



## Wilbury Primary School



# Safeguarding & Child Protection Policy and Procedures

**Updated for KCSIE September 2025**

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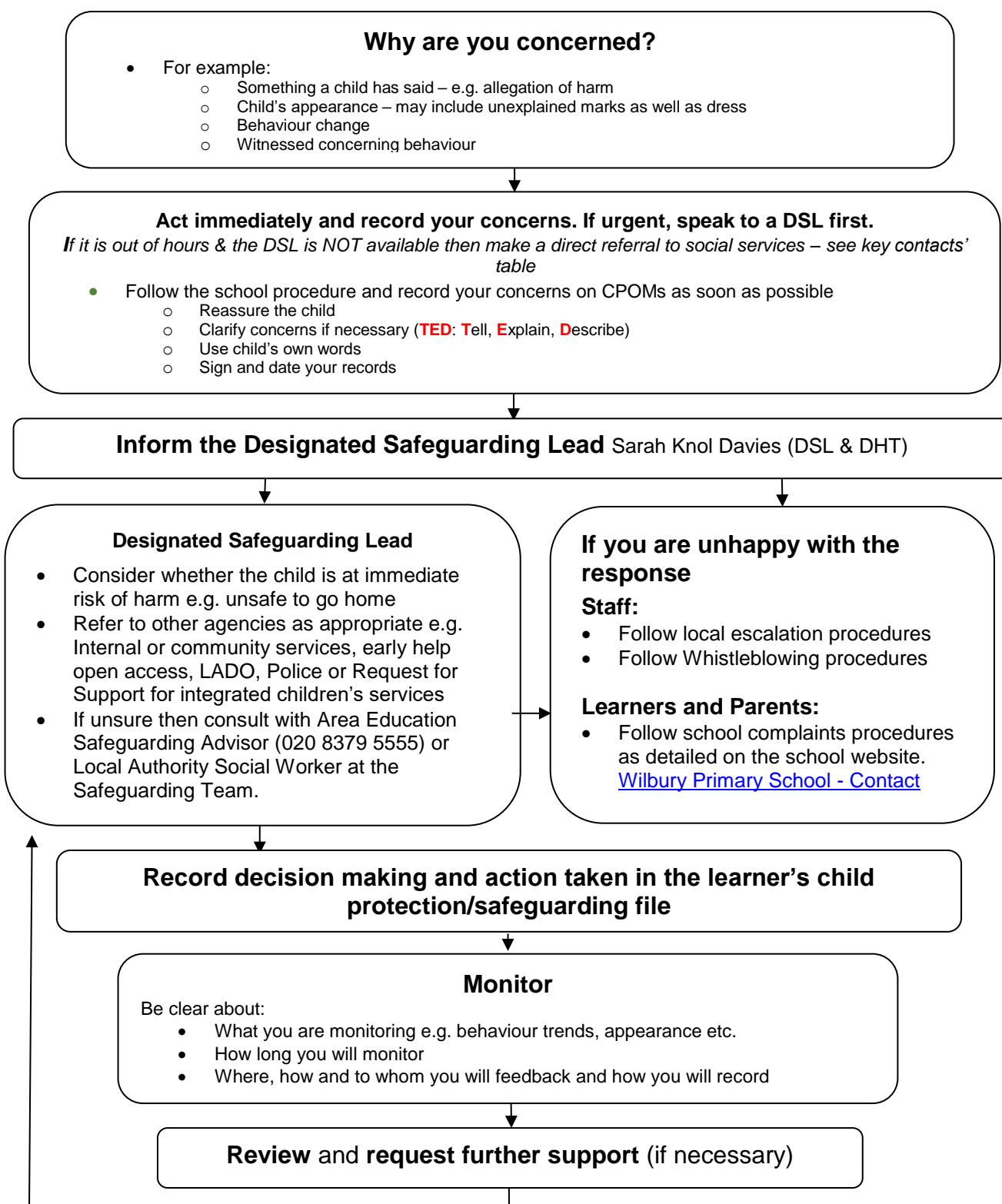
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### 1. Key Contacts

Post	Postholder	Contact details
<b>Headteacher / Head of School</b>	Lisa Wise	Tel No 02088075335 Email address lwise@wilbury.enfield.sch.uk
<b>Designated Safeguarding Lead (DSL)</b>	Sarah Knol Davies	Tel No 02088075335 Email address sknoldavies@wilbury.enfield.sch.uk
<b>Deputy Safeguarding Lead (DDSL)</b>	Ferdiye Hassan	Tel No 02088075335 Email address fhassan@wilbury.enfield.sch.uk
<b>Deputy Safeguarding Lead (DDSL)</b>	Sophie Chaloner	Tel No 02088075335 Email address schaloner@wilbury.enfield.sch.uk
<b>Chair of Governors and Link Governor for Safeguarding</b>	Katie Bonham Carter Emma Wolanski	<a href="mailto:k.bonhamcarter@hallschool.co.uk">k.bonhamcarter@hallschool.co.uk</a> <a href="mailto:emma.wolanski@gmail.com">emma.wolanski@gmail.com</a>
<b>Local Authority Designated Officer (LADO)</b>	Cathy Phelan	<b>Phone:</b> 020 8489 2968 <b>Email:</b> Following an initial conversation, you must complete a referral form and return it to <a href="mailto:safeguardingservice@enfield.gov.uk">safeguardingservice@enfield.gov.uk</a> and <a href="mailto:MPESupport.SCS@enfield.gov.uk">MPESupport.SCS@enfield.gov.uk</a> <b>Website:</b> <a href="#">LADO (Local Authority Designated Officer)   Enfield Council</a>
<b>Prevent referrals and advice</b>	<b>Contact the Prevent team:</b> <a href="mailto:prevent@enfield.gov.uk">prevent@enfield.gov.uk</a> Act Early website: <a href="#">ACT Early   Prevent radicalisation</a> ACT Early Support Line on 0800 011 3764	
<b>Enfield Safeguarding Children Partnership</b>	<a href="#">Enfield Safeguarding Children Partnership   Safeguarding Enfield</a>	
<b>Enfield Council's Children's Services</b> Please only use the out of hours number if you are calling outside of normal working hours. Your call will be logged and the operator will take brief details. An out of hours social worker will ring you back.	<b>Child at risk of immediate harm:</b> Phone: 020 8379 5555 <i>Monday to Thursday: 8.45am to 5pm; Friday: 8.45am to 4.45pm</i> <b>NO immediate risk of harm to a child:</b> If you are a professional or volunteer working with a child or their family and there is no immediate risk of harm to the child, but the family would benefit from additional support, you should complete the online referral form via this link: <a href="#">Make a referral</a> <b>Out of office hours</b> , including weekends: <b>020 8379 1000 (select option 2 and you will be transferred to an advisor). You can also email <a href="mailto:childrensmash@enfield.gov.uk">childrensmash@enfield.gov.uk</a>.</b> <i>Do not use this number if a child needs immediate assistance from the Police or Ambulance Services. In these cases, call 999</i> <b>Child Protection Advisors:</b> 020 8379 5555	
<b>Making a MASH referral</b>	<b>Contact the multi-agency safeguarding hub (MASH)</b> Phone: 020 8379 5555 <i>Out of hours: 020 8379 1000</i> During your phone call (above) if you are a professional working with children you may be asked to complete an online <b>MASH referral form</b> within 24 hours. This should be emailed securely to: <a href="mailto:childrensmash@enfield.gov.uk">childrensmash@enfield.gov.uk</a>	

## 2. What to do if you have a welfare concern in Wilbury Primary School



At all stages, the child's circumstances will be kept under review  
The DSL/Staff will request further support if required to ensure the **child's safety is paramount**

### 3. Introduction and Ethos

- **The purpose of this policy is:**
  - To protect the safety, welfare and well-being of the pupils on roll at our school
  - To set out the school's overarching principles, approaches and systems to child protection and safeguarding across all aspects of school life.
  - To ensure staff are aware of their statutory safeguarding duties and responsibilities
  - To ensure staff are well-equipped and confident to recognise and report child protection concerns
  - To promote an open and listening culture where everyone can voice concerns in the knowledge they will believe, helped and supported.
- **Our core safeguarding principles are:**
  - **Promotion**
    - making sure pupils, parents, staff and all adults that come into contact with children know the systems and the support in place to keep children safe and there is a culture of vigilance permeating across the school
  - **Prevention**
    - positive, supportive, vigilant, open and safe culture. Well taught curriculum that includes relationships and online safety, pastoral opportunities for children and safer recruitment procedures
  - **Protection**
    - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
  - **Support**
    - for all learners, parents and staff, and where appropriate specific interventions that are required for those who may be at risk of harm.
  - **Working with parents and other agencies**
    - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- Wilbury Primary School recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- Staff and other adults working with children at Wilbury Primary School are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Wilbury Primary School believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Wilbury Primary School recognises the importance of safeguarding and the promotion of children's welfare at all times. Safeguarding is embedded in all the school's processes and procedures and at the heart of our school to provide an ethos and environment that will help children to be safe and feel safe. In our **school** children are respected and encouraged to talk openly. All our staff understand safe professional practice and adhere to our safeguarding policies.
- Wilbury Primary School expects that if any member of our community has a safeguarding concern about any child or adult, they should act immediately. This includes out of hours when the DSL may not be available to speak to, in which case a direct referral should be made to social services – see contact details at the start of this policy.
- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2025 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2025

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### 4. Legislation and guidance

- This policy has been developed in accordance with the principles established by the Children Acts [1989](#) and [2004](#) and related guidance. The guidance includes:
  - [Keeping Children Safe in Education 2025](#)
  - [Working together to safeguard children](#) (December 2023, last updated June 2025)
  - [Behaviour in schools](#) (February 2024)
  - [Children’s social care national framework](#) (December 2023, last updated July 2025)
  - [Early Years and Foundation Stage Framework \(EYFS\)](#) (July 2025)
  - [Framework for the Assessment of Children in Need and their Families](#) (2000)
  - [Generative artificial intelligence \(AI\) in education](#) (June 2025, updated August 2025)
  - [Information sharing for safeguarding practitioners](#) (April 2024)
  - [Meeting digital and technology standards in schools and colleges](#) (March 2022, last updated March 2025)
  - [Multi-agency statutory guidance on female genital mutilation](#) (July 2020)
  - [Ofsted: Education Inspection Framework’ 2019](#) (revised July 2023)
  - [Ofsted: School inspection handbook](#) (last updated September 2024) [School inspection toolkit](#)
  - [Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension](#) (March 2024, last updated July 2025)
  - [Relationships and sex education \(RSE\) and health education](#) (June 2019 and updated July 2025)
  - [Sharing nudes and semi nudes advice for education settings working with children and young people](#) (March 2024)
  - [Sharing nudes and semi-nudes: how to respond to an incident \(overview\)](#) (March 2024)
  - [The Education \(Independent School Standards\) Regulations](#) (2014)
  - [The Non-Maintained Special Schools \(England\) Regulations 2015](#)
  - [The Prevent Duty Guidance](#) (published September 2023 and came into force on 1 January 2024)
  - [Working together to improve attendance](#) (August 2024 - statutory for 2025)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- Other legislation this policy is based on:

Legislation	What it covers
School Staffing (England) Regulations 2009	<ul style="list-style-type: none"> <li>• Lists what must be recorded on the single central record</li> <li>• The requirement for at least one person conducting an interview to be trained in safer recruitment techniques.</li> </ul>
Children’s Act 1989 (and 2004 amendment),	<ul style="list-style-type: none"> <li>• Provides the framework for the care and protection of children.</li> </ul>
Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015 (Section 5B(11))	<ul style="list-style-type: none"> <li>• Places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.</li> </ul>
The Marriage and Civil Partnership (Minimum Age) Act 2022	<ul style="list-style-type: none"> <li>• Officially came into force on 27 February</li> <li>• This Act prohibits 16 and 17-year-olds from marrying or entering into a civil partnership, regardless of whether they have parental consent.</li> <li>• Also an offence to cause a child to marry before 18<sup>th</sup> birthday, also applies to non-binding unofficial marriage.</li> </ul>
Rehabilitation of Offenders Act 1974	<ul style="list-style-type: none"> <li>• Sets out when people with criminal convictions can work with children.</li> </ul>
Schedule 4 of the Safeguarding Vulnerable Groups Act 2006	<ul style="list-style-type: none"> <li>• Defines what ‘regulated activity’ is in relation to children</li> </ul>

### 5. Human Rights, Equalities and Public Sector Equality Duty

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- Wilbury Primary School is aware of its obligations under the Human Rights Act 1998 (HRA), Equality Act 2010 (including its Public Sector Equality Duty) and the local multi-agency safeguarding arrangements in Enfield and all other local authorities that pupils may reside in.
- The governing body and senior leaders recognise that, under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:
  - Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
  - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
  - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
  - Protocol 1, Article 2: protects the right to education.
- The governing body and senior leaders recognise being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.
- The governing body and senior leaders will adhere to the Equality Act, will not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- The governing body and senior leaders will pay due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, the governing body and senior leaders will give specific consideration to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

### 6. Related Safeguarding Policies

- This policy is one of an integrated suite of policies, reflecting the whole school approach to safeguarding. It should be read and actioned in conjunction with the policies as listed below:
  - Anti-Bullying (*covered in behaviour policy*)
  - Artificial intelligence (AI) policy
  - Attendance Policy
  - Behaviour Policy
  - Curriculum Guidance
  - Cyber security (*covered in safeguarding policy*)
  - Data protection and Information sharing
  - First aid and managing medical needs
  - Health and safety, may include use of premises by other organisations
  - Managing/dealing with allegations against staff policy and procedures, must cover both allegations that cross the threshold of harm and low-level concerns, also dealing with concerns against supply teachers and link back to code of conduct if allegation is unsubstantiated.
  - Online safety including clarity in the leadership of online safety, acceptable use of technology policy/policies (AUP), filtering and monitoring, use of images, references to social media (maybe in a separate policy) opportunities to teach about online safety and reference to cyberbullying. Some reference should also be used to the school's use of generative AI and how the school will ensure pupils' safeguarding and protect their data. Procedures for filtering and monitoring should also be included. See KCSIE para 137 and Appendix 7 of this model policy.
  - Personal and intimate care guidance
  - Personal, social and health education (PSHE) may cover wider opportunities to teaching about safeguarding - revised in 2025-2026 to meet revised statutory guidance (*covered in Curriculum Guidance*)
  - Relationships and Sex Education (RSHE) (*covered in Curriculum Guidance*)

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- Risk assessments (e.g. school trips, use of technology) *(covered in Educational Visits & Online Safety)*
- Safer recruitment *(covered in Safeguarding Policy)*
- Searching, screening and confiscation *(covered in Behaviour policy)*
- Social media and Mobile technology *(covered in Online Safety policy)*
- Special educational needs policy
- Code of Conduct
- Staff disciplinary policy/procedures *(covered in Staff grievance & Complaints policy)*
- Use of physical restraint *(covered in Behaviour policy)*
- Whistleblowing

### 7. Definitions of safeguarding

- In line with KCSIE 2025, safeguarding and promoting the welfare of children is defined for the purposes of this policy 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 the 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
- Safeguarding is what we do to prevent children suffering or coming to harm, whether that is within or outside the home, including online.
- Child protection refers to activities undertaken by the school to protect children suffering from harm or likely to suffer from harm. A child includes anyone under the age of 18.
- The safeguarding partners that the school works with to safeguard its pupils as set out in KCSIE are: the local authority; the local clinical commissioning group; and the chief officer of Police for the area that falls under the local authority.
- Abuse is a form of maltreatment of a child that covers inflicting harm or failing to prevent the infliction of harm. Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and psychological needs. Exploitation is the deliberate manipulation or abuse of power used to have control over another person, usually for some form of gain - this can be for a range of reasons including personal, financial or sexual.

At Wilbury Primary School we are aware that abuse, neglect and exploitation can take place inside and outside the school, inside or outside the home, and online.

*Section 8 and Appendix 1 provides a more detailed explanation of the different types of abuse and signs and symptoms and specific safeguarding issues.*

- At Wilbury Primary School we recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. We also think carefully about the use of the term '**alleged perpetrator(s)**' and where appropriate '**perpetrator(s)**', 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. In managing any incident, we are prepared to use any term with which the individual child is most comfortable and on a case-by-case basis.

### 8. Informing staff and others of safeguarding policy

- All staff (including temporary staff and volunteers) will be provided with a copy of this policy. They will be asked to say they have read and understood its contents, are familiar with the school systems and will adhere to them. The policy is available on the school shared drive, school website and on display in the staff room.
- Visitors to the school site will be given a leaflet detailing our safeguarding arrangements, which also covers fire safety, first aid and health & safety. Visitors will be asked to sign to say they have read, understood and will adhere to these arrangements.
- Parents/carers can obtain a copy of the Wilbury Primary School Safeguarding and Child Protection Policy downloaded from the school website together with other related policies, including for online safety,

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recruitment and child-on-child abuse. [Wilbury Primary School - Home](#). Additionally, these and other policies are available from the school office on request.

- Pupils will be made aware of the school's systems in age-appropriate ways through displays around the school site, verbally and via the school website. The DSL will ensure pupils have understood and are aware that they can raise concerns at any time, they will be listened to, taken seriously and their wishes respected (where possible), given the necessary support and kept informed of actions being taken.

### **9. Roles and Responsibilities**

#### **The Governing Body**

- The Governing Body takes responsibility for strategic leadership that is a 'whole school approach' for the school's safeguarding arrangements and that these will comply with their duties under legislation and have full regard to KCSIE 2025. This includes ensuring the school's policies, procedures and training are effective and comply with the law at all times.
- The Governing body will ensure the school's systems enable pupils to report what is happening to them.
- The Governing body will ensure the appointed Designated Safeguarding Lead is a senior member of staff. The role of the Designated Safeguarding Lead (and deputies) is set out in KCSIE Annex C, summarised in the section below and will be made explicit in the job description of postholders.
- Wilbury Primary School has a nominated governor for safeguarding. The nominated governor(s) will support the Designated Safeguarding Lead and have oversight in ensuring that the Wilbury Primary School has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- All governors will undertake safeguarding training and additional training on specific issues, such as online safety and Prevent. This will be part of ongoing and regular programme of training to build knowledge and understanding of safeguarding across all members of the Governing Body.
- The governing body will take an active role in monitoring safeguarding arrangements and providing support to the Designated Safeguarding Lead in line with Part 2 KCSIE 2025. This will include visits to school, regular contact with the Designated Safeguarding Lead and other staff working to protect children and reviewing information provided to them concerning pupils' welfare and safety, including for online safety. Governors will also seek the views of pupils and parents/carers as part of their monitoring arrangements to check on the effectiveness of safeguarding arrangements.
- The governing body and leadership team at Wilbury Primary School recognises the significant level of responsibility of the Designated Safeguarding Lead role. They will ensure the postholder (and any deputies) are given the additional time, funding, training, resources, and support needed to carry out the role effectively. They will also ensure there is adequate cover if the Designated Safeguarding Lead is absent.

#### **Headteacher**

- The Headteacher/Principal will ensure that the suite of policies and procedures relating to safeguarding and child protection adopted by the school's Governing Body/Board of Trustees are understood and followed by all staff.

#### **Designated Safeguarding Lead (DSL)**

- The school has appointed a member of the leadership team (Sarah Knol Davies, Deputy Head Teacher) as the Designated Safeguarding Lead (DSL). Additionally, the school have appointed Deputy DSLs (Ferdiye Hassan, Community Development Manager) who will have delegated responsibilities and act in the DSLs absence.
- Wilbury Primary School has a Safeguarding Team which is structured as follows: DSL, DDSL, SENDCo, and a further 5 DDSLs who have delegated responsibilities and act in the DSL/DDSL's absence.
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems in Wilbury Primary School. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- Job descriptions that align to KCSIE 2025 Annex C are in place for the DSL and deputy DSLs and listed in full in Appendix 2. See Appendix 2 for the full job description of the DSL and DDSLs as set out in KCSIE Annex C. The prime roles and responsibilities of the DSL and DDSLs are to

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- Manage and deal with reports of concerns from staff and other sources and manage referrals to local authority children's social care, Channel programme, the Disclosure and Barring service and to the Police where a crime may have been committed
- Working with others
- Information sharing and managing the child protection file
- Raising awareness
- Training, knowledge and skills
- Providing support to staff
- Understanding the views of children
- Holding and sharing information
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSL and any deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- The Headteacher will be kept informed of any significant issues by the DSL.
- The DSL and DDSLs will be given the additional time, funding, training, resources and support they need to carry out the role effectively. This may include handling of referrals to children's social care and multi-agency working, together with other training pertinent to the school's context and evolving safeguarding issues.
- The DSL will provide advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.
- The DSL will ensure that all staff receive the necessary safeguarding training, and that this will be regularly updated to ensure currency and keep the profile of safeguarding high.
- During term time the designated safeguarding lead (or a deputy) will always be available (during school/office hours) for staff in the school to discuss any safeguarding concerns. This will be in person, in very exceptional circumstances this may be by telephone. The school website signposts the DSL email address that is monitored outside of school hours/during school holidays: [Wilbury Primary School - Contact](#). The school will inform parents of the out of hours reporting arrangements and cover arrangements for out of hours and out of term activities.

### **Members of Staff**

- All members of staff have a responsibility to:
  - Provide a safe environment in which children can learn.
  - Be aware it can happen here, and safeguarding is everyone's responsibility.
  - Build trusted relationships with children and young people that facilitates communication.
  - Undertake appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction and ongoing regular updates as required, and at least annually, so that have the relevant skills and knowledge to safeguard children effectively.
  - Actively promote the welfare and safeguarding of pupils, including their online safety,
  - Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
  - Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
  - Be aware of indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home and online.
  - To exercise professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect to identify cases of children who may be in need of help or protection.
  - Reassure a child that they are being taken seriously and that they will be supported and kept safe; never give the child the impression that they are creating a problem by reporting any form of abuse and/or neglect; and never make a child feel ashamed for making a report.

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- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- Understand the early help process and their role in it.
- Understand the school's safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- Know how to maintain an appropriate level of confidentiality and the importance of recording and information sharing.
- Understand the wider definitions of child-on-child abuse and be aware of specific issues such as cyberbullying, sexual violence, sexual harassment and exploitation as set out in KCSIE Part 1 or Annex A (for some staff) and Annex B.
- Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
- Be aware of the school's child-on-child abuse policy, anti-bullying strategy and the role they play in preventing and responding to child-on-child abuse.

### **Children and Young People**

- Children and young people (learners) have a right to:
  - Feel safe, be listened to, know their concerns will be taken seriously, and have their wishes and feelings taken into account.
  - Contribute to the development of school safeguarding policies.
  - Receive help from a trusted adult.
  - Learn how to keep themselves safe, including online.

### **Parents and Carers**

- Parents/carers have a responsibility to:
  - Understand and adhere to the relevant school policies and procedures.
  - Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
  - Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the school or other agencies.
  - Speak to school staff if they have any concerns about the welfare, well-being and safety of their children.

## **10. Recognising Indicators of abuse, neglect and exploitation**

- All staff at Wilbury Primary School are made aware of the definitions and indicators of abuse, neglect and exploitation (see below and Appendix 1), as identified by Working Together to Safeguard Children (December 2023) and Keeping Children Safe in Education (KCSIE) 2025.
- All staff understand that children can be at risk of harm inside and outside of the school, inside and outside of home and online. All staff, but especially the DSL (and deputies) must take account of the context within which such incidents and/or behaviours occur and consider whether children are at risk of abuse or exploitation in situations outside their families.
- Harm can also 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.
- Wilbury Primary School recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
  - Physical abuse
  - Sexual abuse

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- Emotional abuse
- Neglect

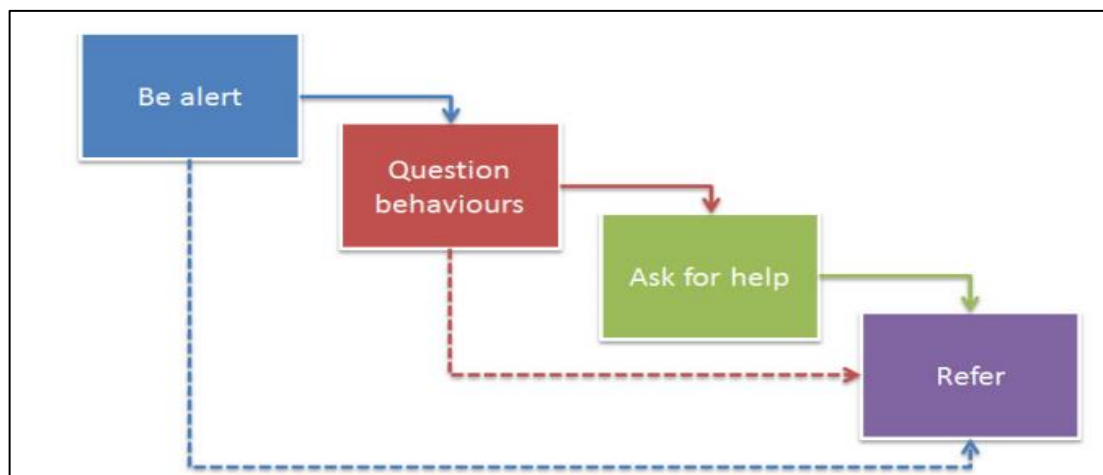
The school recognises that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

For further information see Appendix 1 of this policy and Appendix 4 for links to advice and support.

- All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. A wider range of specific issues includes (but not limited to):
  - Child abduction and community safety incidents
  - Children with family members in prison
  - Children absent education (CAE)
  - Child missing/goes missing from education, home or care
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation (CCE)
  - County Lines
  - Cybercrime
  - Domestic abuse
  - Faith based abuse
  - Female Genital Mutilation (FGM)
  - Forced marriage
  - Gangs and youth violence
  - Gender based abuse and violence against women and girls
  - Homelessness
  - Honour based abuse (so called)
  - Mental health
  - Modern slavery & the National Referral Mechanism
  - Online safety (including awareness of the school's systems for filtering and monitoring)
  - Child-on-child abuse (including cyberbullying, racial, prejudicial and discriminatory bullying)
  - Preventing radicalisation and extremism
  - Relationship abuse
  - Serious Violence
  - Sexual Violence and Sexual Harassment
  - Upskirting
  - Youth produced sexual imagery, nudes/semi-nudes ("Sexting")
- Additional information on these safeguarding issues and information on other safeguarding issues is included in KCSIE Annex B and Appendix 3 of this policy.
- Members of staff are aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.
- **All** staff, but especially the designated safeguarding lead (and deputies) should 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), criminal exploitation, serious youth violence, county lines, and radicalisation.
- **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and explored by the DSL on a case-by-case basis.

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- All members of staff are expected to be aware of and follow this approach if they are concerned about a child (taken from 'What to do if you are worried a child is being abused' DfE 2015)



- Parental behaviours' may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children offsite. Children can be 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 exploitation, criminal exploitation, and serious youth violence.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy.**

### 11. Child protection procedures – taking action

- Wilbury Primary School adheres to the Enfield Safeguarding Children multi-agency partnership procedures. The full LA procedures and additional guidance relating to specific safeguarding issues can be found here [Enfield Safeguarding Children Partnership | Safeguarding Enfield](#) on the LA Safeguarding Children Partnership website.
- Staff (volunteers, governors, contractors, agency and supply staff and visitors) must follow the school procedures set out in this and the following sections should they identify or have a worry about a child protection issue. The actions staff and other adults should take if there are any safeguarding concerns about a pupil are listed below. This will be covered in staff training, including new staff induction. Visitors will be provided with an information sheet on arrival, summarising the school systems and how they should pass on any child protection concerns. If anyone is unsure about reporting concerns, they must speak to the DSL and they can also refer to the DfE publication 'What to do if you're worried a child is being abused' (March 2015).
- All staff are made aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Wilbury Primary School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

#### Action if a child is in immediate danger or suffering harm or likely to suffer harm

- As soon as a member of staff or adult working in the school becomes aware that a child is suffering or likely to suffer harm, or in immediate danger they must let the DSL know immediately.
- The member of staff must make a record of what the child (ideally contemporaneously) is telling them/has told them and also record this on CPOMs as soon as possible after the alert to the DSL. The handwritten record should be scanned and added to the electronic record (see details under making a record of a concern).
- The DSL, along with the relevant Deputy DSLs will review the case and decide on the next steps. If a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Enfield Multi-Agency Safeguarding Hub (MASH), and/or the police. Referrals will follow the [Make a referral](#) referral

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procedures and the expectations set out in KCSIE and in Chapter 3 section 3 of ['Working Together to Safeguard Children'](#) 2023.

- **If the DSL or deputy DSL is not available, for example out of school hours, then any staff member or other adults can make a referral.** The contact numbers for the MASH team are listed at the front of this policy. During this call you should seek the advice about notifying parents, remembering that in some situations this could be unsafe or cause the child more harm. During your phone call if you are a professional working with children you may be asked to complete a **MASH referral form** within 24 hours. This should be completed securely using the [Make a referral](#) section on the LA website.
- Any member of staff/adult making a **direct referral to the MASH team** must inform the DSL as soon as possible, verbally and provide a written record of the concerns and actions taken.

### Action if a concern about a child is not in immediate danger or risk

- Staff must be vigilant at all times. In doing this staff may well notice safeguarding concerns that do not place a child at immediate risk of harm. Staff must be mindful that no concern is too small not to share and that they are vital in helping the DSL to build a picture of the child's well-being, welfare, mental health and safety and take the necessary action. Examples of concerns could be a child looking unkempt, saying or making a comment that arouses your suspicions or a change in character/behaviour.
- Staff must follow school procedures and record the concern on CPOMs. The DSL will ensure that there is continuous monitoring of the CPOMs throughout the day so no concerns are missed and any necessary actions are taken. The member of staff should not hesitate in also discussing their concern with the DSL or deputy DSL. The DSL will review this information, with any other safeguarding concerns they have on record, and take any necessary actions.

### Guidance on receiving a disclosure from a child

Staff should follow this approach:

- Listen to what the child has to say. Allow them time to talk freely and do not ask leading questions. Reassure the child that they are doing the right thing in telling you. Let them know they are being taken seriously and that nothing they say is or will cause a problem. Do not tell them they should have told you sooner.
- Stay calm and do not show that you are shocked or upset. Do not in any circumstance promise to keep what they have told you a secret. Explain you will have to pass this information on and what will happen next.
- If possible, make a handwritten record as the child speaks. If this is not possible, make a handwritten record as soon as possible afterwards. Follow the school procedure to also make a report on CPOMS.
- Speak to a DSL or deputy DSL immediately if the child is in **immediate risk** or **has been harmed** as noted above.
- Under no circumstances should the staff member undertake any investigation into the concern.
- Any allegations about staff must be reported directly to the headteacher, or in their absence, a deputy headteacher, unless the allegation is against the headteacher in which case the chair of governors should be informed. See later section.

### Making a record of a concern or disclosure

- Any child protection concerns should be entered into CPOMs. If the concern is a direct disclosure from a child then this should be recorded in writing so there is a contemporaneous record of the disclosure, which can be used as evidence should a case go to court. Ideally, this should be recorded directly on CPOMs, or on school forms which can be found in the school office. The start, end time, location and date should be added to the report. A summary of the report should be made on CPOMs and the DSL or deputy informed immediately.

## 12. Notifying parents and carers of child protection concerns

- Parents/carers will be informed of child protection concerns unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation. Such discussions will be undertaken by the DSL or deputy DSL, although this may be delegated to another member of staff who is part of the safeguarding team, and maybe already working in with the family.
- The DSL will liaise with the LAs Multi-Agency Safeguarding Hub (MASH), before making a decision not to inform parents/carers of a child protection concern.

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- In the event of a request for support to the LA's Multi-Agency Safeguarding Hub (MASH) being necessary. Parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by the LAs Multi-Agency Safeguarding Hub (MASH).
- Parents/carers will normally be notified in the case of allegations of abuse made against other pupils, unless it is unsafe to do so. The same applies to the person(s) the allegation is made against if they are a child.

### **13. Multi-Agency Working**

- Wilbury Primary School recognises and is committed to its responsibility to work within the LA multi-agency safeguarding (MASH) arrangements. The leadership team and DSL and DDSLs will work to establish strong and co-operative local relationships with professionals in the safeguarding partners and other agencies and sources of support in line with statutory guidance.
- The school recognises the importance of multi-agency and partnership working and is committed to working alongside all agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to LA processes as required. Such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

### **14. Early Help assessment & statutory children's social care assessments and services**

#### **Early Help**

- Wilbury Primary School will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.
- Wilbury Primary School, in line with Working together to safeguard children (2023), recognises the importance of early recognition and intervention in safeguarding children. The school follows the guidance in paragraph 131 of Working Together to safeguard children in conducting effective early help assessments.
- Staff are trained to be alert to the potential for early help, identify children that may benefit from early help and raise their concerns with the DSL. For example, a child who:
  - is disabled or has certain health conditions and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - is frequently missing/goes missing from education, home or care
  - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
  - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
  - is at risk of being radicalised or exploited
  - 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 so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
  - is a privately fostered child.
- If the DSL views that an early help assessment is appropriate, they or the deputy DSL will lead on liaising with other agencies and in setting up inter-agency assessment, as require. Staff may be required to contribute and/or provide support in the early help assessment. They will ensure the appropriate early help support is put in place to support the child.
- The DSL will keep all early help cases under constant review and consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves. If, after the request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will take further actions. This may include a request for advice and support to LA Multi-Agency Safeguarding Hub (MASH).

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### Statutory social care assessments

- At Wilbury Primary School if a child is suffering or is likely to suffer from harm we will immediately make a referral to LA Multi-Agency Safeguarding Hub (MASH) (and if appropriate the police).
- Referrals will follow the local referral process and the expectations set out in KCSIE and in Chapter 3 section 3 of '[Working Together to Safeguard Children](#)' 2023.
- A children's social care assessment will consider where children are being harmed in contexts outside the home. As part of the referral, we will provide as much information as possible so that all the available evidence is considered to enable a contextual approach to address such harm.
- At Wilbury Primary School we will ensure we do all we can to support the assessment and, if the child's situation does not appear to be improving, follow the LA's escalation procedures.

## 15. Confidentiality, information sharing and record keeping

### Confidentiality

- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.
- All staff must be aware that they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.
- The Headteacher/Principal or DSL (and DDSL and members of the safeguarding Team) will share information about a child on a 'need to know' basis to help maintain confidentiality.
- Confidentiality is also addressed in this policy with respect to record-keeping below and allegations of abuse against staff in the section below and in the school's policy.

### Information Sharing

- Wilbury Primary School recognises our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2025 and the DfE Guidance on [Information Sharing](#) (May 2024). This is important because information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting children's welfare, including in relation to educational outcomes.
- The safety of the child is always paramount, any concerns about sharing information must not be allowed to stand in the way of ensuring the welfare and safety of pupils.
- Staff should never promise a student that they will not pass on child protection concerns to the relevant staff and agencies. However, the child should be reassured that:
  - their disclosure will be taken seriously, and it is not creating a problem
  - their disclosure will only be shared with relevant staff
  - staff will be sensitive to their feelings and concerns
  - their wishes will be heard
  - they will be kept informed of actions and support.
- The Data Protection Act 2018 and UK GDPR 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. The school may legitimately share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.
- Wilbury Primary School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. Steve Durbin: [steve.durbin@excathedra.solutions](mailto:steve.durbin@excathedra.solutions)
- DfE Guidance on [Information Sharing](#) (May 2024) provides further detail. The 7 'golden rules' for sharing information, and can support staff who have to make decisions about sharing information, These are kept in the main office, staff room and any shared areas on the staff network.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputies).

### Record keeping

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing contemporaneously (this may be used as evidence if the disclosure becomes a Police matter) on

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the school safeguarding CPOMs and passed without delay to the DSL. This should include speaking to the DSL. A body map will be completed if injuries have been observed. This is recorded directly on CPOMs.

- Records must be completed at the time using the child's words and shared as soon as possible after the incident/event. The record must be signed and dated by the member of staff. If there is an immediate concern the member of staff should consult with a DSL before completing the form as reporting urgent concerns takes priority. 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
  - the rationale for decisions, including referrals and when referrals were not made.
- If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL (an DDSLs). Safeguarding records are shared with staff on a 'need to know' basis only.
- Records will also be kept of any telephone calls, meetings or other communications for each child to build a full and detailed chronology. This may include other school records, such as first aid, medical treatment if the child is unwell, attendance and punctuality and behaviour.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school in advance of a child leaving. For example, information that would allow the new school to continue to provide support.

### 16. Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of part one of KCSIE (2025) (or for at the discretion of the Governing Body Annex A instead) which covers safeguarding information for all staff.
  - School leaders, including the DSL will read the entire KCSIE document.
  - School leaders and all members of staff who work directly with children will also be expected to read Annex B within KCSIE 2025.
  - All members of staff have signed to confirm that they have read and understood KCSIE Part One (or Annex A) and Annex B. A record of this is maintained by the office manager.
- **All** staff are expected to be aware of systems within their school which support safeguarding. This will be explained to them as part of staff induction and updated on a regular to ensure they are fully aware of current practice. This includes:
  - safeguarding and child protection policy, which should amongst other things also include the policy and procedures to deal with child-on-child abuse or a signpost to this
  - behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)–
  - safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
  - staff behaviour policy (often known as code of conduct) – this should include low-level concerns, allegations against staff and whistle blowing.
  - role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- The school aims to keep the profile and importance of safeguarding high with staff, pupils, parents, governors/trustees, visitors and other adults who are associated or work with the school.
- All staff members (including agency and third-party staff) will receive appropriate child protection training to ensure they are aware of a range of safeguarding issues. Basic child protection training will take place annually including online safety training which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

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- In addition, a range of other specific safeguarding issues have been prioritised by leaders as most pertinent to the school. This includes training in Prevent, mental health, child-on-child abuse, domestic violence anti-bullying strategies and sexual harassment.
- All staff will receive regular safeguarding and child protection updates, for example, via Safeguarding monthly emails and regular safeguarding training update staff meetings, to provide them with relevant skills and knowledge to safeguard children effectively.
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training including in online safety, behaviour management and the staff code of conduct to ensure they are aware of the school internal safeguarding processes as part of their induction.
- All staff members (including volunteers, agency and third-party staff) will be made aware of the **school** expectations regarding safe and professional practice via the staff code of conduct, Acceptable Use Policy (AUP), online safety and AI policy.
- Staff will be encouraged to contribute to and shape school safeguarding arrangements and child protection policies. Heads of Department will have regular opportunities to raise any issues causing concern or suggestions from their respective departments. The core Safeguarding team, including the SENDCo will meet weekly to discuss concerns/suggestions.
- The DSL and Headteacher will provide regular reports to the governing body detailing safeguarding training undertaken by all staff and will maintain up to date register of who has been trained.
- Although the school has a nominated lead(s) for the governing body all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

### **17. Safer Working Practice**

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school code of conduct. Helpful guidance (updated in February 2022 and supported by the DfE) can be found on the Safer Recruitment Consortium website [Home \(saferrecruitmentconsortium.org\)](https://www.saferrecruitmentconsortium.org).
- Staff will be made aware of Wilbury Primary School behaviour management policy and 'use of reasonable force' guidance, and that any physical interventions/use of reasonable force must be in line with agreed policy and procedures and DfE guidance - see section 31 below.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking) and the use of generative AI in their work. Staff will adhere to relevant school policies including staff behaviour policy, Acceptable Use, online safety policies, social media and policies relating to pupils' health and safety.

### **18. Staff Supervision and Support**

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Practical and/or emotional support may be requested confidentially from the Education Support organisation which is financed by the school. Staff can also approach organisations such as their Union or other similar organisations directly.
- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) (September 2025).

### **19. Online safety**

- It is recognised by Wilbury Primary School that the use of technology presents challenges and risks to children and adults both inside and outside of school. As a school we will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate

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any incident where appropriate. The school sees technology and its use permeating all aspects of school. Our integrated approach to online safety is set out in detail in:

- Online safety policy
- Artificial intelligence use policy
- Mobile phone and social media policy
- Use of images policy
- Remote learning policy
- Threaded through other policies, including policies for the curriculum, subject teaching, behaviour, child-on-child abuse and RSE/PSHE.
- Role and responsibilities of the DSL
- Parental engagement policy
- The school identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk as set out in KCSIE:
  - **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
  - **contact:** being subjected to harmful online interaction with other users; 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 nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying,
  - **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If staff feel pupils, students or staff are at risk, it should be reported to the Anti-Phishing Working Group (<https://apwg.org/>) and to the DSL.
- The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff. The Computing Coordinator, Mr N. Gray, will attend the weekly safeguarding update meetings monthly alongside the DSL, DSL Deputy, and SENDCo on the last Monday morning of each month. This provides a forum for him to raise any concerns which have arisen with regards to the school filtering and monitoring processes, plus a chance to discuss any issues of concern to the group.
- Wilbury Primary School uses a wide range of technology. This includes computers, laptops, tablets, Chromebooks, the internet, our learning platform (Teams), email systems, messaging systems, generative artificial intelligence (TeachMate AI), and other digital devices and systems. All school owned devices and systems will be used in accordance with our acceptable use policies and with school's appropriate safety and security measures in place.
- Wilbury Primary School recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras. In accordance with KCSIE 2025 and EYFS 2025 has appropriate policies in place that are shared and understood by all members of the community. Further information regarding the specific approaches relating to this can be found in our online safety policy and code of conduct, which can be found in the staff room, staff intranet and website.
- Wilbury Primary School will do all we reasonably can to limit children's exposure to online risks through our school IT systems and will ensure that appropriate filtering and monitoring systems are in place and that these meet the DfE [standards for filtering and monitoring](#) (March 2025). These are:
  1. identify and assign roles and responsibilities to manage filtering and monitoring systems
  2. review filtering and monitoring provision at least annually
  3. block harmful and inappropriate content without unreasonably impacting teaching and learning
  4. have effective monitoring strategies in place that meet their safeguarding needs, which also covers use of generative artificial intelligence.
- To ensure we meet the standards for filtering and monitoring, we will:
  - consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks
  - be informed in part, by the risk assessment required by the Prevent Duty

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- ensure the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified
- inform all users that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.
- require pupils, staff and visitors if they discover unsuitable sites or material,
  - to follow the school procedures: Staff to turn off the monitor/device in question
  - report the concern immediately to a member of staff
  - report the URL of the site to technical staff/services
- record and report to the DSL and appropriate technical staff, any filtering breaches or concerns identified through our monitoring approaches.
- immediately report any access to material believed to be illegal to the appropriate agencies, such as the [Internet Watch Foundation](#) and the Police.
- ensure that in implementing appropriate filtering and monitoring - “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding
- ensure any use of generative artificial intelligence is covered by the school's filtering and monitoring systems
- regularly check the effectiveness of the filtering and monitoring systems. The school monitors the SENSO alerts daily to ensure all concerns are dealt with in a timely manner.
- review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.
- Wilbury Primary School acknowledges that whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety. Strategies will include:
  - Pupils will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
  - Pupils' internet use will be supervised by staff according to their age and ability.
  - Pupils will be directed to use age-appropriate online resources and tools by staff.
- Wilbury Primary School will ensure a comprehensive whole **school** curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

Wilbury Primary School will build a partnership approach to online safety help parents/carers to become aware and alert to the risk posed by the use of online technologies and how to keep their children safe when online. We will do this through the provision of information on the school website, our communication channels (such as official social media), newsletters and offering specific online safety events for parents/carers or highlighting online safety at existing parent events.
- Wilbury Primary School will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach. This will include ensuring they understand the schools acceptable use policy, developing their knowledge of the risks posed by the use of online technologies, and their understanding applicable roles and responsibilities in relation to filtering and monitoring, cyber security and use of generative artificial intelligence.
- The DSL will respond to online safety concerns in line with the school's safeguarding and associated policies such as child-on-child abuse and behaviour. Internal sanctions and/or support will be implemented as appropriate. Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- Wilbury Primary School will carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. We will adopt the following approach and make use of SWGfL 360 safe tool [360 Degree Safe - Online Safety Review Tool | SWGfL](#).

## 20. Remote Learning

- Wilbury Primary School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using **school** provided or approved communication channels; for example, **school** provided email accounts and phone numbers **and/or** agreed systems **e.g** Microsoft Teams.

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- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our school code of conduct and Acceptable Use/online safety policies. When delivering remote learning, staff will follow our policy and guidance for remote learning, which is published on our website.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Parents /carers will be informed who from the school their child is going to be interacting with online and who they contact in case they need help and/or support. For example, the class teacher, support staff or SENDCo.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parental controls are implemented at home.

### **21. Safeguarding Children with Special Educational Needs and Disabilities or Health Issues**

- Wilbury Primary School acknowledges that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These children may have an impaired capacity to resist or avoid abuse both offline and online and face additional barriers in recognising abuse and neglect. 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, and
  - communication barriers and difficulties in managing or reporting these challenges.
  - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns, such as bullying and exploitation.
- Children with communication difficulties will be supported to ensure that their voice is heard and acted upon.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, our school will always consider extra pastoral support for children with SEN and disabilities. Details of support and provision can be found in the school's SEND policy and annual report.
- The DSL (or deputy) will work closely with the SENDCo (Juliet Bairfelt) to share information and plan support and monitor as required.

### **22. Mental health and children requiring mental health support**

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are made aware of how children's experiences, can impact on their mental health, behaviour, attendance and progress in school. Staff will be given regular training in mental health issues and how to recognise when child's mental health may be at risk.
- The school has appointed a lead for mental health (Ferdiye Hassan), who has been trained to have the knowledge and skills to promote and lead on wellbeing and mental health across the school.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff are expected to be vigilant at all times and if they have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.
- The school is proactive in promoting the mental health and well-being of pupils. This includes links to the school's approach for preventing and tackling bullying and mental health strategy.

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- The school has in place a range of ways to support children's mental health both within and beyond the school. This includes routes to escalate and clear referral and accountability systems. The school is fortunate to have a part time counsellor and ELSA trained pastoral worker, who can provide 1:1 emotional support as well as responding in times of crisis.

### 23. Children in need of a social worker (Child in Need and Child Protection Plans)

Wilbury Primary School recognises that pupils may need a social worker due to safeguarding or welfare needs and that children may need help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

- The DSL and all members of staff will work with and support social workers to help protect these and all vulnerable pupils.
- The DSL will always consider the support of the social worker to ensure any decisions are made in the best interests of the child's safety, well-being, welfare and educational outcomes.

### 24. Looked after children, previously looked after children and care leavers

- Wilbury Primary School will ensure that our staff have the skills, knowledge and understanding to keep looked-after and previously looked-after children safe.
- The DSL has details of a child's social worker and relevant Virtual School Heads. Appropriate staff are provided with relevant information about each looked after child's legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The school has appointed a designated teacher, Mrs Sarah Knol Davies, who is responsible for promoting the educational achievement of looked-after and previously looked-after children in line with statutory guidance. The designated teacher will have the relevant qualifications and experience and receive appropriate training to perform the role. The designated teacher will:
  - Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
  - Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium funding can be best used to ensure each child's well-being and progress. This includes the statutory duties of the Virtual School Heads (extended in June 2012 [Promoting the education of looked-after and previously looked-after children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/Promoting_the_education_of_looked-after_and_previously_looked-after_children_-_GOV.UK_(www.gov.uk).pdf)) and the non-statutory responsibility ([Children's social care: virtual school head role extension - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/123457/Children_s_social_care_virtual_school_head_role_extension_-_GOV.UK_(www.gov.uk).pdf)) updated in March 2024) for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.
- The DSL and designated lead for looked after children will work with the local authority to ensure suitable arrangements are in place for care leavers, including with the appoint Personal Adviser, and will liaise with them should any issues occur.

### 25. Children who are absent from education

- All staff should be aware that children being absent from school, particularly unexplainable, prolonged, repeat and/or persistent absences from education can act as a vital warning sign of a range of safeguarding possibilities. These might include:
  - neglect
  - child sexual abuse or exploitation and child criminal exploitation – particularly county lines
  - mental health problems
  - substance abuse
  - radicalisation
  - FGM or forced marriage.

See also information in Appendix 3 of this policy or KCSIE Annex B.

- Wilbury Primary School accepts the importance of its responsibility to pupils with unexplained and prolonged periods of absence keeping them safe and in reducing the risk of them becoming a child missing from education in the future. This includes pupils where problems are first emerging and also those already known to local authority children's social care and need a social worker (such as a child who is a child in

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need or who has a child protection plan, or is a looked after child), or where being absent from education may increase known safeguarding risks within the family or in the community.

- The school has in place robust systems for recording and monitoring daily attendance and punctuality of pupils. This includes 'first day' calls, follow up calls, letters home and home visits. The school has robust procedures in place for monitoring the whereabouts, wellbeing and safety of pupils who are absent from education, particularly on repeat occasions and/or prolonged periods. Any concerns will be acted on as safeguarding and following the school safeguarding procedures. This is set out in the school's attendance policy. [Wilbury Primary School - School Policies](#)
- The school recognises the importance of keeping in touch with parents and carers to promote and ensure the welfare, well-being and safety of pupils. The school will therefore hold more than one emergency number for each child to ensure that a parent/carer can be contacted urgently or for the DSL to check on the well-being of a pupil.
- The school is aware of its duty to report any missing children to the local authority. Full details of these systems for monitoring and supporting children with poor attendance and how the school follows statutory advice in removing pupils from the school roll can be found in the school's attendance policy.

### 26. Child-on-Child Abuse

- All members of staff at Wilbury Primary School recognise that children can abuse their peers. This can happen both in and out of school and online. We believe that no form of abuse can be tolerated. All victims will be taken seriously, offered reassurance and appropriate support, regardless of when and/or where the abuse has taken place and assured that they are not creating a problem. Staff must be mindful that their response could impact on another child coming forward in future.
- All staff should understand the following aspects of child-on-child abuse and be clear about the school's approach:
  - that even if there are no reports in their schools it does not mean it is not happening; it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).
  - the importance of challenging inappropriate behaviour between peers, many of which are listed below, that are actually abusive in nature. 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 behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
  - that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved.
  - that children may not find it easy to tell staff and a reminder that children can show signs in ways they hope adults will notice and react.
- In line with KCSIE 2025 the school recognises that child-on-child abuse is likely to include, but may not be limited to:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - sexual violence
  - sexual harassment
  - upskirting
  - consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- Paragraph 33 fully details the types and forms of child-on-child abuse can take that staff should be aware of can be found in Appendix 8 of this policy.
- When responding to concerns relating to child-on-child sexual violence or harassment, the school will follow the procedures set out in Appendix 8 of this policy. This follows the guidance outlined in KCSIE 2025 Part 5.
- The school recognises consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery) as a safeguarding issue; all concerns must be reported to and dealt with by the DSL (or deputy). The school will adhere to its protocol/procedures which follows the following advice [DfE Searching Screening and Confiscation Advice](#) (updated July 2023) and [UKCIS Education Group Sharing nudes and semi-nudes advice for education settings](#) (updated March 2024).

### 27. Children who are lesbian, gay, bisexual or gender questioning

- A child or a young person within Wilbury Primary School may be lesbian, gay, bisexual or gender questioning. This is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.
- However, Wilbury Primary School is aware that the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.
- Wilbury Primary School, therefore recommends that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.
- At Wilbury Primary School, a cautious approach is taken. We consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. We refer to the DfE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.
- At Wilbury Primary School, we recognise that risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.
- Lesbian, gay, bisexual or gender questioning is part of the school's Relationship and Sex Education and Health Education curriculum.

### 28. Gangs, County Lines, Serious violence, Crime and Exploitation

- Wilbury Primary School recognises the impact of gangs, county lines, serious violence, crime and sexual exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe.
- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively (see further information in Appendix 2):
  - unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
  - children who go missing for periods of time or regularly come home late
  - children who regularly miss school or education or do not take part in education
  - change in friendships/relationships with others/groups
  - children who associate with other young people involved in exploitation
  - children who suffer from changes in emotional well-being
  - significant decline in performance
  - signs of self-harm/significant change in wellbeing
  - signs of assault/unexplained injuries.

### 29. Female genital mutilation (FGM)

- All staff are made aware of the issues around FGM, so-called 'honour'-based abuse and forced marriage, as well as the signs and symptoms, the actions they must take and the MANDATORY duty to reporting any concerns to the Police under Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)
- Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers (and all other staff and adults associated with the school). If a teacher or any member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out (or maybe carried out) on a girl under the age of 18, the teacher/member of staff **must** report this to the police. Those failing to report such cases may face disciplinary sanctions.
- Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of

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coercion is used to cause a person to enter into a marriage. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

- 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. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
- See KCSIE 2025 Appendix B (Appendix 2 of this policy) for further details of so-called 'honour'-based abuse and forced marriage. It is all staff's responsibility, including other adults such as contractors and trainees, who provide support to pupils to comply with this duty.

### 30. Preventing radicalisation

- At Wilbury Primary School we have a duty to prevent pupils from being drawn into terrorism.
- At Wilbury Primary School we recognise that:
  - there is no single route to radicalisation. However, there are some behavioural traits that could indicate that a learner is susceptible to radicalisation into terrorism.
  - radicalisation is not a linear process. Learners may express a combination of behaviours at different times.
- The DSL (and any deputies) will:
  - take any concerns about the potential radicalisation of a pupil seriously and take the same approach as any safeguarding concern.
  - consider an individual's behaviour in the context of wider influencing factors and vulnerabilities.
  - In most cases, speak with the learner and their parents or carers (if under 18).
  - consider contextual, vulnerability and protective factors to make a comprehensive assessment of risk and harm.
  - keep a written record of all concerns, discussions and decisions made, and the reasons for those decisions.
- The DSL or member of the safeguarding team will undertake additional Prevent awareness training and make sure that staff are also appropriately trained to equip them to identify and protect any pupils at risk of radicalisation.
- The DSL (and any deputies) are aware of local procedures for making a Prevent and Channel referral which is seen as part of the school's wider safeguarding obligations. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. An individual will be required to provide their consent before any support delivered through the programme is provided.
- The member of staff assigned as the school's Prevent Lead will ensure a detailed Prevent risk assessment is undertaken and reviewed at least annually, based on the DfE risk assessment template and advice [Prevent duty: risk assessment templates - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-duty-risk-assessment-templates). This includes the risks posed by pupils' access to the internet and social media and the school's mitigating actions, such as monitoring and filtering internet use.
- *Appendix 2 sets more details for staff on preventing radicalisation.*

### 31. Use of reasonable force

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

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- The school's policy follows DfE guidance [Use of reasonable force in schools](#), and includes:
  - response to risks presented by incidents involving children with additional vulnerability - SEND, mental health or with medical conditions,
  - duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty
  - positive and proactive behaviour support to reduce the occurrence of challenging behaviour and the need to use reasonable force.

### **32. Curriculum – Opportunities to Teach Safeguarding**

- We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned. This is a crucial part of preventative education.
- Has put in place a whole school approach to helping pupils understand how to keep themselves safe. This aims to prepare pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- The school's approach to teaching pupils about safeguarding, including online safety, is part of providing a broad and balanced curriculum. The detail of this is set out in detail in the policy/policies for Curriculum/RSE/PSHE/online safety. The school makes use of published guidance to develop and deliver this provision, including for RSE, PSHE, and teaching online safety.
- Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.
- The school recognises that one size does not fit all and takes a personalised and contextualised approach for more vulnerable children, victims of abuse and some SEND children, so they know how to assess risk and adopt safe practices.
- The school has implemented the mandatory DfE Relationships, Sex and Health Education curriculum. The school is embedding this into all aspects of the curriculum to ensure equality, age-appropriate and full experiences for all pupils. Further details are given in our SMSC, RSE and PSHE curriculum policies. [Wilbury Primary School - Personal Development](#)
- Our school systems support children to talk to about their concerns and worries with confidence in the knowledge they will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

### **33. Alternative provision**

- Wilbury Primary School sometimes places pupils in alternative provision either on a full or part time basis.
- The school recognises the additional vulnerabilities of any pupil placed in an alternative provision and that the responsibility for that safeguarding of that pupil remains with the school.
- All placements are reviewed on a regular basis to ensure the welfare and education needs to pupils are being met and that pupils are benefiting from the placement.
- Wilbury Primary School checks with alternative providers at least termly that safer recruitment requirements are being met and that all the appropriate checks have been carried out on any adults working or volunteering in the provision that they are deemed suitable to work with children. Wilbury Primary School expects the alternative providers to confirm in writing that all the appropriate checks have been carried on staff and volunteers and also to notify the school if any changes to staffing.
- Wilbury Primary School has put in place systems to ensure there is regular and ongoing communication between the school and the alternative provider in relation to pupils safeguarding, welfare, well-being and progress. This includes
  - the alternative provider to notify the DSL of any safeguarding concerns or issues about any pupils placed with them
  - daily attendance notifications, so Wilbury Primary School knows the whereabouts of any pupils placed with an alternative provider at all times.
- This also applies to children who cannot attend school for health reasons and will be considered on a case-by-case basis.

### **34. Elective home education**

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- If a parent/carer wishes to educate their child at home the school will provide advice and support to aid them in their decision making to help parents make the right decision in the best interests of their child. This will include discussion with parents (and other professionals), awareness of additional needs of child with SEND and/or social worker, transition support, and informing the LA (*requirement to notify LA on removal from roll*). This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.
- In line with KCSE paragraph 178, Wilbury Primary School recognises that elective home education may not be an overwhelmingly positive experience and can mean for some children that they are not in receipt of suitable education. Also, that a child is less visible to the services that are there to keep them safe.

### 35. Private fostering and host families

- Private fostering is defined as when someone who is not a parent or a 'close relative' (eg. great aunt, cousin, mum's friend or a neighbour) is looking after a child or young person under the age of 16 (under 18 if they are disabled) for 28 days or more in their own home. A relative is defined in the Children Act 1989 as a grandparent, uncle or aunt (whether by full-blood, half-blood or by marriage or civil partnership), sibling or stepparent. The school is aware of its duty to report to LA of any such arrangements the school learns about and will work with the Virtual School Head to promote the achievement and wellbeing of pupils in kinship care.
- If the school makes arrangements for pupils to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related. for example, as part of a foreign exchange visit or sports tour. This is often described as 'homestay' arrangements. The school will follow the guidance set out in KCSIE 2025 paragraphs 343-346 and Annex D.

### 36. Safer Recruitment

- Wilbury Primary School is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers, this includes agency staff, contractors and third-party staff) who are safe to work with our learners and staff.
- Wilbury Primary School will follow the guidance in KCSIE 2025 (Part Three 'Safer Recruitment') and from The Disclosure and Barring Service (DBS). As part of The Children First Academy Trust, we follow rigorous guidelines for the recruitment of staff across our family of schools.
- The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The governing body and leadership team will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- Wilbury Primary School are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We expect all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings. Any staff member failing to make accurate declarations or misrepresenting themselves in any way will be subject to the school's disciplinary policy.
- We will ensure that all staff and volunteers have read the staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.
- The full policy is provided in Appendix 3 of this policy.

### 37. Concerns and allegations against members of staff and adults in the school

- Wilbury Primary School recognises that it is possible for any member of staff or adult working on behalf of the school, including volunteers, governors, contractors, agency and third-party staff (including supply teachers), visitors and contractors, to behave in a way that:
  - indicates they have harmed a child, or may have harmed a child;
  - means they have committed a criminal offence against or related to a child;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;or

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- behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- At Wilbury Primary School we have processes in place for continuous vigilance, so we can maintain environment that deters and prevents abuse and challenges inappropriate behaviour. To do this we aim to create the right culture and environment so that staff feel comfortable to discuss matters both within and, where it is appropriate, outside the workplace (including online) which may have implications for the safeguarding of children. All staff and volunteers should feel able to raise concerns about poor or unsafe practice (including online) and potential failures in the school's safeguarding regime. The leadership team takes all concerns or allegations received seriously. If a member of staff, volunteer or other adult is concerned at the lack of response or feels their concerns will not be taken seriously then they should consider Whistle blowing - see section below.
- Allegations should be referred immediately to the Headteacher who will contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member.
- In the event of allegations of abuse being made against the Headteacher, staff are advised that allegations should be reported to the chair of governors who will contact the LADO.
- The school's procedures are consistent with local safeguarding procedures and practice guidance. In line with KCSIE 2025, we have policy and procedures in place that covers:
  - Allegations that may meet the harms threshold
  - Concerns that do not meet the harm threshold
- Further details are in KCSIE part 4 and a detailed policy for dealing with allegations against staff should be in place, this could be a separate policy or in an appendix. [Children First Academy Trust - Policies](#)

### 38. Duties of referral

#### Duty to refer to the Disclosure and Barring Service

- Wilbury Primary School has a legal requirement to refer to the Disclosure and Barring Service (DBS) where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
  - engaged in relevant conduct in relation to children and/or adults,
  - satisfied the harm test in relation to children and/or vulnerable adults; or
  - been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.
- Referrals will be made as soon as possible, when an individual has been removed from regulated activity. This could include when an individual is suspended, redeployed into work in an activity that is not regulated, dismissed or resigned. The school will provide the DBS with full information.
- When an allegation is made, an investigation will be carried out to gather evidence to establish if it has foundation, and the school will ensure they have sufficient information to meet the referral duty criteria in the DBS referral guidance.
- The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

#### Duty to consider referral to the Teaching Regulation Agency

- If the school or teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, consideration will **be** given to referring the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.
- The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

### 39. Whistle blowing

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice or other wrongdoing and be secure that such concerns will always be taken seriously by the leadership team. Wrong doing covered by this 'public interest disclosure' includes:
  - someone's health and safety is in danger
  - damage to the environment
  - a criminal offence (eg fraud)

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- not obeying the law
- covering up wrong-doing
- misusing public funds
- actions that negatively affect the welfare of children.
- All members of staff are made aware of the school Whistleblowing procedure. [Children First Academy Trust - Policies](#). It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Making allegations about a colleague that is later proven to be unsubstantiated, may be considered a disciplinary offence.
- The DfE provides advice to staff who feel they need to raise concerns: Whistleblowing procedure for maintained schools [Whistleblowing procedure for maintained schools - GOV.UK \(www.gov.uk\)](#) and Whistleblowing [Whistleblowing for employees - GOV.UK \(www.gov.uk\)](#).
- Staff should raise concerns with
  - Line Manger
  - Specified person in school such as the headteacher or DSL
  - Local Authority
  - Union or Professional Association
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### 40. The use of premises by other organisations

- Where services or activities are provided under the direct supervision/management of staff the school arrangements for child protection will apply.
- Where services or activities are provided separately by another body using the school premises, the Headteacher and governing body will:
  - seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers.
  - put in place arrangements for the organisation to liaise with the school on safeguarding matters
  - include safeguarding requirements in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. If this assurance is not achieved, an application to use premises will be refused.

These arrangements apply regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college.

The school will follow its safeguarding policies and procedures, including informing the LADO, relating to any incident(s) that happen when an individual or organisation is using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

[After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK \(www.gov.uk\)](#).

### 41. Site security and arrangements for visitors

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within in paragraphs 303-308 of KCSIE 2025. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site. Visitors will be provided with a leaflet outlining the school's safeguarding and child protection arrangements. All visitors are expected to follow these school arrangements.
- The headteacher/principal will use their professional judgement to decide on access arrangements and if a visitor should be supervised and/or escorted. All visitors are required to provide a current DBS check or equivalent validation through their agency. Once signed in they wear a visitor's lanyard whilst on the school

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premises for identification purposes. Without a valid and up to date DSC no visitor will be unescorted while on site.

- The school will give careful consideration to the suitability of any external organisations who may provide information, resources & speakers to pupils. The arrangements for the individuals providing these services on the school's premises may include an assessment of their education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required (eg for multiple sessions).
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.
- The school gates are opened in the mornings from 8.35-8.45 am for arrival and from 3.10 in the afternoon for collection. All gates are supervised by an adult and secured as soon as children have arrived and vacated. During the day all access is through the main office via the security gate. External doors to the school are secured with maglocks which require an electronic fob to open.

### 42. Complaints

- The school has a Complaints Procedure available to parents, learners and members of staff and visitors who wish to report concerns. This can be found in on the Trust website. [Children First Academy Trust - Policies](#)
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations against Staff policy or Appendix 6 or this policy.

### 43. Policy Monitoring and Review

- This policy will be reviewed at least annually. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures. Staff will be informed of any changes made.
- The DSL, deputy DSLs and SENCo meet at least weekly to review all safeguarding cases and check on the actions taken and what further actions are needed. This includes pupils with early help and child protection plans. Key stage staff meet weekly to check and review any emerging patterns which may suggest a safeguarding concern, issues may include attendance, behaviour, peer relationships and concerns raised by staff.
- The Designated Safeguarding Lead and Headteacher will provide regular reporting on safeguarding activity and systems to the governing body and Trust. The governing body and Trust will not receive details of individual children's situations or identifying features of families as part of their oversight responsibility.
- The governing body understands its responsibilities and duties as set out in KCSIE 2025 to ensure the effectiveness of the school's safeguarding arrangements, including those for online safety. In addition to the regular reports you safeguarding provided by the DSL, governors will take a proactive varied approach to checking the school's safeguarding arrangements. This will include: meetings with the DSL, visits to school, ascertaining the views of staff, pupils and parents through discussions and/r surveys, use of an audit tool, asking all governors to ask a safeguarding question during meetings with leaders/staff on other aspects of school life (such as subject meetings or SENCo meeting), termly checks of the SCR, review of school data and use of an external consultant.

## Appendix 1: Categories & Indicators of Abuse, Neglect and exploitation

All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online.

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

**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.

**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.

### Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

**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 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play

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- Excessive need for approval, attention and affection

**Sexual abuse:** : involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school

### Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

**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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate 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.

### Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Appendix 2: Job description of the DSL and DDSLs

Annex C of KCSIE sets out the following roles and responsibilities of the appointed DSL and any DDSLs.

- **Manage referrals**

The designated safeguarding lead is expected to 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. NPCC 'When to call the police' should help understand when to consider calling the police and what to expect when working with the police.

- **Working with others**

The designated safeguarding lead is expected to:

- 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 him or her 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. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (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-ordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) 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 and, where available, the mental health support team, 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 or college<sup>154</sup>. This includes:
  - ensuring that the 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 the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. Concerns and referrals are kept in a separate child protection file for each child. 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.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in section XX of this policy.

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Where children leave the 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. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) are aware as required.

In addition to the child protection file, 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 to help them put in place the right support to safeguard this child and to help the child thrive in the school.

### **• Raising awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection 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, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

### **• Training, knowledge and skills**

The 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 should be updated at least every two years. The designated safeguarding lead (and any deputies) will also undertake Prevent awareness training. Training will provide designated safeguarding leads 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 early 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 in order 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 college, 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 are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to 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, and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

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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 should support the designated safeguarding lead 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, and
- 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, designated safeguarding leads (and deputies) should 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 importance of information sharing, both within the school, and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

- **Holding and sharing information**

- The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:
- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- 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 LA children's social care or the Prevent program etc.

## Appendix 3: Specific safeguarding issues (KCSIE Annex B)

### KCSIE states:

School leaders and those staff who work directly with children should read this Annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow the school's child protection policy and speak to the designated safeguarding lead (or a deputy) - [see section 11 of this policy](#).

**Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Contact details are given in table at front of this policy.**

### 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.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

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

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.

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, it is important that the child perpetrator is also recognised as a victim.

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

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

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse 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.

Children who have been exploited will need additional support to help keep them 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.

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

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

Further information on signs of a child's involvement in sexual exploitation is available in

Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

### County lines

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

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

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

A number of the indicators for 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.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office and The Children's Society County Lines Toolkit For Professionals](#).

### 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. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### Children who are absent from education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital

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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. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

### Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### 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). 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, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills 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), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#).

### Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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.

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

### 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 the 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 (or a deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

### National Domestic Abuse Helpline

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

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Young Lives: Young people and domestic abuse | Safelives](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

### Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in

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some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: [here](#).

### Mental health

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school.

More information can be found in the [Mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England.<sup>1</sup> has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Every Mind Matters](#) for links to all materials and lesson plans.

### Modern Slavery and the National Referral Mechanism

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK](#)

### Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation**<sup>2</sup> is the process of a person legitimising support for, or use of, terrorist violence.

**Terrorism**<sup>3</sup> 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

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the public and is made for the purpose of advancing a political, religious or ideological cause.

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

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) [making a Prevent referral](#).

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<sup>1</sup> Public Health England: has now been replaced by the UK Health Security Agency and the Office for Health Improvement and Disparities (OHID), which is part of the Department of Health and Social Care, and by the UK Health Security Agency. However, the branding remains unchanged.

<sup>2</sup> As defined in the [Government's Prevent Duty Guidance](#) for England and Wales.

<sup>3</sup> As defined in the Terrorism Act 2000 (TACT 2000)

<http://www.legislation.gov.uk/ukpga/2000/11/contents>

### The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard<sup>4</sup> to the need to prevent people from becoming terrorists or supporting terrorism”.<sup>5</sup> This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in education settings should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments.

The school or college’s designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

### Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether

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they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#) and [Channel training from the Home Office](#).

### Additional support

[The Department has published further advice for those working in education settings with safeguarding responsibilities on the Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school and college teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education

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<sup>4</sup> [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](#)

<sup>5</sup> “Terrorism” for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

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settings to comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The [Safeguarding and Prevent - The Education and Training Foundation \(etfoundation.co.uk\)](http://etfoundation.co.uk) provides online training modules for practitioners, leaders and managers, to support staff and governors/Board members in outlining their roles and responsibilities under the duty.

London Grid for Learning has also produced useful resources on Prevent ([Online Safety Resource Centre - London Grid for Learning \(lgfl.net\)](http://lgfl.net)).

### Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of this guidance.

### Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in 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 frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. The [Youth Endowment Fund \(YEF\) Toolkit](#) sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to

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tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

[Police, Crime, Sentencing and Courts Act 2022](#) introduced a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

### So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of 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. It is important to be 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 should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) 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. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**<sup>6</sup> that requires a different approach (see below).

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.

### FGM mandatory reporting duty for teachers

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

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>7</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is

<sup>6</sup> Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

<sup>7</sup> Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

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18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

### Forced marriage

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#). School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).

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. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

## Appendix 4: Sources of support and advice

Links to sources of further advice and support for school staff, volunteers, governors and parents/carers. Additional links can be found throughout KCSIE 2025, including in Annex B (specific issues) across pages 163-170.

### Support for staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)
- DfE: [Whistleblowing for employees - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- DfE: The online tool [Report child abuse to a local council - GOV.UK \(www.gov.uk\)](http://www.gov.uk) *directs you to the relevant local children's social care contact number*
- NSPCC: [Safeguarding children and child protection](http://www.nspcc.org.uk)
- DfE advice: [What to do if you're worried a child is being abused](http://www.gov.uk) –

### Support for Learners

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Kooth: [Home - Kooth](http://www.kooth.com)
- Sharp: [The SHARP System](http://www.sharp.org.uk)

### Support for adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [napac.org.uk](http://www.napac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### Abuse

- [Supporting practice in tackling child sexual abuse - CSA Centre of Expertise on Child Sexual Abuse](http://www.csa-centre.org.uk) *has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.*
- [Faith based abuse: National Action Plan](http://www.gov.uk) - DfE advice
- [Disrespect NoBody campaign](http://www.gov.uk) - Home Office website
- [Tackling Child Sexual Abuse Strategy](http://www.gov.uk) – Home Office policy paper

### Contextual Safeguarding, child-on-child abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- National bullying helpline: [Information and advice about all forms of bullying \(nationalbullyinghelpline.co.uk\)](http://nationalbullyinghelpline.co.uk)
- Kidscape: [Help With Bullying \(kidscape.org.uk\)](http://www.kidscape.org.uk)
- HM Government campaign [Working together to stop child sexual abuse - GCS \(civilservice.gov.uk\)](http://www.gov.uk)

### Domestic Abuse

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- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk) *National Domestic Abuse Helpline:*
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- Respect Phoneline: <https://respectphoneline.org.uk>

### Honour Based Abuse and FGM

- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- Forced marriage resource pack: [Forced marriage resource pack - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- Mandatory reporting of female genital mutilation: procedural information: [www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

### Mental Health

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- PHSE Rise above resources and lesson plans: [Mental wellbeing | Overview | PHE School Zone](#)
- DfE: [Mental health and behaviour in schools - GOV.UK \(www.gov.uk\)](#)

### Online Safety

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [Social media and online safety | NSPCC Learning](#)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Lucy Faithful Foundation <https://www.lucyfaithfull.org.uk/advice/>
- UK Council for Internet Safety (UKCIS) 'Education for a Connected World Framework' [Education for a Connected World - GOV.UK \(www.gov.uk\)](#)
- DfE 'Teaching online safety in school' guidance. [Teaching online safety in schools - GOV.UK \(www.gov.uk\)](#)
- UK Council for Internet Safety (UKCIS): [UK Council for Child Internet Safety \(UKCCIS\)](#)

### Personal, social and health education and Relationships and sex education

- DfE: [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](#)
- DfE: [Plan your relationships, sex and health curriculum - GOV.UK \(www.gov.uk\)](#)
- DfE: [Engaging parents with relationships education policy - GOV.UK \(www.gov.uk\)](#)
- PSHE Association: [Home | www.pshe-association.org.uk](http://www.pshe-association.org.uk)

### Radicalisation and hate

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision – stop hate crime: [www.report-it.org.uk](http://www.report-it.org.uk)

## Appendix 5: Safer recruitment

### Section i Recruitment and selection processes

Commitment to recruit suitable people [Para 210-212](#)

Details of training for staff involved in recruitment, including at least one person on an interview panel has completed safer recruitment training [Para 212-213](#)

#### Advert [Para 214-215](#)

Define role including job description and person specification covering

- the skills, abilities, experience, attitude, and behaviours required for the post; and
- the safeguarding requirements
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

#### Application forms [Para 216-219](#)

Policy should include:

- statement advising applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children
- how copy of child protection policy and practices and policy on employment of ex-offenders are provided to applicants
- the information applicants are required to provide: personal details, current and former names, current address and national insurance number; details of their present (or last) employment and reason for leaving; full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment; qualifications, the awarding body and date of award; details of referees/references; and a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.
- Note that CVs will not be accepted without an accompanying completed application form.

*Note: Schools and colleges should not accept copies of curriculum vitae in place of an application form.*

#### Shortlisting [Para 220-225](#)

Policy should cover the school's approach to shortlisting:

- that shortlisted candidates (not others [para 220-221](#) should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.
- that applicants should be asked to sign a declaration confirming the information they have provided is true and that approach where the signature is electronic [Para 222](#)
- the purpose and implications of the self-declaration [Para 223](#)
- how candidates are shortlisted – by at least two people who will consider/look for any inconsistencies, gaps in employment and reasons given for them and all potential concerns [Para 224](#)
- consider conducting online searches (of shortlisted candidates) as part of due diligence - to help identify any incidents or issues that have happened, and are publicly available online, the school may explore any issues or concerns with the applicant at interview. [Para 225](#)

#### Employment history and references [Para 227-228](#)

Policy should state:

- The importance of references in the recruitment process and that information from references will be used to confirm whether they are satisfied with the applicant's suitability to work with children
- account is taken of the advice on gaining, checking, verifying and using points listed in
- that references will be asked of current or last employer, and where possible from the employer where the applicant last worked with children
- the source of the reference will be verified, and that the person completing the reference is in a senior role
- information on the application form will be compared with that in the reference and any discrepancies taken up with the candidate
- establish the reason for the candidate leaving their current or most recent post
- make clear that appointments will not be confirmed until all references are in place/ issues resolved.

#### Selection [Para 229-234](#)

Policy should include

- how school uses a range of selection techniques to identify the most suitable person for the post [Para 229](#)

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- questions will cover candidates suitability and motivation for post and working with children, exploring experiences of working with children, probing any gaps in employment or frequent changes in employment **Para 230-231**
- exploration with candidates to determine their suitability to work with children **Para 232**
- pupils/student involvement in the recruitment process in a meaningful way **Para 233**
- observation of short-listed candidates (under appropriate supervision) **Para 234**
- that information considered in decision making will be clearly recorded along with decisions made. **Para 234**
- interviews and other observations will be recorded and any declarations checked. Applications, and documents arising from interviews, will be kept by the office manager for a minimum period of 6 months.

How school manages any disclosures of cautions and convictions on DBS, including data protection related to criminal information as a result of DBS filtering changes November 2020. Also actions if applicant has not declared these, school decision making concerning any disclosures and risk assessment). **Para 223**

### Questions that must now be asked and noted in application pack for applicants and recruitment policy

- Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974?
- Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974

### **Risk assessments**

- Any used?
- Purpose eg: further checks for those who have lived and worked abroad, issue on DBS, disability, use of volunteers etc
- Quality
- Evidence of any follow up/usage

*Advised but not covered in KCSIE except for volunteers – see below. Risk assessment could be undertaken for staff whose DBS has not come through, have lived or worked overseas, disabled and so on.*

### **Section ii Pre-appointment vetting checks, regulated activity and recording information**

Checks that must be undertaken when appointing individuals to work in regulated activity. **Para 235-237**. Policy must list the following checks **Para 237**

- verify a candidate's identity  
Guidance: [How to prove and verify someone's identity - GOV.UK](#) and for DBS [DBS ID checking guidelines - GOV.UK](#)
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children **see also paras 238-257**  
Guidance: [DBS checks: guidance for employers - GOV.UK](#)
- obtain a separate children's barred list check (*if an individual will start work in regulated activity with children before the DBS certificate is available*)  
Guidance: [Check the children's barred list - GOV.UK](#)
- verify mental and physical fitness to carry out their work responsibilities
- verify the person's right to work in the UK, including EU nationals.
- if a person has lived or worked outside the UK, make any further checks the school or college consider appropriate (**see also para 285-289**)
- verify professional qualifications, as appropriate to job.

In addition check that:

- a person taking up a management position is not subject to a section 128 direction made by the Secretary of State (independent schools, including academies and free schools only) **see also para 261-265**
- an applicant employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State imposed by the GTCE, before its abolition in March 2012 **see also para 266-267**
- reasonable steps are taken to establish whether an applicant employed carry out teaching work in relation to children, that person is subject to a prohibition order issued by the Secretary of State (**see also para 261-265**)
- appropriate checks are carried out to ensure that individuals employed to work in reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations (**see also para 268-272**)

Include a definition of regulated activity **Para 241** – if a person

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- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children;
- will be working on a regular basis in a specified establishment, such as a school, for or in connection with the purposes of the establishment, where the work gives opportunity for contact with children; or
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

### **DBS checks** (continuous service – moving from a previous post)

Statement on school policy on obtaining DBS for applicants who have worked in a school in England, whose last post ended not more than 3 months before appointment, where the person had regular contact with children, were appointed after 12 May 2006 into post which did not include regular contact with children, or they worked in a further education provision that brought into regular contact with children. **Para 238-240**

**Para 248** states a barred list check must be obtained in these circumstances

### **DBS checks** (Types of checks)

Statements:

- making clear which type of DBS check will be undertaken – basic, standard, enhanced or enhanced with barred list check and for whom, and that DBS will be contained as soon as practical after appointment **Para 242-253**
- a barred list check must only be undertaken for a person who will engage in regulated activity. **Para 245 and 253 (and flowchart)**
- if a person commences work ahead of completion of DBS check: the person will be appropriately supervised; all other checks completed and a barred list undertaken **Para 248, 249 and 253**
- making clear that the DBS check certificate will be sent to the applicant and that this must be shown to the employer **Para 248**  
*Advice: statement that failure to do so will be considered a disciplinary matter.*
- that school will assess cases fairly and in line with their policy on recruitment of ex-offenders policy **Para 215 and 251-252**

### **DBS update service** **Para 254-257**

Policy statement that:

- Individuals can join the DBS Update Service at the point that an application for a new DBS check is made. **Para 254**  
*Advice in Para 255 indicates it is good practice, many schools and colleges require new staff to join the Update Service as part of their employment contract.*
- For applicants who subscribe to the Update Service, the school will:
  - obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check
  - confirm the DBS certificate matches the individual's identity
  - examine the original certificate to ensure that it is valid for the children's workforce
  - ensure that the level of the check is appropriate to the job they are applying for, e.g. enhanced DBS check/enhanced DBS check including with barred list information. **Para 256**

### **Recording information - the SCR** **Para 271-280**

Policy statement of school approach to recording on the SCR:

- must be maintained for all employed staff, agency staff and supply staff (even if work one day) and (independent schools) the proprietor body and (academies & free schools) members of the trustees of the academy trust **Para 273-275**
- this will be kept on paper or electronically **Para 279**
- what is recorded on SCR and that date on which each check was completed to certificate obtained. **Para 276**
  - barred list check
  - an enhanced DBS check requested/certificate provided
  - a prohibition from teaching check
  - further checks on people who have lived or worked outside the UK
  - a check of professional qualifications, where required; and
  - a check to establish the person's right to work in the United Kingdom.

In addition:

- colleges **must** record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18; and

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- independent schools (including academies & free schools) **must** record details of the section 128 checks undertaken for those in management positions.
- details of an individual will be removed from the SCR once they no longer work in the school **Para 277**
- the written confirmation from business supplying the member of supply staff that the business has undertaken the relevant checks and obtained the appropriate certificates **Para 275 (see also para 290-293)**
- details of any non-statutory information held on the SCR, such as staff training, references, checks on volunteers, checks on governors **Para 278**

### Multi-academy trusts

Statement on MAT approach to maintaining SCR for trust and individual schools within trust **Para 280**

### Retention of documents **Para 281-283**

Statement on school policy for recruitment document retention:

- copy of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10 – should not be kept for longer than six months after check
- copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.

## Section iii Other checks that may be necessary for staff, volunteers and others, including the responsibilities on schools and colleges for children in other settings

### Individuals who have lived or worked outside the UK **Para 285-289**

This covers all countries including those in the EU/EEA.

- Statement that details school approach to obtaining this information through overseas records checks and/or obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked **Para 285**
- If the information is not available school will undertake a risk assessment that supports decision making based on available information **Para 286-288**
- Statement about applying for QTS **Para 289**

*Advice: always make a record of the decision in the staff file – the should be done all candidates so there is clear rationale of the decision made, even if checks are not made.*

### Agency and third party staff (supply staff) **Para 290-293**

Statement school will:

- obtain written notification from any agency, or third party organisation, that they have carried out the checks on an individual who will be working at the school that the school would otherwise perform **Para 290**
- obtain written confirmation of the enhanced DBS check **Para 291-292**
- check that the person presenting themselves for work is the same person on whom the checks have been made. **Para 293**

### Contractors **Para 294-299**

Statement school will:

- agree safeguarding requirements in the contract between the organisation **Para 293**
- any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check **Para 294**
- contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information) **Para 295**
- Schools and colleges are responsible for determining the appropriate level of supervision **Para 296**
- contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required **Para 297**
- individuals who are self-employed, the school will consider obtaining the DBS check (as self-employed people are not able to make an application directly to the DBS on their own account) **Para 298**
- always check the identity of contractors on arrival at the school or college. **Para 299**

### Trainee/student teachers **Para 300-302**

- for initial teacher trainees who are salaried by the school all necessary checks are carried out if trainees are engaging in regulated activity **Para 300**

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- for fee-funded trainee teachers the initial teacher training provider has the responsibility to carry out the necessary checks and provide written confirmation to the school that all pre-appointment checks have been carried out and the trainee has been judged by the provider to be suitable to work with children. **Para 301**
- statement about recording fee-funded trainees on SCR **Para 302**

### Visitors **Para 303-308**

*Can be covered in main policy or recruitment policy. Maybe a separate policy in place.*

Policy should;

- set out types of visitors to school premises **Para 303**
- state headteacher will use their professional judgment about the need to escort or supervise such visitors **Para 305**
- will not request DBS checks for visitors such as children's relatives or other visitors attending a sports day **Para 306**
- visitors who are there in a professional capacity school will check ID and be assured that the visitor has had the appropriate DBS check **Para 306**
- set out the arrangements for individuals from external organisations that provide information, resources and speakers include an assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required **Para 307-308**

### Volunteers **Para 309-316**

Policy should make clear that:

- School recognises the role volunteers can play and that children often see volunteers as being safe and trustworthy adults **Para 310**
- under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity **Para 309**
- a written risk assessment will be undertaken and used to help decide what checks, if any, are required. **Para 311-312**

The risk assessment should consider will be recorded and include:

- the nature of the work with children, especially if it will constitute regulated activity, including the level of supervision
  - what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers
  - whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability;
  - whether the role is eligible for a DBS check and if it is, what level is appropriate.
- school will obtain an **enhanced DBS check** (which should include children's barred list information) for all volunteers who are new to working in regulated activity with children **Para 313**
  - school will determine **supervision** based on whether:
    - a volunteer is considered to be supervised. have regard to the statutory guidance issued by the Secretary of State (see Annex E)
    - the supervision must be by a person who is in regulated activity relating to children and reasonable in all the circumstances to ensure the protection of children. **Para 314-315**
  - **existing volunteers** engaging in regulated activity do not have to be re-checked if they have already had a DBS check unless the school have any concerns **Para 316**

### Maintained school governors **Para 317-320**

State that:

- all governors are required to have an enhanced DBS check **Para 317**
- governors do not need a children's barred list check unless, in addition to their governance duties, they also engage in regulated activity **Para 318**
- a section 128 check is required because a person prevented from participating in the management of an independent school by a section 128 direction, is also disqualified from being a governor of a maintained school **Para 319**
- whether the school chooses to record this information on SCR **Para 319**
- there is no requirement for associate members to undergo an enhanced DBS checks unless they also engage in regulated activity at their school. **Para 320**

### Sixth form college governors **Para 321-322**

State that governing bodies in sixth form colleges can request an enhanced DBS check without a children's barred list check on an individual as part of the appointment process for governors.

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### Proprietors of independent schools, including academies and free schools and proprietors of alternative provision academies [Para 325-332](#)

- the chair or proprietor is checked by the Secretary of State [Para 325-326](#)
- the chair ensures that for the other members of the body the following checks are completed before, or as soon as practicable after, any individual takes up their position:
  - an enhanced DBS check undertaken, and that where such a check was undertaken and certificate is obtained [Para 325](#)
  - identity check [Para 328](#)
  - check individual is not subject to a section 128 direction that would prevent them from taking part in the management of an independent school (including academies and free schools) [Para 329](#)
  - any further checks, as the chair considers appropriate, should be undertaken where, by reason of the individual's living or having lived overseas [Para 330](#)
- For academy trusts, including those established to operate a free school:
  - the trust requires enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees [Para 331](#)
  - if an academy trust delegates responsibilities to any delegate or committee (including a local governing body), the trust **must** require DBS checks on all delegates and all members of such committees and check that members are not disqualified from taking part in the management of the school as a result of a section 128 direction [Para 332](#)

### Alternative provision [Para 331](#)

- the school continues to be responsible for the safeguarding of any pupil placed in an alternative provider and be satisfied that the provider meets the needs of the pupil [Para 331](#)
- obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment. [Para 331](#)
- Provider will notify the school of any staff changes so that the school can assure itself that safeguarding checks have been carried out (*new text added to para 331*)

### Adults who supervise children on work experience [Para 332-3337](#)

School policy states that:

- the placement provider is expected to have policies and procedures in place to protect children from harm [Para 332](#)
- children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The school will consider:
  - the specific circumstances of the work experience
  - the nature of supervision
  - the frequency of the activity being supervised, to determine what, if any, checks are necessary – will it count as regulated activity [Para 333](#)
  - whether the person providing the teaching/training/instruction/supervision to the child on work experience will be unsupervised themselves; and providing the teaching/training/instruction frequently (more than three days in a 30 day period, or overnight). [Para 334-335](#)
- is not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience [Para 336](#)
- if a child is doing work experience in a school or college, the school should check with a DBS enhanced check is requested for the child in question, provided the child is aged 16 or over. [Para 337](#)

### Children staying with host families (homestay) [Para 338-339](#)

Statement that

- the school may make arrangements for children receiving education at their institution to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related. *For example, as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements (see Annex D).*
- in some circumstances the arrangement where children stay with UK families could amount to "private fostering" under the Children Act 1989.

### Private fostering - LA notification when identified [Para 340-342](#)

- Define that private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental

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responsibility for them or a relative in their own home. That this arrangement is continue for more than 28 days.

- Brief policy statement that where private fostering arrangements come to the attention of the school (and the school is not involved in the arrangements), the local authority will be informed so it can check the arrangement is suitable and safe for the child.

## Appendix 6: Allegations of abuse made against staff

### Children First Academy Trust - Policies

#### **Section one: Allegations that may meet the harms threshold (Paras 359-426)**

This guidance should be followed where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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*Note: The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk. Para 360*

- An appropriate assessment of transferable risk to children with whom the person works will be undertaken and advice sought from the local authority designated officer (LADO). Para 361 and 366-371
- Statement about who to report allegations to. EG: the headteacher, if it concerns a member of staff or if the allegation concerns the headteacher, the report should be made to the Chair of Governors. Para 362

A “case manager” will lead any investigation. This will be either the headteacher or principal, or, where the headteacher is the subject of an allegation, the chair of governors or chair of the management committee and in an independent school it will be the proprietor. Para 362

- The policy should cover the following aspects:
  - The initial response to an allegation Para 363-371
    - No further action Para 372
    - Further enquiries Para 373-376
    - Supply teachers and all contracted staff Para 377-380
    - Individuals and organisations that use the school premises Para 381
    - Governors Para 382
  - Suspension Para 383-390
  - Supporting those involved - Duty of care Para 391-393
  - Confidentiality and Information sharing Para 394-407
  - Allegation outcomes [Substantiated Malicious False Unsubstantiated or Unfounded]. This includes duty to refer to TRA and, where required, to the DBS Para 403-404
  - Following a substantial allegation Para 405-407
  - Following a criminal investigation or a prosecution Para 408- 409
  - Unsubstantiated, unfounded, false or malicious allegations. This must cover an allegation that is shown to be deliberately invented or malicious, and how the school will consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy (often known as Code of Conduct) Para 410-411
  - Returning to work Para 412
  - Managing the situation and exit arrangements - Resignations and ‘settlement agreements’ Para 413-418
  - Record keeping Para 419-422
  - References Para 423 [note only substantiated allegations that cross the threshold of harm should be referred to a reference]
  - Learning lessons Para 424-425
  - Non recent allegations Para 426

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### Section Two: Concerns that do not meet the harm threshold [Para 427-449](#)

- Policy statement:
  - this covers process to manage and record any such concerns and take appropriate action to safeguard children for dealing with concerns (including allegations) which do not meet the harm threshold set out in section 1
  - 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. [Para 430](#)
- The policy should cover the following aspects:
  - Low level concerns, including note on creating a culture in which all concerns about adults are shared responsibility and with the right person, recorded and dealt with appropriately [Para 427-429](#)
  - Define what is a low-level concern - include some examples in the policy & likely sources, eg a child, parent or other adult within the school [Para 430-433](#)
  - Staff code of conduct and safeguarding policies [Para 434-436](#)
  - Sharing low-level concerns, should note that headteacher is ultimate decision maker, may consult with DSL. Must also include a note that low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified. Referral to LADO if concerns or pattern of concerns cross threshold of harm. [Para 437-440](#)
  - Recording low-level concerns [Para 441-444](#)
  - Looking for patterns & trends and how the school will respond, including changes to policy and staff training to ensure a culture of transparency & appropriate conduct. [Para 443](#)
  - Retaining information [para 444](#)
  - References [Para 445](#) [As above, only substantiated references should be included]
  - Responding to low-level concerns [Para 446-449](#)

## Appendix 7: Online safety

### Online safety policy should cover:

- use of mobile and smart technologies; described through the school's approach which takes account of the 4Cs (conduct, content, communication and commerce) [Para 137](#).
- all areas of online abuse including:
  - child-on-child abuse, including cyberbullying [Para 30 and 33](#)
  - sexual harassment including non-consensual sharing of nudes and semi-nudes and/or videos and how these can put children at risk [Para 22, 35-40, Part 5](#)
  - social media use [Para 41, 99 39, 185 and Part 5 Para 463 and 470](#)
  - cybercrime [Annex B](#)
  - preventing radicalisation [Annex B](#)
- Remote education and safeguarding [Para 138-139](#)
- Staff awareness that abuse can take place online [Para 3, 19, 22, 23, 27, 30, 33 and 134-136](#)
- Training for staff in online safety – this includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction and annually updated– see para 141 for further information) [Para 12, 17 and 123-127](#)
- Opportunities to teach children about online safety [Para 128](#) this includes duties of GB, RSE, use of DfE advice 'Teaching online safety in schools' and increased risk for some SEND children [Para 129-133](#)
- Remote learning and safe approaches [Para 138-140](#)
- Overblocking [Para 140](#)
- Filtering and monitoring on school devices and school networks. [Para 141-143](#)
- Information security [Para 144](#)
- Reviewing online safety (annual requirement - use of review tools) [Para 145-147](#)
- Information and support [Para 148](#)

## Appendix 8: Child-on-child abuse

### KCSIE references:

Para 30-33/Annex A paras 13-14 (types of bullying), 98 9<sup>th</sup> bullet and 156-157 8<sup>th</sup> bullet (school policy on bullying), para 46 (serious violence), para 98 1<sup>st</sup> bullet, 128-133 (opportunities to teach safeguarding), Part 5 & Annex B plus numerous references to bullying throughout KCSIE

### Types of child-on-child abuse listed in KCSIE (para 33):•

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- 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);
- 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 nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
- 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 obtaining sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

School should also have in place policy for searching, screening and confiscation and clear protocol of what to do if staff find out there may be inappropriate images on a child's phone. This includes reporting to Police. *Not covered in KCSIE but in [DfE guidance](#).*

### Para 157 states the policy should include:

- procedures to minimise the risk of child-on-child abuse
- the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously
- how allegations of child-on-child abuse will be recorded, investigated and dealt with
- clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported
- a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported
- a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children
- recognition that it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously; and
- the different forms bullying can take:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - abuse in intimate personal relationships between peers
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence and sexual harassment Part 5

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- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting) and school approach (refer to DfE [Searching Screening and Confiscation Advice](#) and [UKCIS Education Group Sharing nudes and semi-nudes advice for education settings](#). Schools should also have in place policy and/or protocol for dealing with inappropriate images on a phone or device and the school approach to searching and reporting. Useful sources of advice of this are: [Managing Sexting Incidents | SWGfL](#) and [Overview of Sexting Guidance.pdf \(publishing.service.gov.uk\)](#)
- 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
- upskirting (which is a criminal offence)
- initiation/hazing type violence and rituals.

### Section One – aims of policy

- reminder to staff that 'it can happen here' [Para 30, 450, 451, 487](#)
- reminder it can happen inside and outside school and online [Para 30 and 450-451, 456](#)
- List of the types of bullying [Para 33](#)
- importance of acknowledging and understanding scale of harassment and abuse, reference to term harmful sexual behaviours and the impact on a child [Para 452, 459-463](#)
- definitions of sexual violence [Paras 455](#) and sexual harassment [Para 456-458](#)
- awareness that children may not find it easy to tell staff and a reminder that children can show signs in ways they hope adults will notice and react [Para 16-17 and 471-474](#)
- zero tolerance approach – never acceptable or tolerated [Para 451](#)
- girls being more likely to be victim of sexual violence or sexual harassment [Para 157 and 453](#), also recognition of increased risk for SEND pupils
- details of how all incidents of bullying will be recorded, analysed and reported to governors and senior leaders. This includes looking for patterns and trends and links to safeguarding.

### Section Two – Non-sexual child-on-child abuse

- The school's current procedures for dealing with bullying that is non-sexualised. In the main this covers:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - abuse in intimate personal relationships between peers;
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;

### Section Three – child-on-child sexual violence and sexual harassment

- the designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and should be involved in the decision making on the initial response by the school. Important considerations will include: ([Para 487](#))
  - the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
  - the ages of the children involved
  - the developmental stages of the children involved
  - any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
  - if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)

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- that sexual violence and sexual harassment can take place within intimate
- personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Responding to reports and concerns of child-on-child sexual violence and sexual harassment **Part 5**. Details should cover:

- reminder it can happen inside and outside school and online **Para 450**
- importance of acknowledging and understanding scale of harassment and abuse **Para 414**
- awareness that children may not find it easy to tell staff and a reminder that children can show signs in ways they hope adults will notice and react **Para 17 and 471**
- zero tolerance approach – never acceptable or tolerated **Para 451**
- definitions of sexual harassment, sexual violence and harmful sexual behaviours **Para 455-462**
- school approach to preventing abuse **Para 463**
- **response to a report of sexual violence and sexual harassment** **Para 464-468**
- **steps school will take** in response to a report **Para 471-474**
- **reassurance** for victims that they are taken seriously, regardless of time taken to come forward and that abuse can have occurred online or outside school, not creating a problem, reassured not the feel ashamed or that they will be criminalised **Para 473**
- **record keeping** - recording all discussions and decisions in writing **Para 468**
- the **management of reports**, two staff present, if online – not viewing images, not promising confidentiality, trauma/impact of reporting, listening, additional barriers of reporting for some pupils, fact recording only, informing DSL as soon as possible **Para 468**
- **confidentiality** management **Para 475-480**
- **anonymity** while the case is progressing **Para 481-483**
- **risk assessment** process, including involving social care **Para 484-486**
- **follow up actions** - what to consider, such as age of child, seriousness of incident, power imbalance. **Para 487-488**
- **four management options** 1) manage internally, 2) early help, 3) referral to children's social care and 4) reporting to Police and managing the criminal process **paras 488-531**
- **unsubstantiated, unfounded, false and malicious reports** - review of records for patterns of concerning and problematic or inappropriate behaviour and if found false, consideration that the child and/or person who made allegation is in need of support and any disciplinary action **Para 532-534**
- **ongoing response** – safeguarding & supporting the victim **Para 535-544**
- **safeguarding & supporting** the alleged perpetrator(s) and children/YP who have displayed harmful sexual behaviour (also siblings and peers) **Para 545-547**
- **sanctions** and the alleged perpetrators **Para 548-550**
- **working with parents and carers** **Para 551-556**
- **safeguarding other children** Consideration of **ongoing education** for victim and perpetrator and if they may be **sharing same classroom** **Para 561**

### Section Four – school approach to the prevention of bullying (anti-bullying strategy)

- school ethos/ambition for approach to preventing child-on-child abuse
- details of the school's work to prevent child-on-child abuse
  - overview of opportunities for teaching safeguarding

### **CFA Safeguarding and Child Protection Policy & Procedures**

- how prevention of child-on-child abuse (including online abuse) is promoted – round school, school website, newsletters and so on
- information about the curriculum teaching, assemblies, special events etc
- responding to events/issues
- quality assurance/impact of the school's work to prevent child-on-child abuse monitoring and review of school's strategy to prevent child-on-child abuse