases may face disciplinary sanctions. All our teaching staff will be supported with any reporting procedures by the DSL.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered 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 a marriage. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used.

School staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk.

33. Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

This can be stressful for children. Our school will use the Ministry of Justice online child arrangements information tool to support this process and will make this information available to parents and carers if they require our assistance.

34. Children with family members in prison

Some children who attend our school may have a parent who has been sent to prison or in custody. Our school will utilise the information NICCO provides designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Our school staff are aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff understand the need for tailored, trauma-informed and sensitive support that can help mitigate potential harm and help encourage stability.

35. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. When required our designated safeguarding lead or deputies will obtain contact details and know referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Our staff understand that 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. Our DSL/DDSL will make appropriate referrals and/or discussion with the Local Housing Authority, but this does not replace a referral that could be made into local authority children's social care where a child has been harmed or is at risk of harm.

The Children's Wellbeing and Schools Act places a new duty on local housing authorities in England to notify educational institutions when a child is placed in temporary accommodation. This notification should be made when consent has been given from the parent, those with parental responsibility or care of the child, or the child themselves in cases of 16–17-year-olds living independently from their parents.

The notification system is in place in Wolverhampton. The notifications enable our school to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes. This notification does not replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm.

36. Modern slavery and the National Referral Mechanism

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour.

Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

The National Referral Mechanism is the system used within the UK to support potential victims of exploitation and modern slavery. Our staff recognise the signs and indicators for children who may be a victim of exploitation and modern slavery and make appropriate referrals to the DSL/DDSL.

37. Child abduction and community safety incidents

Child abduction is 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.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

We teach children about community safety through our curriculum. We use external partners such as the police to support with key messages.

38. Monitoring policy and practice

Our safeguarding and child protection policy and procedures will be reviewed annually or sooner if required. All staff and stakeholders may contribute to the development of our policies and procedures.

Our policy will be published on our website, and paper copies are available upon request

Appendix A

Keeping Children Safe in Education 2026

Figure 1: Flowchart setting out the actions taken where there are concerns about a child

