



# Safeguarding and Child Protection Policy

September 2026

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| Policy reviewed                 | August 2026 |  |
| Date approved by Governing Body |             |  |
| Next review date                | August 2027 |  |

## Key Personnel

| Role                                         | Name                         | Contact details                                                                                                                      |
|----------------------------------------------|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Headteacher*                                 | Hannah McGrath               | 01743860400<br>head@hanwood.shropshire.sch.uk                                                                                        |
| Designated Safeguarding Lead (DSL)*/**       | Hannah McGrath               | 01743860400<br>head@hanwood.shropshire.sch.uk                                                                                        |
| Deputy DSL(s)*/**                            | Lucy Jones<br>Amy Taylor     | 01743860400<br><a href="mailto:admin@hanwood.shropshire.sch.uk">admin@hanwood.shropshire.sch.uk</a><br>sbm@hanwood.shropshire.sch.uk |
| Designated Teacher for Looked After Children | Hannah McGrath               | 01743860400<br>head@hanwood.shropshire.sch.uk                                                                                        |
| Mental Health Lead                           | Hannah McGrath<br>Lucy Jones | 01743860400<br>head@hanwood.shropshire.sch.uk                                                                                        |
| Online Safety Co-Ordinator/Lead              | Hannah McGrath               | 01743860400<br>head@hanwood.shropshire.sch.uk                                                                                        |
| Relationship Sex Health Education Lead       | Hannah McGrath               | 01743860400<br>head@hanwood.shropshire.sch.uk                                                                                        |
| Chair of Governors*                          | Geraint Phillips             | 01743860400<br>admin@hanwood.shropshire.sch.uk                                                                                       |
| Safeguarding Governor/Trustee                | Roger Evans                  | 01743860400<br>admin@hanwood.shropshire.sch.uk                                                                                       |
| SENCO                                        | Hannah McGrath               | head@hanwood.shropshire.sch.uk                                                                                                       |

\*Out of hours contact details will be made available to staff

\*\*Any changes to key personnel/holiday/emergency contacts will be shared with the appropriate agencies and Safeguarding Partnerships.

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## Policy Scope and Aims

This policy applies to anyone working on behalf of St Thomas and St Anne's CE Primary School including senior managers and the governing body, staff, volunteers, contractors, agency staff and students.

The policy is publicly available on the school website (or on request from the school office) so that it can be accessible for our children; their families and anyone visiting and /or working with us.

The policy aims to meet the requirements as outlined in Part 2 [Keeping children safe in education](#) and

## Safeguarding Statement

We believe that:

- All children have the right to protection from all types of abuse, neglect, exploitation and/or harm.
- Everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

This means that we will:

- Not tolerate the abuse, neglect or exploitation of children. This includes never accepting, dismissing or tolerating and always challenging or raising concerns about words or actions which downplay, justify, or promote discrimination, abuse, neglect, exploitation and/or harm; including child-on-child abuse (including harassment and violence). This applies to anyone who is part of, comes into or works with our school.
- Be child centred <sup>1</sup>and ensure that we consider the best interests of children in everything that we do. This includes ensuring that we enable children's voices and experiences to be heard (using communication tools and advocacy if necessary); and that children are involved in and informed about the decisions being made about them.
- Ensure we provide a safe environment for children to learn, grow and develop and feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse, neglect, exploitation and/or harm of a child.
- Ensure no child or group of children are treated less favourably by us than others. This means being inclusive, anti-discriminatory and responsive to the needs and experiences of children and families, particularly those who are in group or communities who are more likely to experience discrimination.
- Recognise that bias can be a barrier to safeguarding practice including professional curiosity; which can adversely impact children in some groups or communities.
- Take extra positive actions that may be needed to safeguard and promote the welfare of a child(ren) who we know are more vulnerable to experiencing abuse, neglect, exploitation, harm or discrimination.
- Work in partnership with our children, their parents, carers, and other agencies.

## Key Terms

**Safeguarding** and promoting the welfare of children is defined in Working Together to Safeguard Children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether this is within or outside of 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;

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<sup>1</sup> See [Working Together to Safeguard Children](#): Chapter 1: A child centred approach

- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes<sup>2</sup>:

**Child Protection** is a part of safeguarding and promoting welfare. It refers to the specific activity that is undertaken to protect specific children who are suspected to be suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including physical abuse, sexual abuse, emotional and psychological abuse, coercive and controlling behaviour and economic or financial abuse, where they see, hear, or experiences its effects.

Children may be abused in a family or in an institutional or extra-familial context 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 another child or children. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession.

There are a number of types of abuse and safeguarding issues that could increase the risk that a child could be abused. These are further defined and explained in Part 1, Part 5 and Annex A of [Keeping children safe in education](#)

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent in either a paid or voluntary capacity. The exception to this term is Governors/Trustees.

**Governors/Trustees** refers to those who are part of the School's Governing Body. This includes individuals who are at Trust or Charity governing body level as well as part of local school governance bodies.

**Child** includes everyone under the age of 18.

A **Parent** refers to birth parents and others who have parental responsibility (as defined by the Children's Act 1989) or has care of a child.<sup>3</sup>

**Data protection laws** refer collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

## Legislation, Standards and Guidance

This policy is based on the following legislation, guidance, standards, and procedures:

| Legislation                                                                                                                                                                                         | Statutory National Guidance/Standards                                                                                                                                                             | Local Procedures                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• <a href="#">Education Act 2002 Section 175 (maintained schools only)</a></li> <li>• <a href="#">Education Act 2002 Section 157 (Independent</a></li> </ul> | <ul style="list-style-type: none"> <li>• <a href="#">Keeping Children Safe in Education</a> and any legislation or guidance (statutory/non-statutory)outlined or referenced within it.</li> </ul> | <ul style="list-style-type: none"> <li>• <a href="#">Shropshire Safeguarding Community Partnership Family Help Together - A Framework for Action</a></li> <li>• <a href="#">Shropshire Safeguarding Community Partnership West</a></li> </ul> |

<sup>2</sup> [Children's social care: national framework - GOV.UK \(www.gov.uk\)](#)

<sup>3</sup> S576 Education Act 1996

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| <a href="#">schools incl Academies and CTC's)</a> <ul style="list-style-type: none"> <li>• <a href="#">Children Act 2004</a></li> <li>• <a href="#">Children's Wellbeing and School's Act 2026</a></li> </ul> | <a href="#">Early years foundation stage (EYFS) statutory framework - GOV.UK</a> <ul style="list-style-type: none"> <li>• <a href="#">Working Together to Safeguard Children</a> and any legislation or guidance (statutory or non-statutory) outlined or referenced within it.</li> </ul> | <a href="#">Midlands Safeguarding Children Procedures</a> <ul style="list-style-type: none"> <li>• <a href="#">Shropshire Safeguarding Community Partnership. Allegations about staff/volunteers</a></li> </ul> |
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## Linked Policies

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| <ul style="list-style-type: none"> <li>• Behaviour/Anti-Bullying Policy/ Physical intervention</li> <li>• Staff Behaviour Policy / Code of Conduct</li> <li>• Whistleblowing</li> <li>• Health &amp; Safety</li> <li>• Allegations against staff</li> <li>• Attendance</li> <li>• Curriculum</li> <li>• PSHE and RSHE</li> <li>• Complaints</li> <li>• SEND</li> <li>• Remote Learning</li> </ul> | <ul style="list-style-type: none"> <li>• Administration of first aid/medicines</li> <li>• Online Safety, including staff use of mobile phones/ devices with imagery and sharing capacity.</li> <li>• Risk Assessments</li> <li>• Safer Recruitment</li> <li>• Disciplinary and grievance</li> <li>• Intimate Care and Nappy Changing Policy</li> <li>• Safer Eating Policy</li> <li>• Lockdown Policy</li> <li>• Radicalisation and Extremism Policy</li> <li>• Preventing extremism risk assessment</li> <li>• Data Protection/GDPR Guidance</li> <li>• <a href="#">EYFS Policy</a></li> <li>• <a href="#">Late Collection Policy</a></li> </ul> |
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## Roles and Responsibilities

We follow the statutory guidance as set out in the latest [Keeping children safe in education](#) (and associated documents and guidance); adhering to the roles and responsibilities and expectations identified for:

### **The Governing Body/Proprietors/Management Committee:**

Have a strategic leadership responsibility for ensuring we take a whole school approach to safeguarding arrangements as outlined in this policy and that we comply with our duties under [Legislation and Guidance](#). Part 2 [Keeping children safe in education](#) that outlines their key responsibilities.

The Safeguarding Governor is responsible for leading on the governance oversight of safeguarding arrangements; regularly meeting with the Designated Safeguarding Lead at least once per term and reporting back to the Governing Body Committee through sharing minutes of minutes and link governor reports to the FGB.

The Chair of the Governing Body/Proprietors/Management Committee will liaise with the Local Authority in the event of an allegation of abuse made against the Headteacher in line with [Ensuring safe staff](#) .

All Governors/Trustees will ensure:

- The school has a Designated Safeguarding Lead who has the appropriate status, authority, skills and experience to carry out duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- Continuity of safeguarding responsibilities if the Designated Safeguarding Lead is unavailable due to illness, leave, or other circumstances.

- The school has safeguarding policies and procedures in place (as outlined in Part 2 [Keeping children safe in education](#) and [Early years foundation stage \(EYFS\) statutory framework](#) ) that are implemented effectively and comply with our duties under [Legislation, Standards and Guidance](#) at all times.
  - All staff and governors are knowledgeable and confident in carrying out their safeguarding duties in line with [Professional development and support](#).
  - That the effectiveness and implementation of safeguarding arrangements are robustly overseen by the Governing Body Committee by that safeguarding reports are received by governors at least annually. Safeguarding is discussed termly at Health and Safety Committee, having a dedicated link governor who produces link governor reports for safeguarding as well as having oversight of the annual Safeguarding Audit and Prevent Risk Assessment and audit.

### **The Headteacher:**

Is responsible (with the lead support of the Designated Safeguarding Lead) for ensuring safeguarding arrangements are implemented effectively in school.

This includes:

- Having the overarching responsibility of ensuring the effectiveness of our school safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the Governing Body (with the support of the Designated Safeguarding Lead) on the effectiveness of school safeguarding arrangements.
- Supporting and promoting a whole school safeguarding culture and ethos as outlined in our [Safeguarding Statement](#). This includes ensuring that the Senior Leadership Team work effectively together and with the Designated Safeguarding Lead, to ensure a whole school approach to safeguarding.
- Take the lead role in [Ensuring Safe Practice](#); including ensuring staff are knowledgeable and confident in their safeguarding practice; including making sure that their practice is in line with national and local requirements. The Headteacher is also the lead person responsible for receiving, managing, and referring to/lauding with the Local Authority Designated Officer (with the support of the Designated Safeguarding Lead) or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the Designated Safeguarding Lead and any deputy(ies) to carry out their roles effectively. This means ensuring that they have the appropriate status, authority, skills and experience to carry out duties of the post and are given sufficient time, training, support, resources. They should also ensure continuity of safeguarding responsibilities if the Designated Safeguarding Lead is unavailable due to illness, leave, or other circumstances.
- Ensuring that all school policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff.
- Ensuring they notify Ofsted of any changes as outlined in [Early Years Foundation Stage Statutory Framework](#)
- Ensuring that school policies and procedures relating to site safety and health and safety guidance and relevant legislation are in place which are referenced in [Keeping Children Safe in Education](#) and the [Early Years Foundation Stage Statutory Framework](#) and local arrangements are, implemented and followed by all staff. This includes:
  - Guidance for sport participation (Keeping Children Safe in Education Part 2)
  - Regulations and safeguarding requirements relating to school premises (Keeping Children Safe in Education Part 2)
  - Boarding and residential accommodation; including on educational visits (Keeping Children Safe in Education Part 2)
  - Appropriate health arrangements are in place and adhere to requirements outlined in [Safeguarding children with medical conditions](#) and the Health section in [Early Years Foundation Stage Statutory Framework](#).

- Safety and suitability of premises, environment and equipment, Staff:child ratios and before/after school care and holiday provision ([Early Years Foundation Stage Statutory Framework](#)).
- Adherence to the [Prevent Duty](#) and Terrorism (Protection of Premises) Act 2025: aka “[Martyn’s Law](#)”
- The Local Authority are [notified of significant events and major changes](#).

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

Takes the lead responsibility for safeguarding and child protection in our school. Annex B [Keeping children safe in education](#) outlines their key responsibilities. Our Deputy Designated Safeguarding Lead(s) (hereafter referred to as DDSL) support the Designated Safeguarding Lead in the discharge of their responsibilities.

Responsibilities include:

- Ensuring that the school has a child protection policy in place as required by [Keeping children safe in education](#) and [Early years foundation stage \(EYFS\) statutory framework](#), that is implemented and followed by all staff.
- Being available to deal with safeguarding and child protection during school hours.
- Acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and to our school.
- Supporting the Headteacher to [Ensure Safe Practice](#) in school.
- Managing safeguarding referrals to the Local Authority; Police, and any other statutory authorities or multi-agency risk management arrangements (see [Designated Safeguarding Lead Response](#)).
- Working closely with the Governing Body, Headteacher and relevant senior leadership team members to ensure a whole school safeguarding culture and ethos as outlined in our [Safeguarding Statement](#) and the implementation of effective safeguarding arrangements, as outlined in this policy.
- Acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership arrangements as outlined in [Working in Partnership](#).
- Ensuring children and parents are aware of how and encouraged to raise safeguarding concerns and how they will be responded to as outlined in [Working in Partnership](#).
- Act as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in school.
- Ensuring the effective management and oversight of safeguarding information as outlined in [Record Keeping and Information Security](#).
- Maintaining and access [Professional development and support](#).
- 

### **All staff (including students and volunteers):**

Are expected to work in line with our [Safeguarding Statement](#) and adhere to the policies, processes and systems that support safeguarding as outlined in this policy. This specifically includes:

- Accessing and maintaining [Professional development and support](#) to ensure they remain knowledgeable and confident in their safeguarding practice.
- Recognise, Respond and Report [Staff Safeguarding Concerns](#)
- Engaging in [Safe Practice](#). This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of children as outlined in [Ensuring safe staff](#).
- [Teaching our children how to keep safe](#)

## **Professional development and support**

To ensure all our staff and governors are knowledgeable and confident in keeping children safe in our school; they will complete the professional development activities as outlined below. We monitor professional development activities and maintain a central professional development record.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s) provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal, and performance processes in school. The Designated Safeguarding Lead (and deputy(ies)) receive regular support and supervision from link local authority Headteacher as well as support from the local Early Help development officer.

### All Staff (including volunteers)

| Activity                                                                                                                                                                                                                                                                                                                                                                            | Frequency                                                                                                                         |
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| Receive information on school safeguarding arrangements and procedures as outlined in <a href="#">Keeping children safe in education</a>                                                                                                                                                                                                                                            | Induction or when arrangements/procedures are updated.                                                                            |
| Read <a href="#">Keeping children safe in education</a> <ul style="list-style-type: none"> <li><b>All Staff:</b> Part 1, Part 5 and Annex A.</li> <li><b>Senior Leadership Team:</b> Entire document</li> <li><b>EYFS Staff &amp; Senior Leadership Team:</b> Section 3 <u>Early years foundation stage (EYFS) statutory framework</u>(group and school based providers)</li> </ul> | Induction then annually (in Autumn Term) or when updated.                                                                         |
| Complete Safeguarding Awareness Training to enable staff to <a href="#">recognise, respond to and report safeguarding (including online safety and child-on-child abuse; including harassment and violence) concerns</a>                                                                                                                                                            | Induction and then every 2 years                                                                                                  |
| <b>Teaching and early years staff as a minimum:</b> Complete FGM training appropriate to role (see <i>Local Authority Safeguarding in Education Training Statement</i> at: <a href="#">Safeguarding in Education Training/Networks   Shropshire Learning Gateway</a> )                                                                                                              | Induction and then every 2 years                                                                                                  |
| Complete Prevent Awareness Training <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a>                                                                                                                                                                                                                                      | Induction and then refreshed annually.                                                                                            |
| Complete Cyber Security Training: <a href="#">Cyber security training for school staff - NCSC.GOV.UK</a> and specific advice for early years settings at: <a href="#">Early Years practitioners: using cyber security to protect your settings   National Cyber Security Centre</a>                                                                                                 | Induction and then annually                                                                                                       |
| Receive regular national and local safeguarding updates (including those relating to online safety); to help maintain basic skills and keep up to date with any changes to safeguarding procedures or as a result of any safeguarding concerns that occur in the setting                                                                                                            | As required and at least annually via inset training. Also at other points during the year via email/memos/posters/staff meetings |

### Designated Safeguarding Leads (including any deputies)

| Activity (in addition to all staff above)                                                                                                                                                                                                                                                                               | Frequency                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Complete Designated Safeguarding Lead Training to a standard as outlined in KCSiE Annex B and EYFS Annex C and in line with local arrangements (see <i>Local Authority Safeguarding in Education Training Statement</i> at: <a href="#">Safeguarding in Education Training/Networks   Shropshire Learning Gateway</a> ) | On induction in role and then every 2 years                         |
| Read <a href="#">Keeping Children Safe in Education</a> in its entirety.                                                                                                                                                                                                                                                | Induction into role then annually (in Autumn Term) or when updated. |
| Complete Prevent Referral Training (training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a> . and DSL specific packages (including EYFS and Independents) at <a href="#">Regional Prevent education co-ordinators - GOV.UK</a>                 | On induction and then every 2 years                                 |

|                                                                                                                                                                                                                                                                                                                                                    |                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Complete Brook Traffic Light Training to support assessment of children's sexual behaviour (including harmful sexual behaviour, child-on-child sexual harassment and violence)<br><i>Local Authority Safeguarding in Education Training Statement at <a href="#">Safeguarding in Education Training/Networks   Shropshire Learning Gateway</a></i> | On Induction and then every 2 years                                     |
| Complete Operation Encompass <a href="#">Online National Key Adult Training</a>                                                                                                                                                                                                                                                                    | At least once and before Operation Encompass referrals can be received. |
| Maintain knowledge and development relating to the role of DSL; including keeping up to date with local arrangements - LA<br><i>Safeguarding Network Meetings See Local Authority Safeguarding in Education Training Statement at: <a href="#">Safeguarding in Education Training/Networks   Shropshire Learning Gateway</a></i>                   | As required, but at least annually                                      |

### All Governors/Trustees

| Activity                                                                                                                                                                                                                                                                                                                                        | Frequency                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| Complete Governor Training to equip them with the knowledge to carry out their strategic <a href="#">Roles and Responsibilities</a> .<br><br><i>(see Local Authority Safeguarding in Education Training Statement at: <a href="#">Safeguarding in Education Training/Networks   Shropshire Learning Gateway</a>)</i>                            | Induction and then every 2 years                                     |
| Read <a href="#">Keeping Children Safe in Education</a><br><ul style="list-style-type: none"> <li><b>All Governors/Trustees:</b> Part 1; Part 2 and Annex A.</li> <li><b>Chair &amp; Safeguarding Link Governors/Trustees:</b> Entire document</li> </ul>                                                                                       | Induction into role then annually (in Autumn Term) or when updated). |
| Complete Cyber Security Training ( <i>training packages are available at: <a href="#">Cyber security training for school staff - NCSC.GOV.UK</a></i> )                                                                                                                                                                                          | Induction and then annually                                          |
| Complete Prevent Training appropriate to role ( <i>see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a> and Governor specific packages (including EYFS and Independents) at <a href="#">Regional Prevent education co-ordinators - GOV.UK</a></i> ) | Induction and every 2 years.                                         |

### Staff/Governors involved in recruitment of staff (including administration)

| Activity (in addition to other relevant above)                                           | Frequency                                                           |
|------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Read Part 3: <a href="#">Keeping Children Safe in Education</a>                          | Induction into role then annually (in Autumn Term) or when updated. |
| Complete appropriate safer recruitment training (that is in alignment with Part 3 KCSiE) | Induction and every 3 years (or when KCSiE Part 3 is updated)       |

## Ensuring Safe Practice

### Safer recruitment

We adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in our setting. All staff/governors involved in recruitment complete additional safer recruitment training; as outlined in [Professional development and support](#). Our recruitment procedures are outlined in our Safer Recruitment Policy and are in alignment with [Keeping children safe in education](#): Part 3 and EYFS Part 3.

As part of our recruitment and selection processes; we ensure that our commitment to safeguarding and promoting the welfare of children is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. This policy is included in the application information for candidates. We also ensure that all applicants complete a robust application form. We seek suitable references and carry out online social media checks prior to

interview; as well as ensure that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

We maintain a record of information we have received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and salaried students); Governors; [contractors](#); and [visitors](#) who attend our school in a professional capacity. We complete the checks on staff, volunteers, and Governors who we recruit ourselves. For those who are recruited by others (such as supply staff and fee-funded students); we ensure that we receive written confirmation of the relevant checks completed and check their identification before they are allowed to work unsupervised or engage in regulated activity with children. See also [Contractors](#) and [Visitors](#).

Where we do not have all the necessary information or there are gaps in the information; we have robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability does not work unsupervised or engage in regulated activity with children. We do not allow individuals to begin working or volunteering (including acting as a Governor) to work for us until we have received and reviewed their enhanced criminal records check and barred list check. We reserve the right to refuse access to the school site any person who we are not assured is safe to work at or visit our school or engage in regulated activity with children.

On appointment; staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge, but also clarity on the expected standards of behaviour within and outside of school; as outlined in our Staff Code of Conduct (which is available on request). Please also see [Professional development and support](#) and [Ensuring safe staff](#)

## **Contractors**

We have several contracts with external providers (including [Alternative Providers](#)) to work in or with our school including with children. All contractors/providers used by our school are required to provide written confirmation that DBS checks and other relevant employment checks, as outlined in [Keeping children safe in education](#) have been successfully undertaken. A record of these checks are kept securely and updated regularly. Details of contractors used are stored on the signal central register. All contractors photographic ID are checked upon arrival.

We will follow our [Ensuring safe staff](#) procedures if we become aware of any allegations relating to a contractor.

## **Visitors**

We have a range of visitors to our school; including professional visitors, children's family members or others attending school events. All visitors to our school are expected to act in accordance with our [Safeguarding Statement](#) and our Visitor Code of Conduct. Our Headteacher (or member of the SLT) can use their professional judgment and decides whether any visitor is allowed access to the school site or needs to be escorted or supervised. We ensure that we have control over who comes into the premises so that no unauthorised person has unsupervised access to children.

We check the identification of visitors and make sure that professional visitors who attend our school have had the appropriate DBS check depending on the activity they are there to carry out; or that the visitor's employers have confirmed that their staff have appropriate checks. We do ask to see DBS certificates when we have received the necessary confirmation.

When external speakers or visitors attend our school premises (whether for school or [non-school activities](#)); we conduct due diligence checks to ensure that their views and delivery of material continues to ensure our school is a safe place. This continues to ensure we are [Teaching our children how to keep safe](#); as well as promoting fundamental British Values and community cohesion (please also see [Preventing Radicalisation](#)).

We will follow our [Ensuring safe staff](#) procedures if we become aware of any allegations relating to a professional visitor.

We follow guidance as recommended by the [Educate Against Hate advice on hosting external speakers](#) resource as well as using speakers who have been recommended by Shropshire's Agreed Syllabus and other trusted sources. All external speakers will be supervised during their visit to our school and whilst working with our children.

### **Use of school premises for non-school activities**

When we have arranged extra-curricular activities out of school hours which are under the direct supervision or management of school staff, this safeguarding policy is to be followed and any concerns should be managed in accordance with [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#).

We will follow our [Ensuring safe staff](#) procedures if we become aware of any allegations relating to an organisation or individual using our school premises.

Where we have sessions or activities which are provided by another person or organisation that is using the school site and not during school time or under direct supervision, we seek assurances that they have the required child safeguarding arrangements in place as an individual/organisation as outlined in [Keeping children safe during community activities and Visitors](#). This is regardless of whether children who are on roll at our school access the activity or not.

The arrangements for this will be set out within any transfer of control agreement, (i.e. lease or hire agreement); and failure to comply with these arrangements will lead to termination of the agreement.

### **Ensuring safe staff**

Staff are expected to act in line with this section when any safeguarding concerns or allegations arise for the following:

- Employed staff
- Supply Staff
- Trainee teachers
- Volunteers
- Governors/Trustees
- Contractors
- Professional Visitors
- Organisations or Individuals using school premises for non-school activities

As further outlined in [Roles and Responsibilities](#) the Headteacher with the oversight of the Governing Body are responsible for ensuring the safety of the staff and volunteers working for, at or on behalf of our school; irrespective of whether they are employed by us or another employment agency or business/charity.

In some circumstances we will have to consider an allegation against an individual not directly employed by us; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business/charity. Where this applies, we share safeguarding responsibilities with the employment agency or business charity.

#### **Supply teachers, trainee teachers and all contracted staff**

We have safeguarding responsibilities when it comes to supply teachers, trainee teachers and all contracted staff and will follow [Keeping children safe in education](#) Part 4: supply teachers, trainee teacher and all contracted staff.

#### **Professional Visitors and Organisations or Individuals using school premises for non-school activities**

When allegations that meet the harm threshold against individuals are made against professional visitors or Organisations or Individuals using school premises for non-school activities ; we will contact the Manager of individual concerned and contact the Local Authority Designated Officer (and if necessary the Police) in accordance with [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#).

When any allegations or concerns that do not meet the harm threshold (for example where an individual has not acted in accordance with our expected standards for [Visitors](#) or agreement of [Use of school premises for non-school activities](#)); we will report concerns to the Line Manager for the Professional Visitor or the Manager of the Organisation using our premises.

Outcomes arising from concerns raised may impact on decisions to allow professional visitors back on the school site or termination of agreements with agreement of [Use of school premises for non-school activities](#)

#### Managing allegations (including low level concerns)

We promote an open and transparent culture in which all concerns about the behaviour or conduct of any adults working in, at or on behalf the school are dealt with appropriately.

There are two levels of allegations / concerns:

### **1. Allegations that may meet the harm threshold.**

Circumstances where a someone working at or for the school has or may have:

- behaved in a way that have harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would 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. This includes any behaviour that may have occurred outside of the school that could pose a transferable risk.

Allegations that someone that working in, at or on behalf the school has met the harm threshold should be immediately referred to the Headteacher in person. Staff may be required to provide a written statement at the request of the Headteacher.

If the allegation relates to the Headteacher; this should be immediately verbally reported to the Chair of Governors.

If there is any conflict of interest or immediate risk of harm to a child or; then the person with the concern must ensure [Immediate safety](#) and contact the Local Authority Designated Officer in accordance with [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#).

In most cases; the Headteacher (or the Chair of Governors if applicable) will lead on managing allegations; with the support of the Human Resources Department and the Designated Safeguarding Lead and in line with the Managing Allegations. They will ensure that Part 4 [Keeping children safe in education](#) and [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#) are applied. Any allegations that meet the above criteria will be referred to the Local Authority Designated Officer within 1 working day and we will follow their advice and guidance.

We will notify OFSTED of any allegations of harm or abuse by anyone working or looking after children at the premises. Will do this irrespective of whether the allegations of harm or abuse are alleged to have been committed on the premises or elsewhere, for example, on a visit. We will notify OFSTED as soon as reasonably practical and within 14 days of the allegation first being made, informing them of action taken by completing the online form - [Report a serious childcare incident - GOV.UK](#)

It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fairly and consistent way to effectively safeguard all those involved.

We also have a duty of care towards our staff, and we will provide a named contact for the staff member.

If necessary, we will adhere to our legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Part 3 [Keeping children safe in education](#) if the criteria for such reporting is met.

### **2. Allegations / concerns that do not meet the harms threshold (Low level concerns).**

The term low level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteer may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Our staff code of conduct outlines examples of what could be considered a low-level concern;
- Does not meet the harm threshold at point 1 above.

Low level concerns should be reported in person to the Headteacher/DSL; to embed our culture of openness and transparency. To ensure that our school's values and expected behaviours are lived, monitored, and reinforced by all staff.

The Headteacher will decide the outcome of all low-level concerns (in consultation with the Designated Safeguarding Lead if necessary) raised in line with low-level concerns, staff code of conduct, disciplinary policies. Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider school culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

### Whistle Blowing

Whistleblowing is the mechanism by which staff can raise concerns about poor or unsafe practice, wrongdoing and/or potential failures in the school's arrangements in good faith without fear of repercussions. All staff have a duty to raise concerns about malpractice or wrongdoing where this is impacting on the safety and welfare of children.

If staff have such concerns; these should be raised to DSL or Headteacher (refer to whistleblowing policy and procedure).

If staff feel unable to raise concerns with the school directly; they can contact

- [NSPCC Whistleblowing Advice Line](#). NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends.
- The email address is: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
- Ofsted provides guidance on how to make complaints about a childcare and education providers: [Complaints procedure - Ofsted - GOV.UK](#)
- General guidance on whistleblowing can be found via: [Whistleblowing for employees: What is a whistleblower - GOV.UK](#)

## **Record Keeping and Information Security**

We have a legal duty to act in line with data protection laws. We have data protection processes in place to ensure that we keep and process (manage) personal information about children, their families; staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with [Meeting digital and technology standards in schools and colleges](#) and [Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK](#) (see also [Online Safety](#))
- Manage requests for access to personal information we hold (known as subject access requests).

Details of our processes and how to request access to personal information we hold are outlined on our website and in our GDPR policy, Privacy notice and Freedom of Information Publication notice. See [Data protection in schools - Guidance ; Information Commissioners Office Guidance for Organisations](#) and/or [Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK](#)

### **Storage and management of safeguarding information (child protection files)**

Safeguarding [concerns](#) and [responses](#) for individual children are kept in a child protection file. Child Protection files are stored individually for each child and are separate to a child's main pupil file. The

Designated Safeguarding Lead is responsible for ensuring the quality, maintenance, and management of child protection files; as well as using the recording system to monitor themes and patterns of concern to inform and continue to improve the whole school approach to safeguarding. Staff record concerns on CPOMS, a secure electronic system. DSLs have enhanced access to CPOMS with 2 factor authentication. Any historic child protection records for children still on roll at our school is kept in a paper-based file or on a secure area, with limited access on the school server, in an individual pupil file that is separate from the pupil file.

The Designated Safeguarding Lead will ensure that child protection files meet the standards set out in Keeping Children Safe in Education Part 2 and Annex B and the Shropshire Transition in Education Guidance (safeguarding children at educational transition points) as well as to enable analysis of information held on the child protection file to inform their response<sup>4</sup> including:

- Ensuring all safeguarding concerns, actions and decisions made and the rationale for those actions/decisions are clearly and factually recorded has been a on the child protection file.( Appendix C: Safeguarding Concern Reporting Form if part of your process and contents of a child protection file in Shropshire Transition in Education Guidance (safeguarding children at educational transition points))
- Ensuring the recording of professional opinion is clearly explained (for example concerns raised due to observations of established signs and indicators, or actions or decisions taken based on evidence-based assessment/tools; such as those outlined and linked in the local Framework for Action)
- Where child protection files contain extensive historical information, ensuring that records are organised so that:
  - Significant/key events that have had an impact on the child can be clearly identified and reviewed (SSCP Chronology guidance)
  - patterns of repeated concerns and/or cumulative harm<sup>5</sup> can be clearly identified.

This will enable the Designated Safeguarding Lead to provide a structured summary of current risk, relevant context and ongoing support needs either:

- as part of Sharing safeguarding information with others when responding to safeguarding concerns (for example referrals to Family Help or Child Protection) and/or
- when carrying out Transfer of child protection files and other safeguarding information to another education provider or for statutory Local Authority education notification processes (such as children missing education or who have become electively home educated).
- Ensuring records are only accessed or shared with those who need to see it in line with data protection laws and Sharing information with others

## Sharing safeguarding information with others

Data protection laws and principles allow us to store, share (and withhold) personal information as follows:

- Safeguarding information contained on the child protection file and any other information we hold for safeguarding purposes is 'special category personal data'.
- 'Safeguarding of children and individuals at risk' is a processing condition that allows us to share safeguarding information without consent where there is a good reason to do so; as further explained below.
- We will not share personal data in circumstances where the 'serious harm test'<sup>6</sup> is met (where sharing would be likely to cause serious harm to the physical or mental health of any individual).

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<sup>4</sup> [Assessments: learning from case reviews | NSPCC Learning](#)

<sup>5</sup> For further guidance see [A Practitioner's Quick Guide to Cumulative Harm](#)

<sup>6</sup> [A guide to the data protection exemptions | ICO](#)

We will seek the advice of our Data Protection Officer and the Information Commissioner's Office when necessary.

We are proactive in sharing information with each other and others who are working with our children and their families as early as possible; so that children can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse, neglect, exploitation and/or harm.

Staff are expected to share information with one another as part of their work in school about the needs and risks of children on a need-to know basis in line with our [Safeguarding Statement](#) so that we keep children safe and promote their welfare. They are not permitted to share information with friends, family, or anyone in the local community outside of their work.

#### Sharing information with other organisations

Staff should be familiar with and use:

- [Information sharing advice for safeguarding practitioners.](#)
- [Sharing personal data with law enforcement authorities | ICO](#)
- Statutory guidance on the Information Sharing Duty will be used once it is published by the Government (which is expected in this academic year).

As part of our [work in partnership](#) with parents and children; consent to share their information with others outside of school should always be sought from a child and their parent(s) unless it is not safe to do so.

This includes where seeking consent would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If a parent or child does not consent to their information being shared, data protection laws allow us to share information without consent for the purpose of keeping a child safe or if there is another legal basis to do so (such as information sharing requirements in statutory guidance). Where this happens, staff will explain to parents and children why the information still needs to be shared, unless it is not safe or possible to do so.

Decisions to share safeguarding information with other organisations (including [Transfer of child protection files and other safeguarding information](#)) will be overseen by either the Designated Safeguarding Lead (please also refer to [Designated Safeguarding Lead Response](#)) and/or (and always in the case of [Ensuring safe staff](#)) the Headteacher.

When deciding what information to share, consideration will be given to:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving organisation to know, and
- whether it is clearly presented and appropriately contextualised (see [Storage and management of safeguarding information \(child protection files\)](#)).

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk.

#### Transfer (including receipt) of child protection files and other safeguarding information

The Designated Safeguarding Lead is responsible for ensuring that safeguarding information is transferred, reviewed and actioned promptly at all transition points in a child's educational journey; including in-year moves. They will use the [Shropshire Transition in Education Guidance \(safeguarding children at educational transition points\)](#) to guide their practice approach.

When a child leaves for a new education setting (including in-year moves); the Designated Safeguarding Lead will arrange for the child protection file (and any additional information to help the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting no later than within 5 working days of an in-term transfer or within 5 days from the start of the new term.

Where the move is planned; the Designated Safeguarding Lead will consider sharing information (which could include a conversation with the Designated Safeguarding Lead in the new provision) in advance of the child leaving to help with the child's transition and to enable any help, support or protection they may need; and/or where it would support assessment of risk to others in the school (for example where the child's behaviour causes safeguarding concern). Safeguarding information should be used to support, not disadvantage, the child.

Child protection files and any other safeguarding information is shared separately to the child's main file and by secure means. Confirmation of receipt of the files should be gained (*refer to Appendix C: File Transfer Record and Receipt*).

The file transfer will include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs. File transfers for Children potentially at greater risk of harm and/or whose files contain extensive historical information will include an Enhanced Transition Summary Form

If a child is absent from education or Electively Home Educated; we share relevant information with the Local Authority as required by law (please see Children potentially at greater risk of harm). If the child leaves our setting and does not move to a new education setting; we transfer their child protection file (and any additional information as necessary) to the relevant Local Authority that they reside in line with the local protocol.

The Designated Safeguarding Lead will be notified of all children due to start at the school prior to or (in exceptional circumstances) on the date they start. The Designated Safeguarding Lead will be promptly notified of and review any safeguarding information shared to ensure they:

- Understand key risks and needs, relevant context and any ongoing support needs for the child.

Where information indicates a risk to others and/or the individual child (for example if a child's behaviour causes safeguarding concern) the Designated Safeguarding Lead will work closely with the School Behaviour/Inclusion Lead and other relevant Senior Leaders to respond and assess the risk to both the individual pupil and others in the school; to put in place a safety and support plan in place.

- Identify any unclear, incomplete or missing information and seek clarification from the sending provider to ensure effective safeguarding.

If the child protection file has not been received as required by Keeping Children Safe in Education Part 2 and Annex B; then the Designated Safeguarding Lead will use the SSCP Escalation/Resolution Of Disagreements Policy (or applicable Child Safeguarding Partnership Escalation Policy for the Local Authority area that the sending provider is based).

- Share safeguarding information as required with key staff including Deputy Designated Safeguarding Leads, SENCOs or other staff who need to know. See also Children potentially at greater risk of harm.

## Working in Partnership

As is outlined in our Safeguarding Statement; and to ensure all children in our school are effectively safeguarded and their welfare is promoted; we will work in partnership with our children, their parents and other agencies/partnerships as follows:

## Children

Our children are [taught how to keep safe](#); including how and when to share or report to us any worries or concerns they may have about their safety and wellbeing or that of others. We encourage children to share and report worries and concerns by:

- Speaking to any member of staff no matter who they are
- Regularly reinforcing messages of speaking out to stay safe
- Promoting external agencies such as ChildLine, Kooth, as people to talk to.
- Where appropriate, worry boxes and circle time
- Pod drop ins during breaktimes
- Prioritising trusted relationships to enable a safe environment for children to share their concerns.

Staff are expected to build trusted relationships with and work in the best interests of children in line with our [Safeguarding Statement](#); and recognise, respond and report [Staff Safeguarding Concerns](#).

We also actively seek children's views of safety in school through our house system, play assemblies and pupil questionnaires.

## Parents/Carers

We recognise the importance of working together with and supporting parents to safeguard and promote the welfare of their children.<sup>7</sup> This includes:

welfare of their children. This includes:

- Communicating to parents how we keep children safe in our school (including online). This policy is made available to all parents on our school website. If parents want to raise concerns or complaints about how we keep their children safe; they can do this using our Complaints Policy which is available on our website. We also actively seek parent views of safety in school through parent questionnaires. Encouraging parents to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. We do this by making key members of the visible at the start and end of the school day, having clear lines of communication for parents to contact staff and by ensuring contact details of the DSL are available. Staff are expected to respond to any parents who raises worries or concerns to them either about their child(ren) or others in line with [Staff Safeguarding Concerns: Recognise, Respond, Report](#).
- Meeting with parents prior to children starting to request information relating to the child's routines, likes and dislikes, special dietary requirements, intolerances/ allergies and allergy action plans and requesting parents inform us of any changes to these throughout the year.
- The Designated Safeguarding Lead will ensure that we work with parents to offer and enable support for children and their families; taking action to safeguard and promote their welfare (see [Designated Safeguarding Lead Response](#)) in line with the local arrangements in the area that they live.
- Ensuring that parents are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority and/or Enforcement Agencies. We do this by listing contact details on specific pages on our school website.
- Providing parents with regular information, guidance and external support available to them by newsletters; dedicated pages on our website; running sessions for parents; signposting via social media pages, providing information to parents in induction packs.

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<sup>7</sup> Outlined in [Working Together to Safeguard Children](#) Chapter 1: Principles for working with parents and carers

## Other agencies/partnerships

As we operate in Shropshire; we engage and co-operate with our local safeguarding arrangements. Our local safeguarding partnership is [the Shropshire Safeguarding Community Partnership \(SSCP\)](#). We engage and co-operate by:

- Ensuring we effectively safeguard and promote the welfare of children living in Shropshire in line with [Working together to safeguard children](#) and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the [SSCP Framework for Action](#). Where children do not live in Shropshire but attend our school; we will work in line with the relevant local arrangements in their home area.
- Ensuring we work with other agencies and comply with other pieces of relevant statutory guidance in safeguarding [Children potentially at greater risk of harm](#).
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
- Working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure we are providing high quality education and support to children in Shropshire.
- Participating in the local Operation Encompass arrangements; an arrangement where police have a legal duty to notify schools if they have reasonable grounds to believe a child attending the school may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently. This enables us to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of our participation in Operation Encompass

## Teaching our children how to keep safe.

We recognise that educating our children in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. We have a clear set of values and standards that provide opportunities for children to learn how to keep themselves and others safe; that are demonstrated and reinforced throughout school life and underpinned through -

- [Safeguarding Statement](#)
- Behaviour/Anti-Bullying Policy
- [Preventing Radicalisation](#)
- Our approach to [Online Safety](#)
- Our Personal Social Health and Education and Computing curriculum and policies including our RSHE Policy. Our RSHE programme is compliant with [Relationships and sex education \(RSE\) and health education - GOV.UK](#). It is developed to be fully inclusive of all ages and stages of development and consideration of children's needs including [Children potentially at greater risk of harm](#); and addresses issues as outlined in [Keeping children safe in education](#) Part 2: Opportunities to teach safeguarding.

The DSL and other key members of the Senior Leadership Team will work closely with the RHE/RSHE lead and other key curriculum leads (including Computing Leads) to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in school.

## Online Safety

The use of information and communication technology (ICT); is a vital part of the everyday functioning of and life in school. We also recognise the important role ICT plays in the lives of our children and their families.

Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in school when using internet enabled technology; as outlined in the following categories:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images including those generated using AI and online bullying,
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We adopt a whole school approach to online safety which aims to safeguard and educate our children and their families, staff, visitors and our school in our use and management of ICT (including the use of Artificial Intelligence, camera enabled mobile and personal devices and the ICT systems we have in place). Our online safety policy, taking into consideration the guidance: [Safeguarding children and protecting professionals in early years settings: online safety considerations - GOV.UK \(www.gov.uk\)](#) and [Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK](#), outlines our approach. This is available on our school website.

Our Online Safety Policy outlines our approach as to how technology is used, by who and when including:

- The use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities
- Filtering and monitoring systems which are in line with digital and technology standards for Filtering and monitoring and include:
  - Identification and assignment of roles and responsibility to manage filtering and monitoring systems.
  - Reviewing filtering and monitoring provision at least annually
  - Blocking harmful and inappropriate content without unreasonably impacting teaching and learning
  - Ensuring effective monitoring strategies in place that meet our safeguarding needs.
- Reference to our Cyber security arrangements that ensure information security (see also Record Keeping and Information Security), reduce the risk of disruption and mitigate safeguarding risks. These are in line with digital and technology standards for Cyber Security and take account of Schools | National Cyber Security Centre and Early Years practitioners: using cyber security to protect your settings | National Cyber Security Centre Image guidance for education settings - UK Safer Internet Centre

Any school cyber security incidents will be reported to Action Fraud (National Fraud and Cyber Crime Reporting Centre) and, if there is a data breach this will be reported in line with our Data Protection Processes to the Information Commissioners Office.

- The use of Generative Artificial Intelligence (AI). We use Generative AI in line with Generative AI: product safety standards and ensure we understand and help our children to understand the safe use of Generative AI.
- The use of screens with early years children. We follow Help for early years providers : Screen use
- Ensuring children are taught how to use technology (including Generative AI) safely. As further outlined in Teaching our children how to keep safe.
- Where children are being asked to learn online at home, we follow advice from the Department of Education; Safeguarding and remote education. Our approach to remote learning is outlined in our Remote Learning Policy
- All Staff, senior leaders and members of the Governing Body are appropriately trained (see Professional Development and Supervision) to enable them to ensure effective online safety arrangements. We will respond to online safety incidents which indicate safeguarding concerns in

line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#) sections of this policy.

## Reviewing online safety

We review our online safety arrangements at least annually to ensure that we meet the online safety standards outlined in [Keeping children safe in education](#) and [Early years foundation stage \(EYFS\) statutory framework - GOV.UK](#)

Including ensuring adherence to:

- digital and technology standards for [Filtering and monitoring](#) and [Cyber Security](#)
- [Generative AI: product safety standards](#)
- [Safeguarding children and protecting professionals in early years settings: online safety considerations - GOV.UK](#)
- [Early Years practitioners: using cyber security to protect your settings | National Cyber Security Centre](#)
- [Help for early years providers : Screen use](#)

We record the outcomes of our reviews including any risks. Risks and actions arising are added to our school evaluation and improvement action planning processes and reported to and overseen by our Governing Body.

## Preventing Radicalisation

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015; places a duty on schools and registered childcare providers to have due regard to the need to prevent people from being radicalised into terrorism.

We have a Preventing Terrorism policy in which outlines how we fulfil this duty. This includes:

- Promoting fundamental British Values as part of our values and curriculum (refer to relevant policies).
- Ensure that we provide a “safe space” for children to understand and discuss sensitive topics, those linked to radicalisation and terrorism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.
- Be alert to and identify children who may be [susceptible to radicalisation into terrorism](#) and where it is assessed as appropriate by the [Designated Safeguarding Lead](#); make a Prevent referral (in line with the local [Preventing Terrorism Processes](#))
- Monitor and report any hate based behaviour as part of our Behaviour and Child-on-Child Abuse Policies (Hate related incident reporting processes can be found [here](#)).
- Outline in our Online Safety and Relationship Sex Health Education Policies (include any other curriculum subjects related policies) how children are being safeguarded from being drawn into terrorism. (please also refer to [Teaching our children how to keep safe](#))
- Ensure that hosting external speakers or visitors that attend our school premises are suitable and appropriately supervised (please also refer to [Visitors](#))
- Assess the risk of our children being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are referenced in our school evaluation processes; and inform our approach to online safety (including filtering and monitoring and cyber security arrangements).

We regularly review our adherence to the Prevent Duty. Any actions arising from our assessment are included in our school evaluation and improvement action planning processes. These are reported to and overseen by our Governing Body.

All Staff, senior leaders and Governors are appropriately trained (see [Professional Development and Supervision](#)) to enable them to ensure that all children, particularly those who may be susceptible to radicalisation are effectively safeguarded. We respond to children who are identified as being susceptible to radicalisation in line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#) sections of this policy.

## **Children potentially at greater risk of harm**

We recognise that whilst all children should be protected, some groups of children are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a child falls into multiple groups above; this potentially further increases their vulnerability.

### **Children who need Local Authority social care (Child in Need and Child Protection).**

If a child needs Local Authority social care, as a child in need or because of child protection concerns, they are more vulnerable to harm/further harm and may face barriers to attendance, learning, behaviour and mental health.

The Designated Safeguarding Lead will be informed (if they are not already aware/have referred a child) when a child needs Local Authority Social Care. They will be a part of the core group of agencies (known as the core group) to so that decisions can be made in the best interests of the child's safety, including ensuring that the child's educational outcomes are promoted.

We ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements to ensure that they are aware of their greater level of vulnerability and ensure their educational outcomes are promoted.

### **Looked After Children and previously looked after children (including care leavers).**

The most common reason for children becoming looked after is because of abuse and/or neglect; as well as/or other significant complexities or adversity in their and their family's life. They are more vulnerable to harm/further harm and may face barriers to attendance, learning, behaviour and mental health.

We ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements to ensure that they are aware of their greater level of vulnerability and ensure their educational outcomes are promoted. We have an appointed Designated teacher. They work closely with the DSL and the local authority; including the allocated social worker or Personal Advisor; as well as the Virtual School to promote the educational achievement of registered pupils who are/have been looked after in line with [Statutory guidance - Designated teacher for looked-after and previously looked-after children](#); and where required [respond](#) to safeguarding concerns.

### **Children who are absent from or are not in receipt of full-time education**

Education is essential for children's progress, wellbeing and wider development and being in school is a protective factor against wider harms, including exploitation.

Children being absent from education including those accessing early years provision for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect or child exploitation; as well as other needs.<sup>8</sup>

All children aged 5-16 are legally entitled to a full-time education, suitable to any [special education](#) and/or [medical need](#).

Our response to children who are absent from or not in receipt of full-time education (in the case of school aged children); ensures that we are proactive in safeguarding children and identify indicators of abuse, as well help to prevent the child missing education in the future.

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<sup>8</sup> See also [Safeguarding children not in school](#) | [Child Safeguarding Practice Review Panel](#)

We hold more than 1 (and in the case of early years children; 2) emergency contacts per child and follow up all unexplained absence in a timely manner. Any response to absence (including absence within the school day) will be considered in the context of any need or concern that we are already aware of for the child or their family. This may include the use of home visits.

Any patterns of or prolonged, persistent or severe absence will result in us working with the Education Access Service: Attendance (in the case of school aged children); and in the case of Looked After Children and previously looked after children; the Virtual School. Such absence will also be considered as a safeguarding concern and recorded as such. In these circumstances, the Designated Safeguarding Lead will work closely with the School Attendance Lead and other relevant Senior Leaders as part of their response.

Further details as to our response to children who are absent from or not in receipt of full-time education; including where this is due to special education and/or medical needs (in the case of school aged children) are outlined in the following policies, which are made available to parents (see also Working in Partnership):

- Attendance Policy
- Supporting pupils with medical conditions policy (see also Safeguarding children with medical conditions)

### **Children who are Electively Home Educated.**

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best interests at the heart of the decision. However, this is not the case for all, and home education can mean some children are not in receipt of suitable education and less visible to the services that are there to keep them safe and supported in line with their needs.<sup>9</sup> When a parent/carer expresses an intention to electively home educate their child we will follow local Elective Home Education process and policy and DfE Elective home education guidance.

Where parents need local authority consent to home educate their child and/or elective home education may not be in the child's best interests and/or increase their risk of abuse, neglect, exploitation or harm, this will be treated and recorded as a safeguarding concern.

In these circumstances the Designated Safeguarding Lead will work closely with the Headteacher, the SENCO (if the child has special educational needs) and Education Access Service to review the decision to ensure the parents/carers have considered what is in the best interests of each child.

### **Children whose behaviour causes concern**

It is important that children in our school know and understand how we expect them to behave. This includes teaching them how to behave in a safe and healthy way within, outside and after school; and ensuring that our school is a safe place where all children feel safe and able to learn.

Our Behaviour Policy outlines the expected standards of behaviour for our children; as well as the systems we have in place to create a safe school environment including:

- The Use of reasonable force ,
- Searching, screening and confiscation,
- The use of Mobile phones in schools
- Preventing all forms of bullying and our approach to preventing and responding to child abuse, which is also outlined at Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures
- Use of/referral to local education inclusion arrangements and/or hate relating incident reporting processes).

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<sup>9</sup> See also [Safeguarding children not in school](#) | [Child Safeguarding Practice Review Panel](#)

It further outlines how the school will support and respond to children with additional needs (including those with Special Educational Needs and Disabilities or other Children potentially at greater risk of harm); and children who are suspended or at risk of permanent exclusion.

Behaviour that causes concern can be a sign or indicator that a child has an unmet need or could indicate that they are at risk of or are experiencing/have experienced abuse, neglect, exploitation, harm or some other form of adverse experience<sup>10</sup> in their life. Staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report where a child's behaviour also indicates a safeguarding concern; including being alert to behaviour that causes concern outside of school (including online). This policy and procedures will be followed when there are concerns that a child:

- Is showing early signs of abusive, violent and/or harmful behaviours. These behaviours may be physical, sexual or emotional and could be directed towards children or adults (including staff). It could also include where a child expresses intent to cause serious harm or kill others. Where behaviour is directed towards other children, Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures apply.
- Is regularly/repeatedly receiving sanctions; including being repeatedly removed from the classroom, experiencing multiple suspensions, and/or is at risk of being permanently excluded.
- Is carrying or using a weapon (or expressing intent to do so)
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is at risk of being radicalised into terrorism (see also Preventing Radicalisation)
- Is frequently missing/goes missing from education (including during school time), home or care
- Has signs of self-harm, suicidal ideation/risk of suicide (see also Children requiring Mental Health Support)
- Is misusing alcohol or other drugs

As part of the Designated Safeguarding Lead Response, the Designated Safeguarding Lead will work closely with the School Behaviour/Inclusion Lead and other relevant Senior Leaders to assess the risk to both the individual pupil and others in the school; to put in place a safety and support plan. If applicable, they will follow:

- Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures and/or
- Keeping Children Safe in Education: Part 1 & Annex A: Serious Violence (including where there are concerns about the child carrying or using a weapon; or expressing intent to do so) and/or
- Local hate related incident reporting processes.

## **Safeguarding children with medical conditions**

We recognise the importance of ensuring early support for children with medical conditions to ensure that their welfare is promoted and they are effectively safeguarded.

We support children with medical conditions, including allergies and mental health needs through clear school arrangements that promote their health, safety and inclusion. Relevant information is obtained from parents and carers, recorded accurately, shared with appropriate staff on a need-to-know basis, and reviewed when needs change. Staff follow agreed procedures and relevant staff complete appropriate training for:

- managing allergies and dietary requirements, including ensuring safer eating,
- maintaining first aid arrangements and responding to medical incidents
- administering medicines (where necessary),

Where appropriate and proportionate individual health care plans and children's education is adapted (see also Children who are absent from or are not in receipt of full-time education) to ensure we effectively

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<sup>10</sup> See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

support children with medical conditions. This may also be in place alongside support provided as part of a child's special education need or disability.

Further details as to our procedures for children with medical conditions are outlined in:

- Supporting pupils with medical conditions policy that is in line with Supporting pupils with medical conditions at school - GOV.UK, and the local Inclusion Pathway (includes Section 19) and Early years foundation stage (EYFS) statutory framework - GOV.UK
- Allergy Safety Policy that is in line with Allergy safety in schools - GOV.UK

Where there are concerns that a child's medical needs are not being effectively managed or responded or indicates risk of suffering abuse, neglect, exploitation and/or harm (whether from parents/carers or other people outside of their family including staff); staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report and (in the case of staff Ensuring safe staff). The Designated Safeguarding Lead Response will work closely with relevant senior leaders to Work in Partnership and in line with the Framework for Action to ensure that the child is effectively safeguarded. Where applicable safeguarding arrangements for Children who attend Alternative Provision will also apply.

### Children requiring Mental Health Support

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation and/or harm. Children who have mental health needs may need additional support to avoid their safety and welfare being compromised. **Only** appropriately trained professionals should attempt to make a diagnosis of mental health problem. However, we understand that we have an important role to play in:

- promoting good mental wellbeing and preventing the onset of mental illness; including Teaching our children how to keep safe.
- observing children and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

For most children who require mental health support; we will follow our procedures for children with medical conditions. If there are concerns that a child may be experiencing or at risk of developing mental health problems that place them at risk of harm (for example concerns about self-harm, suicidal ideation or risk of suicide, eating disorders etc); then staff will adhere to Staff Safeguarding Concerns: Recognise, Respond, Report.

As part of the Designated Safeguarding Lead Response, the Designated Safeguarding Lead will work closely with the Senior Mental Health Lead to promote and if necessary, enable children to access support from local mental health support and services. Where there are concerns about self-harm; suicidal ideation or risk of suicide; local pathways and resources will be used.

At St Thomas and St Anne's CE Primary School we have an ELSA and a learning mentor who have a specific designated time to work with pupils identified to require additional support. Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK ([www.gov.uk](http://www.gov.uk))

### Children with Special Education Needs Disabilities or other health issues.

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions (see also Safeguarding children with medical conditions) can face additional safeguarding challenges both online and offline.

We recognise and ensure our staff are trained to be aware that additional barriers can exist when recognising abuse, neglect, exploitation and/or harm in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration,
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children,
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs,
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,
- the need for intimate care or that these children are isolated from others,
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Where safeguarding concerns are raised for a child who has SEND, the Designated Safeguarding Lead will work closely with the SENCO. Where applicable safeguarding arrangements for Children who attend Alternative Provision will also be followed.

St Thomas and St Anne's CE primary school provides extra pastoral support and attention for these children; [SEND code of practice](#) and [The SEND local offer | Shropshire Council](#) and [Education for children with health needs who cannot attend school -](#).

### **Children who attend Alternative Provision**

Children placed in Alternative Provision (AP) often have complex needs and may be more vulnerable to harm. When a school commissions AP, it retains responsibility for the child's safety and welfare and must ensure the provider can meet the child's needs.

We ensure safeguarding arrangements at any Alternative Provision (whether school or non-school) that we commission are effective and compliant with:

- Keeping children safe in education (Part 2)
- Alternative Provision.
- Non-school alternative provision: voluntary national standards.

We refer to and follow the Local Alternative Provision processes; seeking guidance from the Education Access Service (Attendance/Inclusion Teams) | Shropshire Learning Gateway when needed.

If safeguarding concerns arise for any child that we place in alternative provision; we ensure that there are robust procedures are in place between ourselves and the alternative provider including:

- Staff in the alternative provision report concerns to their DSL.
- The DSL for the alternative provision will share and discuss the concern with the commissioning school's DSL to agree the Designated Safeguarding Lead Response
- The DSL for the commissioning school will ensure that they share any relevant safeguarding concerns and if necessary, include the DSL for the alternative provision in the Designated Safeguarding Lead Response.
- Both the commissioning school and the alternative provider will maintain their own child protection file for the child in line with requirements in Keeping Children Safe in Education (Part 2 and Annex A) and Record Keeping and Information Security. The alternative provider will ensure regular transfer/sharing of the child protection file throughout the commissioning period as well as when the placement comes to an end.

## Young Carers<sup>11</sup>

Young carers are children who have everyday caring responsibilities for a family member. Children and/or their family may not share that they have such caring responsibilities. The care and support a young carer provides for their family is incredibly important; but the additional responsibility this places on a child can also impact their attendance, attainment, behaviour and wellbeing.

We expect our staff to be alert to the signs that a child might be a young carer. Signs might include noticing that a child<sup>12</sup>:

- Seems anxious about being away from home
- Is often tired or distracted
- Finds it difficult to fully engage with their education. For example, has irregular attendance (including absence/lateness); not completing homework; unable to take part in after school activities.
- They are carrying out responsibilities beyond what's typical for their age or level of development
- Worries about a parent/carer or sibling's wellbeing
- Withdraws socially or avoids making plans

Where there are concerns that a child is a young carer who may need extra help and support; staff are expected to follow Staff Safeguarding Concerns: Recognise, Respond, Report. As part of the Designated Safeguarding Lead Response; the DSL will consider enabling the child and family to access local support for Young carers.

## Children under 5, particularly babies and those not yet born

Children under 5 years of age are particularly vulnerable to abuse and neglect<sup>13</sup>. Babies (under the age of 1 including those not yet born) are more vulnerable to experiencing serious harm in certain circumstances.<sup>14</sup>

Whilst we don't care for children under 3 including babies under the age of 1, we do often work with families who are pregnant or who have children in this group.

As part of our nursery provision, we care for children under 5 and follow the Early Years Foundations Stage Statutory Framework.

We consider the safety and welfare of every child within a family; even if they do not attend our school/setting (see Safeguarding all children and Working in Partnership). As such, we ensure that we are alert to families who are pregnant and/or have children under the age of 5, including paying attention to any indications that children in this group may be at risk.

Where concerns about children in this group arise; staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report. As part of their response, Designated Safeguarding Leads will ensure they refer to specific regional procedures as applicable including:

- Pre-Birth
- Bruising in Babies and Children

## Children who are Black, Asian, Mixed Heritage or from other minoritised ethnic communities.

Children who are Black, Asian, Mixed heritage or from other minoritised ethnic communities (including Gypsy Roma and Travelling communities) are more likely to experience racism, bias, stereotyping or

<sup>11</sup> For further information, please see: [Young carers | Shropshire Council](#)

<sup>12</sup> ['Who Am I? Young carers poem and animation](#)

<sup>13</sup> [Early years safeguarding and child protection | NSPCC Learning](#)

<sup>14</sup> [Vulnerable babies | Child Safeguarding Practice Review Panel](#)

cultural misunderstanding. We recognise that additional barriers can exist when recognising and responding to abuse, neglect, exploitation and/or harm for children in these groups.<sup>15</sup>

We will act in line with our Safeguarding Statement; as well as being aware of when bias (conscious or unconscious) may affect how we work with children and their families in this group. For example,

- Care should be taken to ensure children in these groups are not treated as older, more mature or resilient than they are (known as adultification).
- Working in partnership to understand how a child's culture and identity shapes what daily life looks and feels like for them.

We will also, where appropriate use, and follow hate relating incident reporting processes.

### **Children who are lesbian, gay or bisexual**

The fact that a child or a young person may be lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, children in these groups can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual can be just as vulnerable as children who are.

Our School Behaviour Policy and Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures further outlines how we prevent and respond to bullying and other forms of child-on-child abusive behaviour. We will also, where appropriate use, and follow hate relating incident reporting processes.

### **Children who are questioning their gender**

In recent years, there has been an increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. It is common for children to engage in activities that are less typically associated with their sex. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

We will not initiate any action to make changes or put support in place to facilitate a child presenting as the opposite biological sex (known as "social transition") unless a child's parent or carers have been involved in the decision (except when involving them would increase risk to the child).

Keeping Children Safe in Education (part 2), including if a Designated Safeguarding Lead Response is required will be followed relating to:

- Sport
- Regulations and safeguarding requirements relating to school premises
- Boarding and residential accommodation (including educational visits)
- Children who are questioning their gender.

Staff are expected to Report the following to the Designated Safeguarding Lead:

- a child requests changes or support for social transition **and** their parent or carer is not aware or already involved in the decision.
- a child has confided in a staff member, or it is known that they are questioning their gender **but** have not made a request for changes **and** the staff member has concerns for the child's safety or wellbeing (if there are no safeguarding concerns, there is no reason to report to the DSL)
- a parent or carer requests changes or support for social transition **and** there are concerns for the child's safety or wellbeing.

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<sup>15</sup> See [Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning](#) and [Black, Asian and Mixed Heritage children | Child Safeguarding Practice Review Panel](#)

Children who are questioning their gender can sometimes be targeted by other children. In some cases, a child who is perceived by other children or adults to be engaging or behaving in ways that are less typically associated with their sex can be just as vulnerable.

Our School Behaviour Policy and Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures further outlines how we prevent and respond to bullying and other forms of child-on-child abusive behaviour. We will also, where appropriate use, and follow hate relating incident reporting processes.

## Child-on-Child Abuse (including harassment and violence)

As set out in our Safeguarding Statement; we will not tolerate the abuse of children. This includes where children abuse other children (child-on-child abuse; including harassment and violence) or words or actions are used which downplay or could (if not responded to) lead to such abuse<sup>16</sup>, as this can lead to a culture of unacceptable behaviour and an unsafe environment for children. In worst case scenarios this can create a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

We want to ensure that no child from our school experiences child-on-child abuse (including harassment and violence). However, we understand the scale of child-on-child abuse (including harassment and violence) and that we cannot just rely on children telling us child-on-child abuse is happening. Even if there are no reports in school, this does not mean child-on-child abuse (including harassment and violence) is not happening, but it is just not being reported.

Staff will be made aware of the signs and indicators of child-on-child abuse (including harassment and violence) as part of their Professional Development and Supervision; which do not just rely upon children telling someone. Staff are expected to follow our Appendix B: Child-on-Child Abuse Procedures

The school monitors patterns of child-on-child incidents including those involving abuse, to ensure that we are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps us to continue to prevent, identify and respond to child-on-child abuse (including harassment and violence) as outlined at the beginning of this section. This monitoring and our responses to it are reported to and overseen by our Governing Body.

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<sup>16</sup> Words or actions which downplay include describing or accepting “banter”, “just having a laugh”, “part of growing up” or “boys being boys”.

# Staff Safeguarding Concerns: Recognise, Respond, Report

## Recognise

### Be alert and curious!

Pay attention to possible **signs or indicators** of abuse/harm to the child from the child themselves or others either from your own observation or what the child/others tell you:

Appearance

Behaviour

Communication.

**Do not just rely on a child telling you** (there are lots of reasons why they won't)

Any child in any family could become a victim of [abuse](#), neglect, exploitation and/or harm. Abuse and safeguarding issues are complex; and can often involve a child experiencing overlapping issues or types of abuse.

Staff should always maintain the attitude that abuse “could happen here”. Staff should be particularly alert to [Children potentially at greater risk of harm](#) and vigilant in identifying the signs and indicators which could indicate a concern that a child is being or could be at risk of abuse/harm.

As well as maintaining their [Professional development and accessing support](#); staff can remind themselves of the signs and indicators of abuse/harm and safeguarding issues by referring to: [Keeping Children Safe in Education](#); Part 1 and Annex A and [SSCP - Contacts and Definitions](#).

**Signs and indicators** of concern may be evident in spaces and places where children spend time (including when online). They may be present in the child or others around them (including adults or children); in their:

- Appearance
- Behaviour
- Communication

Signs and indicators can be recognised by staff through:

**Concerns shared directly by a child:** Staff *must not rely* on children telling them they are experiencing abuse, neglect, exploitation and/or harm. Children may not recognise; feel ready; know how to or be able to communicate concerns or worries. Staff must therefore act in accordance with our [Safeguarding Statement; work in partnership](#) and use professional curiosity and skills in developing trusted and supportive relationships in their everyday work with children.

**Observations:** In person or online (including online behaviour in school) of a child or someone else (for example a parent, someone working or visiting the school).

**Concerns shared by others:** either verbally or in written communications. This could be parents; other children; other staff members or other adults who may be working in or with the school or individual children.

**Other systems we have in place:** For example online through filtering and monitoring arrangements, or information from other agencies through [working in partnership](#) etc.

There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse/harm. Signs and indicators could be present for a variety of reasons as well as abuse (for example other family circumstances; health or learning needs); and

may act as an early sign for the need for additional support (in line with the [Framework for Action](#)). In such circumstances; staff are still expected to respond in line with this policy.

## Respond

Ensure the immediate safety of the child potentially at risk. If there is **immediate danger**; take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and [refer child protection concerns](#))

Apply other relevant policies/procedures (e.g. behaviour; first aid; attendance, staff code of conduct and/or [Appendix B: Child-on-Child Abuse \(including harassment and violence\) Procedures](#) as applicable).

Seek views/gather relevant information (if safe to do so).

**Remember:** Listen (don't investigate), reassure (don't promise) and explain you will be reporting the concerns.

### Immediate safety

If a child is in **immediate danger**; staff must take individual action as necessary to keep the child, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves (follow [Do you think a child is being harmed or is at risk? | Shropshire Council](#))
- Work in line with our Behaviour Policy and [Use of reasonable force in schools](#) and/or [Searching, screening and confiscation in schools](#) guidance.
- Report any allegations of harm by adults in a position of trust or unsafe practices in school in line with the [Ensuring safe staff](#).

### Other relevant policies/processes

Staff may need to follow other school safeguarding policies/processes (see [Linked Policies](#)) as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the child and any other children who may be at risk or involved; ensuring they act in their best interests. Where there are concerns of child-on-child abuse (including harassment and violence); [Appendix B: Child-on-Child Abuse Procedures \(including harassment and violence\)](#) should be referred to.

### Injuries

We request parents notify us of any accidents or injuries to their child before attending school. We will make a written record of the notification along with any injuries the child may have. Should a child receive any injuries during school time; staff will follow our accident reporting and first aid procedures.

### Seek views and gather information from the child and others.

Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:

- Children (where appropriate and depending on the circumstances and their role with children);
- any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see [Record Keeping and Information Security](#))
- Their parents (if necessary and depending on the circumstances and their role).

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead.

Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will

be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to [When concerns are directly shared by a child](#).

Views should always be sought unless it is not safe to do so. This includes where seeking views would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If needs for help and support are identified; parents and children should always be asked for their consent to share information with other organisations so that help and support can be provided to them. If consent is not given; staff should follow guidance in the [Recording Keeping and Information Security: Sharing safeguarding information with others](#) section.

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead. Decisions to share safeguarding concerns with other organisations without consent will be [reported to](#) and overseen by the Designated Safeguarding Lead.

If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through their behaviour and use communication tools to help the child share their views. In our setting staff utilise the following methods of communication: Emotional Literacy Support Assistants; Makaton, Lego, My life booklets and widget resources.

#### When concerns are directly shared by a child

Children are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.

When children share the details of or feelings about abuse/harm; the process of sharing can sometimes take time. Children may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly; but the child may share in their Appearance, Behaviour or other forms of communication (see [Recognise](#) section).

It takes a lot of courage for a child to share that they feel unsafe or are experiencing abuse, neglect, exploitation and/or harm. There are many reasons why children do not share their experiences (for example, uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding or ability to recognise and explain their experience).

When children are sharing their concerns; staff should:

- **Listen to the child.** Please refer to this [NSPCC poster](#).
- **Remain calm:** the child may stop sharing if they feel the staff member is upset or shocked by what the child is telling them.
- **Explain it can't be a secret.** Staff must explain to the child that what they share has to be passed on and to who so that you can help them. Think about when to do this to make sure the child feels safe and can continue to trust you and other staff.
- **Reassure** and offer comfort to the child (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.
- **Seek the child's views:** use questions or communication tools that help the child to share from their own point of view. Gather information: do not investigate or assume what is happening to the child.
- **Explain** what will happen next. If you don't know everything that is going to be done, tell the child that you will make sure that they are kept informed.
- **Report and record** the conversation immediately as outlined in the [Reporting concerns](#) section.

- **Seek support** if you feel distressed from: the Headteacher, SLT, Shropshire Council's Counselling service NOSS and support is also available through our partnership with the School's Wellbeing package.
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## Report

**Report in person** to the Designated Safeguarding Lead as soon as possible.

**Record** your concerns, decisions, actions and outcomes on the safeguarding recording system.

**If concerned about a member of staff or someone else in the school;** report in line with [Ensuring safe staff](#).

### Report to Designated Safeguarding Lead

All safeguarding concerns must be Reported to the Designated Safeguarding Lead as soon as they are recognised and after the initial response to the child and others. Staff are expected to verbally report their concerns to the Designated Safeguarding Lead.

Where concerns involve an allegation of harm or a low-level concern about someone working in or at the school; staff must follow [Ensuring safe staff](#).

### Record concerns

All safeguarding concerns must be recorded by the staff member in writing. All staff should record their concerns in writing on CPOMS. All teaching staff have a unique login to be able to record their concerns. For any member of staff/governor/visitor that does not have access to CPOMS they should record their concerns using [Appendix C: Safeguarding Concern Reporting Form](#). Where physical injuries to a child form part of the evidence of the concern; staff will record information about the physical injuries observed on a Body Map. (Body Maps are available in CPOMS or the Child Protection Body Map in the West midlands Physical Abuse Procedures).

Each safeguarding concern record should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- any action taken or decisions reached with an explanation as to why the action/decision was taken and the outcome.

If staff are unsure of the recording requirements staff should seek advice from the Designated Safeguarding Lead.

## Designated Safeguarding Lead Response

Safeguarding concerns can be [raised by staff](#) as above; but may also be raised to the Designated Safeguarding Lead by:

- Children, parents, or visitors to the school.
- Other agencies (see [Working in Partnership](#))
- The school's ICT filtering and monitoring systems
- Colleagues in other settings

The Designated Safeguarding Lead will:

## Consider and assess the concern.

Review the information reported; gather any further information as necessary; including conducting a risk and needs assessment if necessary. The Designated Safeguarding Lead will use and refer to the following:

- [Working Together to Safeguard Children](#) (particularly Chapters 1 and 3)
- [Keeping children safe in education](#)
- [SSCP Framework for Action](#)
- Other [relevant local tools and pathways](#) (West Midlands Procedures)
- If applicable [Appendix B: Child-on-Child Abuse](#) (including harassment and violence) [Procedures](#)
- If applicable [Understanding and identifying radicalisation risk in your education setting](#)
- [When to call the Police - information for schools](#)
- Any other local school safeguarding procedures e.g. Brook Traffic light tool, EHM Liquid Logic.

## Decide on what action to take.

Once the concern has been considered and assessed; the Designated Safeguarding Lead will decide on action(s) to be taken. They may wish to delegate actions to other members of staff; in the best interests of the child. The DSL will assist the Headteacher with decisions to [Ensuring safe staff](#) in school.

In making decisions; the Designated Safeguarding Lead will work in partnership with the Headteacher; relevant staff/senior leadership team in line with their [Roles and Responsibilities](#) and any other organisations as appropriate (see [Working in Partnership](#) and [Record Keeping and Information Security](#)).

Actions could include one or more of the below:

- **Manage internally/provide every day advice and support** in alignment with school policies and processes and the [SSCP Framework for Action](#) offering support to the child and their family through school pastoral support in a way which addresses the needs/risks identified. This may also include actions to make locations/school infrastructure (including online) safer; adapt our curriculum to ensure we are [Teaching our children how to keep safe](#); or [Working in Partnership](#).
- **Offer Extra Help/Community Based Early Help** in line with local [Framework for Action](#) and/or use of/referral to [local education inclusion arrangements](#); we will consider offering other support or intervention beyond internal management. This could include offering and/or referring a child and/or their family for enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Offer and refer to Family Help:** in line with local [Framework for Action](#) and/or use of/referral to [local education inclusion arrangements](#). Where is identified that a child and their family would benefit from a co-ordinated, multi-agency response and there are clear needs/risks we will offer and refer to Family Help. This could include offering and/or referring a child and/or their family for enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise Child Protection Concerns** in line with local [Framework for Action](#) and (if applicable) reporting requirements set out [Keeping children safe in education](#).
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police. The law may also require us to report concerns that crimes have been committed by others where children have not been directly involved (for example in the interests of community safety). We will follow our [Sharing safeguarding information with others](#) procedures, including using: [Sharing personal data with law enforcement authorities | ICO](#)

Where there is possible criminal behaviour by a child (including in circumstances of child-on-child abuse); we will take account of [When to call the police: guidance for schools and colleges](#).

Other local referral processes will also be followed as applicable: including referring to relevant multi-agency forums and processes as outlined in [relevant local tools and pathways](#) (e.g. to [Prevent Radicalisation](#); ensure [Online Safety](#); [respond to Domestic abuse](#)).

- **Report Hate-related behaviour to the Local Authority.** We will follow [hate relating incident reporting](#) processes where any behaviour is perceived by the reporting person or any other person that the incident was motivated by hostility or prejudice (or perceived hostility or prejudice) based on another person's:
  - Sex
  - Race
  - Religion
  - Sexual orientation
  - Disability
  - Transgender identity

In these circumstances we may also request the support of the [Victim Support IamMe! programme](#) to prevent and respond to hate-related behaviour.

### **Record actions, decisions, and outcomes.**

On the child protection file and in line with [Record Keeping and Information Security](#) . This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see [Working in Partnership](#)). The Designated Safeguarding Lead will keep detailed, accurate, written records of all concerns, discussions and decisions made including [their rationale](#). This should include instances where referrals were or were not made to another agency.

### **Manage and oversee any ongoing response.**

Once the initial actions are taken; the Designated Safeguarding Lead will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a child. Where this is decided; they will ensure that the school [works in partnership](#) with the child; parents, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.

The [SSCP Escalation/Resolution of Professional Disagreements Policy](#) will be used to challenge, resolve and if necessary escalate any concerns the school may have when working with other agencies in safeguarding children.

## Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures

We aim to prevent, identify, and respond to child-on-child abuse (including harassment and violence) at the earliest opportunity by:

- Expecting all staff and Governors/Trustees in our school to ensure they are adhering to and promoting the commitments we make in our [Safeguarding Statement](#).
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse (including harassment and violence). This includes ensuring staff are alert to what children might be at highest risk during and around the school day, including being alert to incidents that may have occurred outside of school, and/or online.
- **Ensuring** that our Designated Safeguarding Lead and other relevant staff have completed training in how to assess and respond to child-on-child abuse including [Harmful sexual behaviour, sexual harassment and sexual violence](#). For further detail; please refer to [Professional Development and Support](#).
- Being clear how we expect our children to behave towards one another. Our Behaviour Policy outlines these expectations; how the school will support our children to understand and fulfil them; and how we will prevent and respond to behaviour which falls below our expected standards (including all forms of bullying (see Anti-Bullying Policy)). Where behaviour also indicates child-on-child abuse (including harassment and violence); staff will adhere to the processes outlined in this section.
- Ensuring we are [Teaching our children how to keep safe](#).
- Making sure that children who experience or are at risk of experiencing abuse (including harassment and violence) from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive (including being harassing and violent) in their behaviour towards other children are identified, supported and safeguarded from engaging in further harmful behaviour.
- Making sure that we are taking positive action to ensure that [Children who are more vulnerable to child-on-child abuse](#) are not disproportionately impacted by child-on-child abuse (including harassment and violence) in our school.

### What is child-on-child abuse (including harassment and violence)?

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

- Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context; we know that child-on-child abuse (including harassment and violence) can take place in spaces and at times of the school day where children are less likely to be supervised. We also know that where child-on-child abuse (including harassment and violence) is taking place outside of school (including online) this abuse can also continue and have an impact on a child when they are at school.
- Can be defined in different ways including<sup>17</sup>, but may not be limited to:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

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<sup>17</sup> Further detail is outlined in [Keeping children safe in education](#) Part 1; Child-on-child abuse (including harassment and violence) and Part 5

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- [Serious violence including physical assault and harm, threats to cause serious harm or kill or the threat of harm with a weapon](#)
- [harmful sexual behaviour, sexual harassment and sexual violence](#)– which may include misogyny/misandry
- [consensual and non-consensual making or sharing of nudes and semi nudes](#), including those generated using AI.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- A child may experience one or multiple types of child-on-child abuse (including harassment and violence) at the same time.

### **Serious violence including: physical assault and harm, threats to cause serious harm or kill or the threat of harm with a weapon**

Serious violence is a continuing safeguarding concern. It may involve:

- physical assault,
- carrying, threatening with, or using weapons,
- threats to cause serious harm or kill

Serious violence can often take place in the context of child-on-child conflict or bullying, and it can also be associated with criminal exploitation.

Staff are expected to adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#) where a [child's behaviour towards other children causes safeguarding concern](#); including being alert to behaviour that causes concern outside of school (including online). This includes any concerns about a child carrying or using a weapon (or expressing intent to do so) towards another child.

The Designated Safeguarding Lead will follow [Our response to child-on-child abuse \(including harassment and violence\)](#) including carrying out a [Risk and needs assessment](#).

### **Harmful sexual behaviour, sexual harassment and sexual violence**

We follow [Keeping Children Safe in Education](#) Part 5: child-on-child sexual harassment and sexual violence to recognise and respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. As outlined in [Professional development and support](#), everyone who works for the school is expected to read and follow Part 5. Designated Safeguarding Leads will carry out Brook Traffic Light Training to help them to [respond to child-on-child abuse \(including harassment and violence\)](#).

In ensuring that staff are not downplaying and can recognise harmful sexual behaviour, sexual harassment and sexual violence, it is important that they understand the applicable laws and are careful about making professional judgments about [Sexual development and behaviour in children](#). This includes understanding what consent is and the age of consent; as well as the age of criminal responsibility (all of which is outlined in [Keeping Children Safe in Education](#) Part 5).

We are aware that and will adhere to the mandatory duty to report child sexual abuse<sup>18</sup>, following the publication of statutory guidance which is expected to come into force this academic year.

Staff should not make decisions about children's sexual behaviour on their own. Staff are expected to seek the support, advice and expertise of the Designated Safeguarding Lead on this subject.

Where there are concerns indicating child-on-child harmful sexual behaviour, sexual harassment and/or sexual violence (as outlined in [Keeping Children Safe in Education](#) Part 5). Staff are expected to adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#). This includes behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Any misogynistic or misandrist behaviours should also be reported.

### **Consensual and non-consensual making or sharing of nudes and semi nudes**

Taking and sharing nude or semi-nude explicit images, including those generated using AI of those aged under 18 is a criminal offence.<sup>19</sup>

Where staff become aware that a child:

- has or may have shared a nude or semi-nude images, including those generated using AI either of themselves or another child; or
- has or may have had such images, including those generated using AI of themselves shared by another child or children;

they are expected to follow [Sharing nudes and semi-nudes: how to respond to an incident](#) and adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#). This expectation applies even if the child indicates that they have consented to the images being shared (please also see [Harmful sexual behaviour, sexual harassment and sexual violence](#)). Staff should immediately report their concerns to the Designated Safeguarding Lead if there is any indication of adult involvement (including concerns that an adult may be pretending to be a child).

The [Designated Safeguarding Lead Response](#) to reports of consensual and non-consensual making or sharing of nude or semi-nude images, including those generated using AI will include reference to:

- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [AI Generated Child Sexual Abuse Material Guides for Professionals | Internet Watch Foundation & National Crime Agency](#)

### **Children who are more vulnerable to child-on-child abuse (including harassment and violence)**

Please read this alongside [Children potentially at greater risk of harm](#).

Children who are perceived to be different to others can be particularly vulnerable to child-on-child abuse (including harassment and violence). When children are abused by other children; there is more often than not a misuse of power or privilege by the child(ren) causing harm. This can have a significant impact on the emotional development and mental wellbeing of the child who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

Children who harm others may have additional or complex needs. Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience<sup>20</sup> in their life. Children who harm other children may have power or privilege over a child(ren) they are causing harm to but can also be powerless or vulnerable in other part of their lives.

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<sup>18</sup> Further information available at: [Mandatory reporting of child sexual abuse in England: update on the Crime and Policing Act | NSPCC Learning](#)

<sup>19</sup> See legislation and guidance at: [Safeguarding, sexting and sharing nudes | NSPCC Learning](#)

<sup>20</sup> See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

Child-on-child abuse (including harassment and violence) is harmful to all children involved.

Evidence<sup>21</sup> indicates that children from groups are more vulnerable to child-on-child abuse (including harassment and violence). This includes children who:

- Have [special education needs and/or disabilities and/or health issues](#).
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian, Mixed Heritage and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). These children are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias<sup>22</sup>.
- Are [Lesbian Gay or Bi-Sexual](#). These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
- Are [questioning their gender](#). These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
- Are female. Girls are generally more vulnerable experiencing child-on-child abuse (including harassment and violence) and to [Harmful sexual behaviour, sexual harassment and sexual violence](#) and abuse in intimate personal relationships. They can however also abuse (including harass and behave violently towards) other children.
- Are male. Boys are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

Boys are more likely to be involved in [serious violence](#) including towards other children; particularly if:

- they have already experienced child maltreatment;
- previously been a victim of or perpetrated serious violence;
- are [Children whose behaviour causes concern](#), and/or [attend \(or have attended\) Alternative Provision](#).

Older boys are also more vulnerable to displaying harmful sexual behaviour; particularly if they have already experienced trauma and family difficulties.

Where a child has several differences and would fall into multiple groups above; this further increases their vulnerability.

## When is child-on-child behaviour considered abusive?

We recognise the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse and/or [Serious violence including: physical assault and harm, threats to cause serious harm or kill or the threat of harm with a weapon](#).

In considering whether behaviour is abusive; staff should consider:

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<sup>21</sup> Evidence sources:

- [Keeping children safe in education Part 2, Part 5 and Annex A](#)
- [Prevalence of bullying \(anti-bullyingalliance.org.uk\)](#).
- [Safeguarding d/Deaf and disabled children | NSPCC Learning](#);
- [Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning](#);
- [Safeguarding LGBTQ+ children and young people | NSPCC Learning](#);
- [Spotlight #3: Young people and domestic abuse | Safelives](#).
- [Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)
- [Children and young people who display harmful sexual behaviour | CSA Centre](#)

<sup>22</sup> [Adultification bias within child protection and safeguarding \(justiceinspectorates.gov.uk\)](#)

- **The impact on the child(ren) affected by the behaviour:** Any behaviour that is likely to have an impact on a child's physical and emotional health and development should be considered potentially harmful. The greater the impact of the behaviour on the child's health and development; the greater level of harm caused to them.

The needs and circumstances of the child who is identified as being potentially harmed; including whether they are already identified as [Children potentially at greater risk of harm](#) should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.

Even where children do not/are not able to express their wishes and feelings; staff should also pay attention to other potential signs/indicators of abuse (please refer further to [Staff Safeguarding Concerns: Recognise, Respond, Report](#))

Children raising child-on-child concerns either for themselves or others will be taken seriously and never be given an impression they are creating a problem.

- **The behaviour of the child(ren) who is/are allegedly causing harm:** It is important to consider the behaviour of children on a continuum; taking account of their age and level of development; as well as any other needs or circumstances that may influence their behaviour (for example a child who is causing harm to other children could be an indication that they have unmet needs; or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them).

Features of abusive behaviour<sup>23</sup> can include:

- A pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)
- A misuse of power over the child who is being harmed. (please also see children who are more vulnerable above).
- Victimisation of the child who is being harmed. This could also include circumstances where the child causing harm is supported or joined by other children.
- Intrusive behaviour; not considering or enabling the child being harmed to freely agree and/or consent to the behaviour.
- An element of control; coercion and/or force.
- Physical/sexual violence including threats to cause serious harm or kill, or the threat of harm with a weapon (this does not always have to be present; but where it is so would heighten the level of concern).
- Evidence that a child is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

## Our response to child-on-child abuse (including harassment and violence)

In most instances, we will use our Behaviour policy to manage the conduct of children towards each other. However, where [children's behaviour causes safeguarding concern](#); then staff will also need to raise such concerns to the Designated Safeguarding Lead in line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) section.

In responding to any concern of child-on-child abuse (including harassment and violence); we will take account of:

- [Keeping children safe in education](#): Part 5 ( [Harmful sexual behaviour, sexual harassment and sexual violence](#)), Part 1 and Annex A & B ( [Serious violence](#)).

<sup>23</sup> Adapted from Hackett Continuum as described in [Understanding sexualised behaviour in children | NSPCC Learning](#). When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non Harmful Sexual Behaviour) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider (see [Farrer and Co \(2022\) page 35-36](#))

- [Use of reasonable force in schools](#)
- [Searching, screening and confiscation at school](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [When to call the police: guidance for schools and colleges.](#)
- Local [hate relating incident reporting](#) processes (when applicable)
- Brook Traffic Light Tool (when applicable)
- The local [Framework for Action](#) including relevant local tools, pathways and support

#### Risk and needs assessment.

All staff will immediately consider how best to support and protect **all children involved** in child-on-child abuse (including harassment and violence) incidents; ensuring they act in their best interests.

We may deem it necessary to complete a formally recorded risk and needs assessment for all children involved in child-on-child abuse (including harassment and violence) incidents. The decision to complete a formal risk assessment will be taken by the Designated Safeguarding Lead. This formal assessment will always take place where there is evidence of:

- [Serious violence including: physical assault and harm, threats to cause serious harm or kill or the threat of harm with a weapon](#)
- Sexual Violence (as outlined in [Keeping Children Safe in Education](#) Part 5)
- Any other [child-on-child behaviour \(including harassment and violence\) that is considered abusive](#)

The risk and needs assessment will clearly identify and outline the strategies to be put in place to address risks and needs and so safeguard:

- **All children involved including:**
  - [The safety and support needs of/risks to child\(ren\) directly affected by the behaviour](#)
  - [The safety and support needs of/risks to and from child\(ren\) who is/are allegedly causing harm](#)
  - child(ren) attending the school who have been indirectly affected by or involved in the behaviour or may be at risk of further behaviour
  - other child(ren) who may not be at the school who may have been affected by or involved in the behaviour or may be at risk of further behaviour (for example siblings or children who attend other education provisions)
  - **Any adults who may be at risk.** This might include staff or parents/carers who may be at risk of child to parent/carer abuse from the child who is causing harm. (please refer to local [Multi-Agency Policy: Child to Parent Abuse \(CPA\)](#))
  - **The School**, including considering the wider school community and any steps that may be needed to improve the safety of the school. For example, considering the location and time where harm has allegedly taken place, and considering what steps need to be taken to improve safety.

The risk and needs assessment will be completed using relevant evidence-based assessment tools as applicable; taking account of information from all key staff (and relevant involved professionals) working with the children, as well as their parents/carers. It will also include the views and feelings of the children; where this is safe and appropriate to do so.

The risk assessment will be shared with all staff and relevant involved professionals who work with the children; as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

We use a template risk and needs assessment.

## Response

The parents/carers of **children who attend the school and are directly involved** will be notified of and involved in our response. We will only share the details of other children to parents/carers who do not have parental responsibility for them where we have consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child (please also refer to [Record Keeping and Information Security](#)). If we identify other child at risk/in need who do not attend our school; we will Work in Partnership as part of our response.

The risk and needs assessment will inform the response taken. The following responses will be considered; (more than one response can be considered):

- **Manage internally/provide every day advice and support** in alignment with our Behaviour Policy and pastoral support offer in a way which addresses the needs/risks identified. Any sanctions imposed on the child causing harm will be proportionately balanced with any other responses (such as police involvement) and take accounts of risks and needs; as well as the ongoing impact on/risk to the child who has been harmed or others. This may also include actions to make locations/school infrastructure (including online) safer; adapt our curriculum to ensure we are [Teaching our children how to keep safe](#); or [Working in Partnership](#).
- **Offer Extra Help/Community Based Early Help** in line with local [Framework for Action](#) and/or use of/referral to [local education inclusion arrangements](#); we will consider offering other support or intervention beyond internal management. This could include offering and/or referring **any child involved (directly or indirectly) who attends the school** to enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Offer and refer to Family Help:** in line with the local [Framework for Action](#) and/or use of/referral to [local education inclusion arrangements](#). Where is identified that **any child involved (directly or indirectly) who attends the school** would benefit from a co-ordinated, multi-agency response and there are clear needs/risks we will offer and refer to Family Help. This could include offering and/or referring **any child involved (directly or indirectly) who attends the school** to enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise Child Protection Concerns** in line with local [Framework for Action](#) and (if applicable) Part 5 [Keeping children safe in education](#).
- **Report to the Police.** We will take account of [When to call the police: guidance for schools and colleges](#) and (if applicable) Part 5 [Keeping children safe in education](#) and/or [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- **Report Hate-related behaviour to the Local Authority.** We will follow [hate relating incident reporting](#) processes where any child-on-child behaviour is perceived by the reporting person or any other person that the incident was motivated by hostility or prejudice (or perceived hostility or prejudice) based on another person's:
  - Sex
  - Race
  - Religion
  - Sexual orientation
  - Disability
  - Transgender identity

In these circumstances we may also request the support of the [Victim Support IamMe! programme](#) to prevent and respond to hate-related behaviour.

## Recording and monitoring

All child-on- child abuse concerns and responses will be recorded and stored on the child protection files of all involved children (Please refer to [Record Keeping and Information Security](#)). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on CPOMS.

## Appendix B: File Transfer Record and Receipt

You may wish to add your school/college/setting logo on to this proforma.

PART 1: To be completed by sending / transferring setting, school or college.

|                                                                             |                                          |
|-----------------------------------------------------------------------------|------------------------------------------|
| NAME OF CHILD:                                                              |                                          |
| DOB:                                                                        |                                          |
| NAME OF SCHOOL/SETTING<br>SENDING CP FILE incl STRUCTURED<br>SUMMARY:       |                                          |
| ADDRESS OF SCHOOL/SETTING<br>SENDING<br>CP FILE incl STRUCTURED<br>SUMMARY: |                                          |
| METHOD OF DELIVERY:                                                         | BY HAND    SECURE POST<br>ELECTRONICALLY |
| DATE FILE SENT:                                                             |                                          |
| NAME OF DSL TRANSFERRING<br>FILE:                                           |                                          |
| NAME OF PERSON TRANSFERRING<br>TO:                                          |                                          |
| SIGNATURE:                                                                  |                                          |

PART 2: To be completed by receiving setting, school or college.

|                                                 |  |
|-------------------------------------------------|--|
| NAME OF<br>SCHOOL/SETTING<br>RECEIVING FILE:    |  |
| ADDRESS OF<br>SCHOOL/SETTING<br>RECEIVING FILE: |  |
| DATE RECEIVED:                                  |  |
| NAME OF PERSON<br>RECEIVING FILE:               |  |
| DATE<br>CONFIRMATION<br>OF RECEIPT SENT:        |  |
| SIGNATURE:                                      |  |

**Receiving School:** Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You are advised to keep a copy for your own reference.

## Appendix C: Safeguarding Concern Reporting Form

Recording a concern about a child's safety or welfare

Part 1 – For staff use.

|                                                                                                                                                                                                                                                              |                                                                                                  |                                    |  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------------------|--|
| <b>Child Name:</b>                                                                                                                                                                                                                                           |                                                                                                  |                                    |  |
| <b>Date of birth:</b>                                                                                                                                                                                                                                        |                                                                                                  | <b>Year Group / class:</b>         |  |
| <b>Name of referrer:</b>                                                                                                                                                                                                                                     |                                                                                                  | <b>Role of referrer:</b>           |  |
| <b>Details of concern:</b><br><br><i>What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?</i><br><br><i>What is the pupil's account/perspective?</i> | <i>(body maps are available <a href="#">in the West midlands Physical Abuse Procedures</a> )</i> |                                    |  |
| <b>Reported to:</b>                                                                                                                                                                                                                                          |                                                                                                  | <b>Role of person reported to:</b> |  |
| <b>Signed:</b>                                                                                                                                                                                                                                               |                                                                                                  |                                    |  |
| <b>Date:</b>                                                                                                                                                                                                                                                 |                                                                                                  |                                    |  |

Part 2: For DSL/Deputy DSL to complete.

**What actions have been taken by the DSL:**

*Ensure you also include the reasons for any actions taken or not taken.*

*Also note if this concern is a Key/Significant Event in the child's life or you consider there to be a pattern of concerns/cumulative harm emerging (please refer to [Storage and management of safeguarding information \(child protection files\)](#))*

**Has the concern / referral been discussed with parent / carer?**

If yes note discussion

***If not, state reasons why:***

**Referral made to:**

*Record names of individuals/agencies who have given information regarding outcome of any referral (if made).*

***Explain why the referral was made (rationale):***

|                                            |  |                 |              |
|--------------------------------------------|--|-----------------|--------------|
| <b>Feedback<br/>given to<br/>referring</b> |  | <b>By whom:</b> | <b>Date:</b> |
|--------------------------------------------|--|-----------------|--------------|

|                                                                  |                                                                                                  |                 |              |
|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-----------------|--------------|
| <b>member of staff:</b>                                          |                                                                                                  |                 |              |
| <b>Response to / action taken with child/ parent:</b>            | <i>Ensure you also include the reasons for any actions taken or not taken</i>                    | <b>By whom:</b> | <b>Date:</b> |
| <b>Other notes / information:<br/>Any other action required:</b> | <i>Ensure you also include the reasons for any actions taken or not taken or decisions made.</i> |                 |              |
| <b>Signature of DSL :</b>                                        |                                                                                                  | <b>Date:</b>    |              |