



Straits Primary School

Safeguarding & Child Protection Policy September 2025-26

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.

Straits Primary School staff aim to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children.

Reviewed by: Paul Freear, September 2025

Agreed by Governors: December 2025

Shared with all Staff: September 2025

Frequency of Review: Annually

Date of Next Review: September 2026

Designated Safeguarding Lead/Headteacher: Paul Freear

Deputy Designated Safeguarding Lead/Deputy Head: Daniel Wade

Named Governor for Safeguarding & Child Protection: Lewis Bourne

School CLA Designated Person: Paul Freear

School Online Safety Leads: Sarah Allen / Paul Freear

School Mental Health Lead: Paul Freear

**Local Authority Designated Officer (DO): Yvonne Nelson Brown / Sukhchandan Kaur
01384 813110 Referral email: allegations@dudley.gov.uk**

Virtual School Headteacher: Emma Thomas Emma.Thomas@dudley.gov.uk

Chair of Governors: Lewis Bourne c/o Straits Primary School 01384 818575

Vice-Chair of Governors: Claire Jones c/o Straits Primary School 01384 818575

Dudley Front Door: 0300 555 0050 / Out of Hours Duty Team: 0300 555 8574

POLICE: Child Abuse Investigation Unit 101 or 0345 113 5000

CSE Team: 01384 817777 Email: CSE.Team@dudley.gov.uk

SCHOOL NURSE SERVICE: Michelle Homer – michelle.homer1@nhs.net

Approved by: Full Governing Body Date: 15/12/2025

Reviewed on: 29/09/25

Next review due by: September 2026

Purpose and Aims

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

We will adopt an open and accepting attitude towards children as part of our responsibility for pastoral care. Staff encourage children and parents/carers to feel free to talk about any concerns and to see school as a safe place when there are difficulties. Children's worries and fears will be taken seriously, and children are encouraged to seek help from members of staff, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The school aims to ensure that:

- We establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to.
- We ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty.
- We ensure that if staff have any concerns about a child's welfare, we act on them immediately, following our organisation's child protection policy and speak to the designated safeguarding lead (or deputy).
- We include in the curriculum activities and opportunities (specifically through PHSRE/computing) which equip children with the skills they need to stay safe from abuse (including online) and to know where to get help.
- We ensure every effort is made to establish effective working relationships with parents/carers and colleagues from other agencies.
- We operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children including identity, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references, and prohibition from teaching or managing in schools (s128 - *For senior leaders in Academies/Independent schools and for Governors in maintained schools*).
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. **We give special consideration to children who:**

- Have special educational needs (SEN) or disabilities or are young carers.
- May experience discrimination due to their race, ethnicity, religion, LGBTQ+, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual and criminal exploitation, forced marriage, or radicalization.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are Children in Care or previously Children in Care.
- Are missing or absent from education for prolonged periods and/or repeat occasions or whose parent/carer has expressed an intention to remove them from school to be home educated.

Statutory Framework

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Governance Handbook](#) and the [DfE's filtering and monitoring standards](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which 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
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalization and extremism
- Information Sharing (2024)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the 2018 Childcare Disqualification Regulations) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

Our safeguarding policy also refers to the locally agreed multi-agency procedures that have been put in place by the 3 safeguarding partners. DSPP interagency child protection and safeguarding procedures can be located at:

<https://dudleysafeguarding.org.uk/children/professionals-working-with-children/safeguarding-children-procedures/>

The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead will always be a member of the senior leadership team and will take lead responsibility for child protection and wider safeguarding - this includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

Designated Safeguarding Lead: Paul Freear (Headteacher)

Deputy Designated Safeguarding Lead: Daniel Wade (Deputy Head)

During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns. They will also ensure they are contactable out of school hours and during the holidays by email (pfreear@straits.dudley.sch.uk or dwade@straits.dudley.sch.uk) or via mobile phone.

If the DSLs are unavailable, then SLT members (Emma Vellender, Katie James and Paul Hardeman) will act as cover. In no members of the SLT can be contacted, then the staff member should refer their concerns directly to Dudley Children's Services (Dudley Front Door) 0300 555 8574.

The DSL will be given the time, funding, training, resources and support to:

- Work closely with all adults and share information & provide advice and support to staff on child welfare and safeguarding and child protection matters.
- Set out procedures so that staff promptly share their safeguarding concerns in writing and ensure records of any concerns are maintained (CPOMS).
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- 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.
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to Channel programme.
- Refer cases where a crime may have been committed to the Police.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children, particularly in relation to Early Help.
- Work closely with Mental Health Leads.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding and take the lead in the filtering and monitoring systems and processes in place at our school.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- The DSL will also liaise with local authority case managers and designated officers (LADO) for safeguarding and child protection concerns as appropriate.

The DSLs will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent Awareness training (please refer to Safeguarding training record).

The full responsibilities of the DSLs are set out in their job description.

The Headteacher and Governing Body

The Headteacher (at Straits this is also the DSL) is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary & supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Ensuring that staff (including temporary & supply staff) understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly (including online and cyber security).
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service/Teaching Regulatory Agency/TRA as required.
- Complete appropriate safeguarding and child protection (including online) training.
- Ensuring the relevant staffing ratios are met, where applicable and making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the setting.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DDSL on this.

The Governing body will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The Governing Body will ensure that:

- The school has a safeguarding and child protection policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly on the school website.
- The policy will be reviewed at least annually or more often, for example in the event of new guidance or a significant incident.
- Governors have an enhanced criminal records certificate from the DBS (Governance is not a regulated activity and so governors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity).
- They carry out a section 128 check for school governors, because a person subject to one is disqualified from being a governor.
- The school operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers/people in a position of trust.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- There is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection (the "Designated Safeguarding Lead") and there is always cover for this role (at least one deputy) with appropriate arrangements for before/after school and out of term activities.
- The Designated Safeguarding Lead undertakes effective Local authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings etc.
- The Head Teacher, and all other staff and volunteers who work with children undertake appropriate training which is regularly updated (at least every year); and that new staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities.
- Any deficiencies or weaknesses in these arrangements brought to the attention of the Governing Body will be rectified without delay.
- Effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff and volunteers.

- Information is provided to the Local Authority when requested, for example through the Safeguarding audit.
- The school contributes to inter-agency working in line with statutory guidance “Working Together to Safeguard Children” including providing a co-ordinated offer of Early Help for children who require this.
- The school abides to GDPR.
- The school complies with all legislative safeguarding duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
- Reviewing the [DfE’s filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll) they will seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.

The Governing Body will appoint a lead Safeguarding Governor – **Lewis Bourne** to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The Chair of governors (Lewis Bourne) will act as the ‘case manager’ if an allegation of abuse is made against the headteacher, where appropriate. They receive training in managing allegations for this purpose.

All Governors will read and understand Keeping Children Safe in Education 2025 and all governors will receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Governors will undertake further training relating to Prevent, online filtering and monitoring, cyber-security to support their functions and understand their responsibilities.

Safeguarding Policies and Procedures/Legal Responsibilities and duty to share information

Our safeguarding responsibilities include:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment whether that is within or outside the home, including online.
- Preventing impairment of children’s mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. Children includes everyone under the age of 18. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18 and further guidance regarding definitions and types of abuse can be found at: [Child abuse and neglect | NSPCC Learning](#)

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

The following three **Safeguarding Partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA.
- The chief officer of police for a police area in the LA area.

Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

Every member of staff, including volunteers working with children at our school, is advised to maintain an attitude of *'it could happen here'* where safeguarding is concerned and *'think beyond the obvious'*. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the school's confidential reporting (whistleblowing) policy. Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors. Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC whistleblowing helpline](#).

All staff

All staff will read and understand part 1 and Annex of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct (as part of the staff handbook), the role and identity of the designated safeguarding leads (DSL and DDSL), the behaviour policy, and the safeguarding response to children who go missing from education.
- The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- How to share their concerns with the DSL – at Straits all concerns are shared verbally and then recorded on CPOMs.

- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalization and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalization, and the role of technology and social media in presenting harm.
- The need to reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children.
- That a child and their family may be experiencing multiple needs at the same time.

All staff members will undertake safeguarding and child protection training, online safety training including IT filtering and monitoring roles and responsibilities, together with managing allegations and whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse, neglect and exploitation. This training will be regularly updated and will be in line with local and statutory guidelines.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through fortnightly emails, e-bulletins and staff meetings) as required.

All new staff will receive robust safeguarding training in line with the whole school training package; this will be delivered as part of their induction process before they commence working with our pupils/students.

All volunteers and contractors will receive safeguarding procedures and guidance on their arrival at the school this will include how to report a concern, the behavioural expectations of the visitors to ensure that children are safe alongside appropriate use of mobile technology. Safeguarding information will be provided as required during their time working with the school to ensure that they are compliant. Volunteers and Contractors will receive appropriate training, if applicable.

Staff who have contact with pupils and families.

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Confidentiality

'The Data Protection Act 2018 and 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 promote the welfare and protect the safety of the children.' KCSiE (2025)

Safeguarding information should be treated as confidential and will only be shared as part of the agreed school and Dudley Safeguarding Board protocols.

Key points

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy).

Further guidance is available from *Information Sharing: advice for practitioners providing safeguarding services*.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

Communication with parents

We will adopt an open and accepting attitude as part of our responsibility for pastoral care. Staff will encourage parents/carers to feel free to talk about any concerns and to see school as a safe place when there are difficulties. Concerns will be taken seriously.

In the event of a cause for concern or disclosure, and where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will usually notify the parents of all the children involved.

We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

Managing Concerns

If a child is suffering or likely to suffer significant harm, or in immediate danger, speak directly to the DSL who will make a referral to Dudley Front Door and/or the police. If the DSL is not available, you may contact the police/ Dudley Front Door directly and then tell the DSL as soon as possible that you have made a referral directly.

Dudley Report it page: <https://dudleysafeguarding.org.uk/>

or

Dudley Children's Portal [Dudley Children's Portal](#)

Dudley Front Door: 0300 555 0050 / Out of Hours Duty Team: 0300 555 8574

All Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding concern.

1. The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy designated lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.
2. All concerns about a child or young person should be reported without delay and recorded on CPOMS.

3. The DSL will consider what action to take and have appropriate discussions with parents/carers prior to referral to children's social care or another agency unless, to do so would place the child at risk of harm or compromise an investigation.
4. All referrals will be made in line with local procedures ([Welcome | West Midlands Safeguarding Children Group \(procedures.org.uk\)](http://www.westmidlandsgroup.org.uk))
5. Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Senior Leadership Team or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

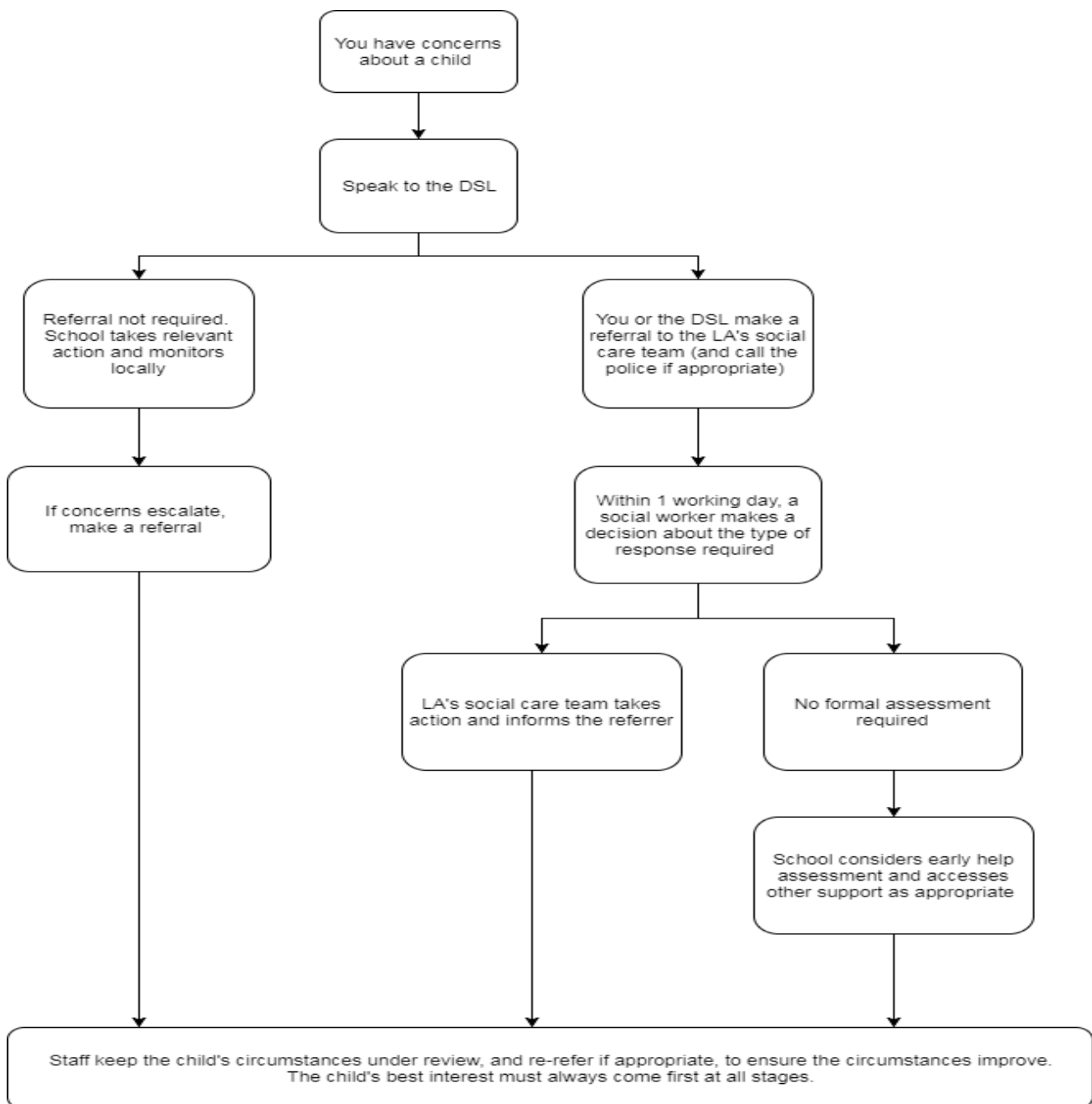
If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Record your conversation, on CPOMs, as soon as possible in the child's own words. Stick to the facts, and do not put your own judgment on it.
- At no time should an individual teacher/member of staff consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures.
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. **SEE DUDLEY'S SAFEGUARDING RESOLUTION AND ESCALATION PROTOCOL**
- Aside from the above professionals, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

It is important to also understand the following:

- ✓ The child may not feel ready or know how to tell someone that they are being abused, exploited or neglected.
- ✓ Not recognise their experiences as harmful.
- ✓ Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
- ✓ None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



Record keeping

Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within the school at the earliest opportunity following a disclosure. The record should include the child's words as far as possible and should be timed and dated. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.

1. Previous child protection records (paper based) are stored securely, with access confined to specific staff, e.g. Designated Safeguarding Leads and the Head Teacher. These are currently located in the Headteacher's office.
2. Child protection records from July 2024 are recorded on CPOMs – a secure safeguarding platform which requires a username and password and two step verification. Access to these files is restricted based on roles within school e.g. DSLs have full access, phase leaders see their phase, class teachers their class.
3. Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals (e.g. child who repeatedly goes missing) and ensuring these are acted upon. Each stand-alone file should have a chronology of significant events.

4. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding & child protection file is forwarded promptly and securely within 5 school days of starting at the new education setting, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
5. Staff understand that 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.
6. We recognise the importance of information sharing between practitioners and local agencies. We have ensured arrangements are in place that set out clearly the processes and principles for sharing information within our school and with Dudley children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.
7. Safeguarding records relating to individual children will be retained in line with our records retention schedule.
8. For recruitment and employment checks records of these are kept in the individual staff files.
9. A record of any allegations made against staff is kept in a confidential file by the Head.

Dudley's Thresholds and Early Help

If early help is appropriate, the DSL/DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Level 1 - No referral is required. Professionals should contact [Dudley's Family information Service](#) on 01384 814398 to obtain information about support available for children, young people and families.

Dudley Safeguarding Partnership threshold guidance is below, this should be considered when completing Request for Help and Support Form.

<https://dudleysafeguarding.org.uk/wp-content/uploads/2023/03/DSPP-Support-Level-Guidance-and-Framework-March-2023.pdf>

[EARLY HELP STRATEGY | healthandwellebeing \(dudleyhealthandwellbeing.org.uk\)](#)

[Early help for children and families | Dudley Council](#)

When to be concerned

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

All staff, but especially the designated safeguarding leads 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 radicalization.

Signs and Symptoms of Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. 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 may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- 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 participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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.
- 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 (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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).
- Ensure access to appropriate medical care or treatment.

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

Specific Safeguarding Issues

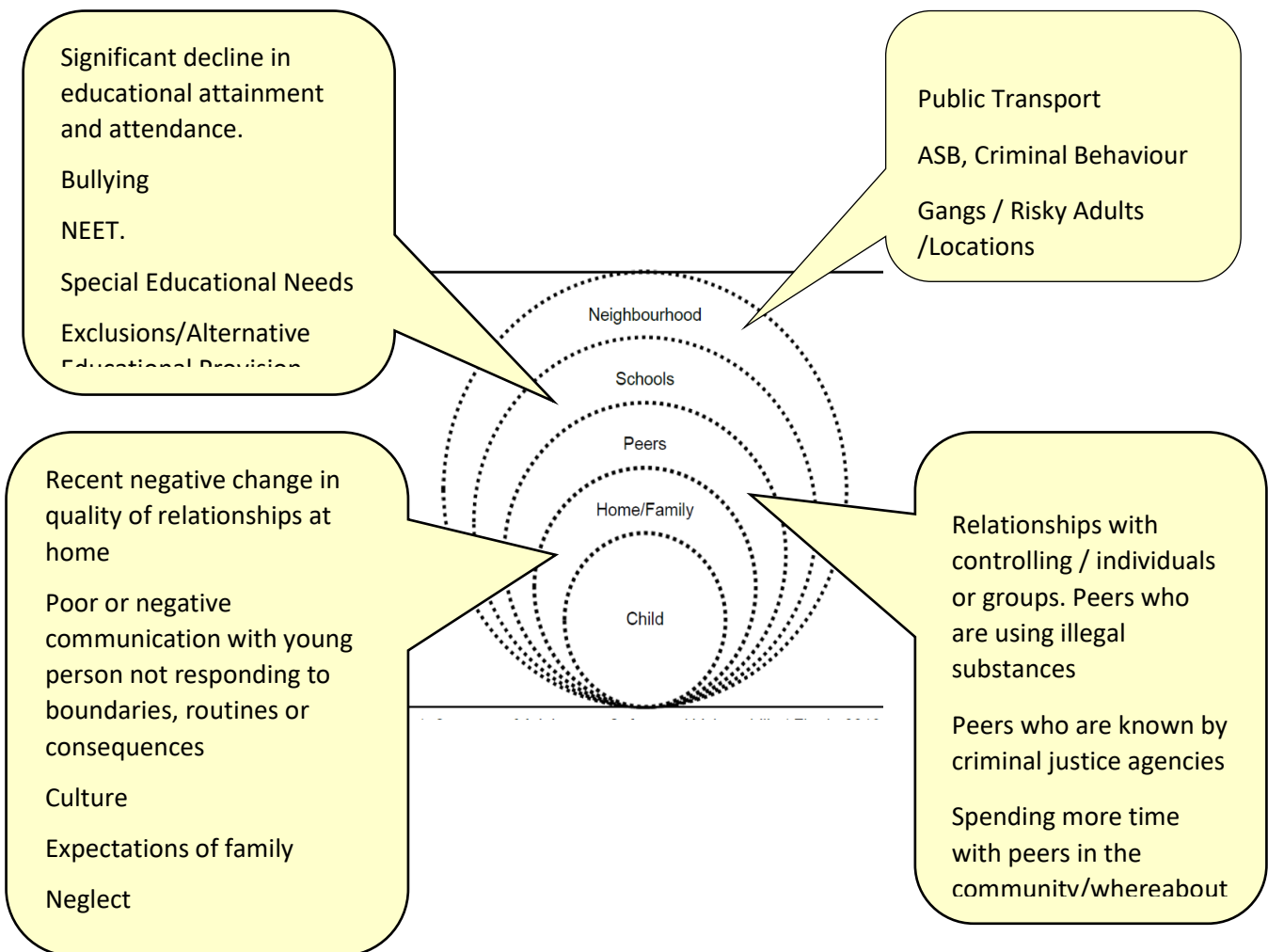
This section is based on the advice in Annex B of Keeping Children Safe in Education.

Annex B also includes information on further issues to be aware of, including children's involvement in the court system, children with family members in prison, and county lines.

Contextualized Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. 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 exploitation, criminal exploitation, and serious youth violence.



Child on child abuse

We recognise that children can abuse their peers. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sharing of nudes and semi-nudes (also known as youth produced sexual imagery); initiation/hazing type violence and ritual abuse and sustained and targeted verbal abuse.

Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including sharing nudes and semi-nudes).

If a pupil makes an allegation of abuse against another pupil:

- Record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the Local Authority Children's Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate.

We will minimise the risk of Child-on-Child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum and values help to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can talk to staff confidentially.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Child on Child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

We will carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response.

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. We will support victims to 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 duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);

Reports of incidents of sexual violence or sexual harassment will be responded to in line with Keeping Children Safe in Education 2025 and the DfE guidance '[Sexual violence and sexual harassment between children in schools and colleges](#)'.

Where a child discloses safeguarding allegations of a serious sexual nature against another pupil in the same setting, the DSL should seek advice from the Local Authority Children's Social Care team before commencing its own investigation or contacting parents. This may mean, on occasions, that the school is unable to conduct its own investigation into such incidents. All serious and any lower-level incidents will be recorded on CPOMs.

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

Children sharing a classroom: Initial considerations when the report is made

Any report of sexual violence is likely to be traumatic for the victim and close proximity with the alleged perpetrator(s) is likely to be especially distressing. The proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes or sharing school premises should be considered immediately. In serious cases, whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school should also consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities). These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

Definition of Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual "jokes" or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos.
- sexualised online bullying.
- unwanted sexual comments and messages, including, on social media.
- sexual exploitation; coercion and threats; and up skirting. ('Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.)

For victims of sexual abuse, the school should follow advice given by Children's Social Care and consider using external agencies, such as Early Help or [West Mercia Rape and Sexual Abuse Support Centre](#) to support any strategies that they may be able to provide within school.

Depending on the nature of abuse, the school may need to consider providing measures to protect and support the victim, the alleged perpetrator and other pupils and/or staff in the school by means of a risk assessment. The risk assessment should be recorded and kept under review.

Sharing Nudes and semi-nudes

Responsibilities when responding to an incident

If you are made aware of an incident involving the sharing of nudes or semi-nudes (also known as 'youth produced sexual imagery' including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video), you must report it to the DSL immediately. You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed).
- What further information is required to decide on the best response.
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any pupil in the imagery is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101.

Recording incidents

All incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 9 of this policy also apply to recording incidents of sharing nudes and semi-nudes.

Female Genital Mutilation - If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises '*all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.*'

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable.
- Finding it hard to sit still for long periods of time (where this was not a problem previously).
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Having frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise or missing PE.
- Being repeatedly absent from school, or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider).
- FGM being known to be practiced in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society.
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”.
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion).
- Being unexpectedly absent from school.

The above indicators and risk factors are not intended to be exhaustive.

Honour Based Abuse (including Forced Marriage)

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Breast ironing

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the ‘ironing’ can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pins, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

Forced Marriage

[Implementation of the Marriage and Civil Partnership \(Minimum Age\) Act 2022](#), Since February 2023 it has 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.

Forcing a person into marriage is a crime. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be trafficked, forced to work in cannabis factories, modern slavery, coerced into moving drugs or money across the country (county lines), involved in gangs and knife crime, forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Involved in gangs and knife crime.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend.
- Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see below))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] 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 schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Signs to look out for

A young person's involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs.

- Are they always going missing from school or their home?
- Are they travelling alone to places far away from home?
- Do they suddenly have lots of money/lots of new clothes/new mobile phones?

- Are they receiving much more calls or texts than usual?
- Are they carrying or selling drugs?
- Are they carrying weapons or know people that have access to weapons?
- Are they in a relationship with or hanging out with someone/people that are older and controlling?
- Do they have unexplained injuries?
- Do they seem very reserved or seem like they have something to hide?
- Do they seem scared?
- Are they self-harming?

What to do if you have concerns a young person is involved in County Lines

If a member of staff suspects a pupil may be involved in county lines, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Further guidance is available in the Home Office's publication ['County Lines: criminal exploitation of children and vulnerable adults'](#).

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma, or Traveller families.
- Come from the families of service personnel.
- Go missing or run away from home or care.
- Are supervised by the youth justice system.
- Cease to attend a school.
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

For further information: Children Missing Education statutory guidance for local authorities 2024 [Children missing education: statutory guidance for local authorities and schools - GOV.UK](#)

<https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Make initial efforts to locate the child (involving known adults and members of the SLT).
- Contact the parent to inform them that their child is deemed missing and we do not know their whereabouts.
- In consultation with the parent, make a decision of when to contact the police (this will vary depending on the age of the child, the time of the day, the length of time missing).
- Designate roles to support the procedure – searchers, police/parent contact lead.
- Once the child is located all services/people involved will be informed and the child kept safe with a familiar adult.

Elective Home Educated

Many home educated children have an overwhelmingly positive learning experience. We expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, we know this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended, we must inform our LA of all deletions from our admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work together to coordinate a meeting with parents/carers/Local Authority where possible.

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. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. <https://www.nicco.org.uk/>

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSLs will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of sex or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. West Midlands police forces are part of [Operation](#)

Encompass. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

The DSL will provide support according to the child's needs and update records about their circumstances.

Radicalisation and Extremism

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or
 - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSLs will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities, they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.

- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour, staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our reporting procedures including discussing their concerns with the DSL. Staff should **always** act if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our Preventing Extremism and radicalisation policy, behaviour policy and online policy.

Dudley's LA Prevent Officer is Mark.Wilson@dudley.gov.uk

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist-related.

Mental Health - If you have a mental health concern

All staff should also be 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.

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

If staff have a mental health concern about a child, they will discuss this with either the Senior Mental Health Lead (Paul Freear) or SENCo (Emma Vellender). **If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL.**

The use of 'reasonable force' in schools and colleges

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means

'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

- At Straits, identified staff (Paul Freear and Daniel Wade) have completed Positive Handling Training (Team teach) refreshed every three years.
- Departmental advice for schools is available <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

Private fostering - LA notification when identified

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases, so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible. If we become aware of a privately fostering arrangement, we will check that Children's Services have been informed.

LGBT+ pupils

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

Staff should be aware that pupils may subject to homophobic, bi-phobic or transphobic bullying or negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide or homelessness. Several studies also evidence that LGBT+ young people may be at increased risk of becoming victims of CSE.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavor to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. (Para 203). Schools should also ensure that they are aware of the increased risk factors and know how to access appropriate support for these young people when required.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Online Safety

Please refer to our online safety policy.

Straits Primary School aims to ensure that children are safeguarded from potentially harmful and inappropriate online material. Our curriculum and technology provision develops opportunities for us to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

•**content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

•**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:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

•**commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group

We ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures including how online safety is reflected in other relevant policies. We consider online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and engaging with parents to raise an awareness in order to support their children.

Named Designated Person for Children in Care (CiC)

At Straits, the Designated Person is Paul Freear who is responsible for promoting the educational achievement of Children in Care and previous Children in Care in line with [statutory guidance](#).

As part of their role, the designated teacher will:

- Complete appropriate training and work in partnership with the Virtual School on how funding can best support the progress of a CiC.
- Work closely with the all staff to ensure that any safeguarding concerns regarding Children in Care and previous Children in Care are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of, Children in Care and previous Children in Care, including discussing how pupil premium plus funding can be best used to support CiC and meet the needs identified in their personal education plans.

We will ensure that staff have the skills, knowledge and understanding to keep Children in Care and previous Children in Care safe. We will ensure that:

- Appropriate staff have relevant information about Children in Care's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.

Named Virtual Head – Emma Thomas Emma.Thomas@dudley.gov.uk

Children with a social worker

Children may need a social worker due to safeguarding or welfare needs. 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 vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Children with Special Educational Needs and Disabilities

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.

- Pupils being more prone to peer group isolation than other pupils.
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

We offer extra pastoral support for pupils with SEN and disabilities. This includes: in class support, support from senior leaders and the SENCo or referral to our counselling service.

Safer Recruitment procedures

The governors at Straits Primary School are committed to safeguarding the welfare of our children and our Safer Recruitment policy has been drafted in accordance with the most recent “Keeping Children Safe in education” and “working together to safeguard children” DfE guidance and Local Authority Guidance.

Safeguarding and promoting the welfare of children is an integral factor of school management. We will protect children and promote their welfare by:

- providing a safe environment for children to learn in;
- preventing unsuitable people from working with children;
- having systems and processes that ensure children are kept safe and allow for poor and unsafe practice to be challenged;
- contributing to effective partnership working between all those involved with providing safeguarding services for children.
- ensuring that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

The Head teacher, with support from the SLT, is responsible for the internal organisation, management and control of the school. However, all staff and volunteers have an integral responsibility in ensuring that the school environment is safe and secure for children and that appropriate procedures are followed. At Straits, the minimum requirement is that the Head teacher, Deputy Headteacher and one governor have completed Safer Recruitment training; the school’s ideal is that all members of the Personnel Committee have completed safer recruitment training. At least one of these persons should sit on all staff recruitment panels. The school will access both the Local Authority and the NSPCC safer recruitment training (<https://learning.nspcc.org.uk/training/safer-recruitment-education>).

Safer Recruitment procedures will include:

- Vacancies will be advertised through external media (<https://www.wmjobs.co.uk/>, <https://www.gov.uk/find-teaching-job> and the school website) and will include a job description, person specification and detail the closing date. In line with KCSiE 2025 guidance, a curriculum vitae (CV) will only be accepted alongside a full application form.
- All advertisements, job descriptions, and person specifications will include a statement of the school's commitment to and responsibility for safeguarding and promoting the welfare of children.
- Completion of a standard application form including declaration of convictions.
- Face-to-Face interview whereby the individual is asked as to whether or not they have any convictions/cautions/bind-overs and we verify the candidate’s mental and physical fitness to carry out their work responsibilities. (A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.)
- The identity of all successful applicants will be verified and qualifications, ISA Barred List check, right to work in UK, self-declaration and DBS checks carried out. The results of these checks will be recorded on the school's single central record. If, for some reason the applicant fails to produce appropriate documentation at the interview, they must produce this at the earliest possible opportunity.
- Self-disclosure and disqualification self-declaration form completed at interview stage.
- Barred List check
- Completion of Health Declaration forms.
- Receipt of 2 **satisfactory** references, scrutinised for discrepancies, anomalies and gaps in employment
- Qualifications and verification of professional status (where relevant). The Teacher Services’ system should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

- We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Procedure for dealing with Allegations about Staff - Concerns about a staff member, supply teacher or volunteer

All staff are mindful of the position of trust that they are in when working within an education setting. They need to comply with guidance about conduct and safe practice, including safe use of mobile phones.

Allegations or concerns about staff conduct will be taken seriously and followed up in a transparent and timely way. Referral to the Headteacher or Chair of Governors should be made where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

If an allegation is made which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the Headteacher, unless the allegation concerns the Headteacher, in which case the Chair of Governors (Lewis Bourne) will be informed immediately. Where the Headteacher is the sole proprietor, the allegation will be reported directly to the Local Authority Designated Officer (LADO - **Yvonne Nelson-Brown or Sukhchandan Kaur 01384 813110, Yvonne.nelson-brown@dudley.gov.uk or Sukhchandan.Kaur@dudley.gov.uk**). The Headteacher (or Chair of Governors) on all such occasions will discuss the content of the allegation with LADO, prior to undertaking any investigation. The school will follow Local Authority procedures for managing allegations against staff, a copy of which is available in school. The Head teacher (or Chair of Governors) will be guided

by the LADO and an HR consultant when considering suspension or other neutral protective steps. The schools must work with other agencies to investigate when a member of staff has **“behaved or may have behaved in a way that indicates they may not be suitable to work with children”**.

Publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law; this includes verbal conversations or written material including content placed on social media sites.

Schools as employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the school or college are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers, see paragraphs on supply teachers below). It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Supply Teachers

In some circumstances schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business.

Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children’s social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

Low Level Concerns

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

Staff are also encouraged to feel confident to self-refer if they feel that they have been in a situation which could be misinterpreted as being compromising or if they feel that they may have behaved in a way that falls below the expected standards of professionalism.

Whistleblowing

The school has adopted the local authority whistle blowing policy.

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the school's whistleblowing policy. Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors. Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC whistleblowing helpline](#) (Staff can call 0800 028 0285 – line is available from 8:00 am to 8:00 pm, Monday to Friday and email: help@nspcc.org.uk)

Safeguarding in the Curriculum

We will include in the curriculum activities and opportunities (specifically through PSHRE/computing) which equip children with the skills they need to stay safe from abuse (including online) and to know where to get help. Our curriculum and values will help to educate pupils about appropriate behaviour and consent and develop opportunities for us to educate pupils in their use of technology.

We teach safeguarding:

- through our PSHRE curriculum;
- by subscribing to national initiative such as Anti bullying week, Internet Safety week, Mental health week;
- through school and local initiatives;
- through our focus on British and school values (Pathways to the Future)
- through our assemblies

Our Safeguarding Policy cannot be separated from the general ethos of our school which ensures that all our pupils are treated with respect and dignity, taught to treat others with respect, they feel safe, have a voice and are listened to.

Special Circumstances

Checking identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will always be accompanied by a member of staff. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact parents or other contacts on the emergency contact list in order to find someone who is able to collect the child. School will ask parents to provide at least two emergency contacts for their child.

If there is no one available to collect the child the head or deputy will contact children's services and will follow procedures that they give us. The incident will be recorded on CPOMs.

Use of School or College Premises for Non-School/College Activities

We will ensure that when we hire out our school facilities/premises to organisations or individuals (for example to community groups, sports associations and service providers to run community or extra-curricular activities) appropriate arrangements are in place to keep children safe. When services or activities are provided under the direct supervision or management of our school the arrangements for child protection will apply.

Where an external body is providing community or extra-curricular activities we will seek assurance that appropriate safeguarding and child protection policies and procedures in place (including inspecting these

as needed); we will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Other Relevant Policies

The Governing Body's statutory responsibility for safeguarding the welfare of children goes beyond compliance with child protection procedures. The safeguarding duty is relevant for the discharge of all functions and activities. This policy needs to be considered in conjunction with the following policies:

- Behaviour Policy
- Staff Code of Conduct (within Staff handbook)
- Child on Child abuse including Anti-Bullying
- Positive Handling
- Special Educational Needs
- Looked After and Previously Looked After Children
- Educational Visits
- First Aid and the Administration of Medicines
- Health and Safety
- PSHE
- Site Security
- Lock Down procedures
- Fire Evacuation Plan
- Complaints Procedure
- Intimate Care
- Equalities policy
- Online Safety
- Information and Cyber Security Policy for Schools
- Drugs education
- Children Missing in Education
- Extended School Activities
- Preventing Extremism and Radicalisation
- Safer Recruitment
- Whistleblowing
- Early Help Offer
- Well-being