Learning Community Trust

Child Protection and Safeguarding Policy 2026/2027

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Commitment to review

This policy will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in government legislation or any changes in the duty of statutory agencies in child protection and/or the wider safeguarding agenda. If it is not appropriate to refine the policy during the year, then this will be done as a matter of course on yearly basis by a named person responsible below, who shall be accountable for that action. This policy will also be updated to reflect any statutory changes arising from future safeguarding legislation and statutory guidance.

Purpose and Scope

Learning Community Trust (LCT) is committed to safeguarding and promoting the welfare of every child and young person across the Trust. Safeguarding is everyone's responsibility and is fundamental to our mission to provide an inclusive, compelling and transformative education in which every child is safe, valued, respected and able to thrive.

Our approach is rooted in the Trust values:

- A Trust with Heart
- Never Leave a Child Behind
- Respect for All
- Coping with the Challenges of Life
- Successful Young People
- Learning for All
- Thriving Community
- Together we are Stronger

These values underpin our commitment to creating strong safeguarding cultures in which the best interests of children are at the centre of decision-making, concerns are identified and acted upon promptly, children are listened to and taken seriously, and appropriate help and protection are provided at the earliest opportunity.

The Trust recognises that safeguarding is broader than responding to incidents of abuse. It encompasses the actions we take to provide help and support to meet the needs of children as soon as problems emerge; protect children from maltreatment, whether within or outside the home, including online; prevent impairment of children's mental and physical health or development; ensure that children grow up in circumstances consistent with the provision of safe and effective care; and take action to enable all children to have the best outcomes.

This policy establishes the Trust-wide framework through which these responsibilities are fulfilled and should be read and implemented in accordance with Keeping Children Safe in Education 2026 (KCSIE) and Working Together to

Safeguard Children 2026, together with other relevant legislation, statutory guidance, local safeguarding partnership procedures and Trust policies.

Our Trust-wide safeguarding priorities

The Trust uses safeguarding intelligence, incident data, local and national priorities, pupil and family voice, quality assurance activity and emerging risks to inform its safeguarding strategy. While risks vary between individual academies and communities, Trust-wide analysis has identified the following as key areas of continuing focus:

- children's mental health and emotional wellbeing;
- online safety and online harms (including the use of Artificial Intelligence);
- child-on-child abuse, recognising that it can happen in any setting and must never be dismissed as banter or an inevitable part of growing up;
- domestic abuse and its impact on children;
- child sexual abuse and exploitation, including group-based exploitation;
- ensuring children and families receive effective family help at the earliest appropriate point; and
- identifying and reducing the additional barriers and vulnerabilities experienced by particular groups of children.

We recognise that children may experience multiple and overlapping forms of harm and that vulnerability is not static. Staff must remain professionally curious and consider the child's experiences within their family, peer group, community and online environments.

Particular attention is given to children who may face additional barriers to recognising or reporting abuse or accessing help. This includes, but is not limited to, children with SEND; children with a social worker; looked-after and previously looked-after children; children in kinship care; children experiencing disadvantage; children who are absent or missing from education; children experiencing domestic abuse; children affected by parental substance misuse or illness; children at risk of exploitation; migrant, refugee and asylum-seeking children; and children who may experience discrimination or prejudice.

Safeguarding practice across LCT will be inclusive and responsive to children's individual needs, communication methods and lived experiences. We expect staff to recognise and challenge discrimination and ensure that assumptions about a child's background, behaviour, disability, identity or circumstances do not become a barrier to identifying harm or providing effective support.

Our safeguarding culture

Across LCT, safeguarding is not treated as a standalone compliance activity. It is embedded within leadership, governance, curriculum, attendance, behaviour, SEND, pastoral support, recruitment, staff development, online safety and the day-to-day culture of every academy.

We expect every academy to maintain a culture in which:

- safeguarding is understood to be everyone's responsibility;

- the best interests of the child are paramount;
- children know how to seek help and have confidence that adults will listen and act;
- staff maintain professional curiosity and understand that safeguarding concerns may present in different ways;
- child-on-child abuse is recognised, challenged and responded to appropriately;
- there is a clear understanding that "it could happen here";
- concerns are recorded, shared and escalated promptly;
- information is shared appropriately and in a timely way where this is necessary to safeguard a child;
- effective family help is sought and provided as soon as needs emerge;
- safeguarding practice is inclusive and removes barriers that may prevent children from disclosing harm or accessing support;
- safer recruitment and appropriate management of allegations and low-level concerns contribute to a strong culture of professional safeguarding; and
- leaders and those responsible for governance routinely evaluate the effectiveness, rather than simply the existence, of safeguarding arrangements.

Safeguarding Leadership Roles

Each academy maintains a clear safeguarding leadership structure that ensures effective oversight, sufficient capacity and appropriate safeguarding expertise. There are linked job descriptions outlining each of these roles.

Designated Safeguarding Lead (DSL)

Each academy appoints a Designated Safeguarding Lead who is a senior member of the academy's leadership team and has overall lead responsibility for safeguarding and child protection. The DSL has the appropriate authority, status, time, training and resources to fulfil the role effectively and provides strategic leadership of safeguarding across the academy. The DSL maintains oversight of safeguarding practice, concerns and case management; provides advice and support to staff; works with children and families; liaises with children's social care and other agencies; and ensures that safeguarding arrangements, records, referrals and responses are effective and compliant with statutory requirements. Some activities may be delegated to appropriately trained deputies; however, ultimate lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

Deputy Designated Safeguarding Lead (DDSL)

Academies appoint an appropriate number of Deputy Designated Safeguarding Leads to provide sufficient safeguarding capacity and continuity. DDSLs must be trained to the same standard as the DSL and may undertake any of the activities of the DSL that have been delegated to them. This may include responding to safeguarding concerns, managing cases, making referrals, liaising with children, families and external agencies, supporting staff and contributing to safeguarding monitoring and quality assurance. A DDSL may act on behalf of the DSL when the

DSL is unavailable; however, the DSL retains ultimate lead responsibility for safeguarding and child protection within the academy.

Designated Safeguarding Officer (DSO)
Academies may appoint Designated Safeguarding Officers to provide additional safeguarding capacity and ensure that appropriately trained staff are readily available to respond to concerns. DSOs will undertake appropriate safeguarding training, including DSL-level training, and work within the safeguarding arrangements established by the DSL.
A DSO may receive and respond to safeguarding concerns, provide advice to staff, contribute to safeguarding records and chronologies, support agreed safeguarding actions and, where appropriately trained and authorised, contribute to referrals and casework. DSOs must recognise the boundaries of their role and escalate significant, complex or uncertain safeguarding matters to the DSL or DDSL.

Appointment as a DSO does not confer the statutory role, authority or strategic accountability of the DSL or DDSL. The DSL retains overall lead responsibility for safeguarding and child protection, supported by the DDSL(s), with DSOs providing additional operational safeguarding capacity.

The academy must ensure that an appropriately trained safeguarding lead is available during school hours for staff to discuss safeguarding concerns. Arrangements for safeguarding cover, including during out-of-hours or off-site activities where appropriate, must be clear, proportionate to the academy's context and communicated to all staff.

Monitoring

The Trust expects academies to teach children how to keep themselves and others safe through a carefully planned and responsive curriculum. Safeguarding education should reflect the age, developmental stage, needs and vulnerabilities of pupils and respond to emerging safeguarding intelligence. Appropriate adaptations must be made so that pupils with SEND and other additional needs can understand, access and apply this learning.

The Learning Community Trust maintains strategic oversight of safeguarding across all academies through a risk-based programme of monitoring, quality assurance and challenge. Safeguarding effectiveness is evaluated through regular analysis of Trust-wide safeguarding data and emerging themes; academy safeguarding reviews and audits; scrutiny of safeguarding records, including the quality of recording, categorisation, chronologies and actions; checks on single central records, safer recruitment and statutory compliance; and evaluation of attendance, children missing or absent from education, child-on-child abuse, online safety and other contextual risks.

Education Directors routinely review safeguarding as part of their line management and quality assurance activity, while Designated Safeguarding Leads contribute to Trust-wide networks, peer review and professional development to identify emerging

risks and strengthen practice. Pupil, staff and, where appropriate, parent voice is used alongside case sampling to evaluate the lived experience of safeguarding and whether children feel safe, know how to seek help and have confidence that adults will respond. Findings are triangulated with external assurance, including annual local authority safeguarding audits. Identified concerns are recorded, escalated and followed through to completion, with additional support, challenge or targeted review provided where required.

The Trust Board and relevant committees receive regular safeguarding assurance and analysis, enabling those responsible for governance to scrutinise compliance, identify trends and evaluate the effectiveness of safeguarding culture and practice across the Trust. This continuous cycle of assurance, challenge, action and review ensures that safeguarding arrangements remain effective, responsive to changing risks and focused on improving outcomes for children.

Scope

This policy applies to all children and young people under the age of 18 attending or receiving education through a Learning Community Trust academy and to all adults working with or on behalf of the Trust, including employees, agency and supply staff, contractors, volunteers, governors, trustees and visitors where applicable.

The policy applies across all Trust activities and provision, including education provided on academy premises, educational visits, off-site activities, work experience, extended provision, alternative provision and education commissioned from another provider.

Where an academy commissions or uses alternative provision, responsibility for safeguarding the pupil remains with the academy. Appropriate safeguarding and quality assurance arrangements must therefore be established and maintained.

Academies covered by this policy

This policy applies to the following academies within Learning Community Trust:

Nursery provision

- Allscott Meads Primary and Nursery
- Hadley Learning Community Primary and Nursery
- Lantern Primary and Nursery
- Wrekin View Primary and Nursery

Primary education

- Allscott Meads Primary and Nursery
- Crudgington Primary
- Hadley Learning Community Primary and Nursery
- Lantern Primary and Nursery
- Wrekin View Primary and Nursery

Secondary education

- Burton Borough School
- Hadley Learning Community Secondary
- Charlton School
- New Road Academy
- Ercall Wood Academy

Specialist provision

- Queensway North and South
- Severndale Academy

Alternative provision

- Kickstart Academy

Where an academy operates early years provision, it must additionally comply with the safeguarding and welfare requirements of the current Early Years Foundation Stage statutory framework.

Severndale Academy is located within Shropshire and will follow the relevant Shropshire safeguarding partnership and local multi-agency procedures where these apply. Other LCT academies will follow the procedures and thresholds of the Telford & Wrekin Safeguarding Partnership, alongside relevant regional child protection procedures.

Related legislation, statutory guidance and Trust policies

This policy should be read alongside relevant legislation, statutory guidance, local safeguarding procedures and associated Trust policies, including, but not limited to:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- the current Early Years Foundation Stage statutory framework, where applicable
- Children Act 1989 and Children Act 2004
- Education Act 2002
- Equality Act 2010
- Human Rights Act 1998
- current statutory guidance relating to information sharing for safeguarding purposes
- What to do if you're worried a child is being abused: advice for practitioners
- Telford & Wrekin Safeguarding Partnership policies, procedures and thresholds
- Shropshire safeguarding partnership procedures, where applicable
- relevant West Midlands regional child protection procedures
- LCT Child-on-Child Abuse Policy
- LCT procedures for managing safeguarding concerns or allegations about staff, supply staff, contractors and volunteers, including low-level concerns
- LCT Safer Recruitment Procedures
- LCT Whistleblowing Policy
- LCT Behaviour Policy

- LCT Attendance Policy
- LCT SEND Policy
- LCT Online Safety/Mobile and Smart Technology Policy
- LCT Alternative Provision Policy
- LCT Mental Health and Wellbeing Policy
- LCT Use of Reasonable Force Policy
- LCT Complaints Policy
- relevant policies concerning drugs and substance misuse and suicide intervention.

All staff must work in accordance with the current statutory guidance and local safeguarding procedures. Where statutory guidance or legislation is amended during the lifetime of this policy, the most current statutory requirements will take precedence.

Our safeguarding team

Our safeguarding team		
Designated Safeguarding Lead and Online Safety Lead	Name Heather Murphy	
Designated teacher for looked-after and previously looked after children	Name Heather Murphy	
Family Help Lead (if applicable)	Name Heather Murphy	
CSE DSL and Deputy Designated Safeguarding Lead	Name Letitia Suarez	

Designated Safeguarding Officer	Name Jacqueline Massey	
Designated Safeguarding Officer	Name Clare Tabberer	Photograph
Designated Safeguarding Officer	Name	Photograph
Safeguarding Governor	Name Sue Wright	
Prevent Governor	Name Sue Wright	
Academy Trust Safeguarding Lead	Maddie Griffin	

Our safeguarding approach

New Road Academy (NRA) is positioned in a complex community with deprivation indicator above average. The school cohort indicates that the school is well above national averages in SEND and Disadvantage. 47% of NRA students are Pupil Premium. We have close to average numbers of EAL and EHCPs. Students start their educational journey at NRA below national in reading, writing and Mathematics, and stability figures are well below average.

Our approach to safeguarding considers our locational context and reflects the needs of our students. We recognise that our local area has been impacted greatly by safeguarding concerns, including those evidenced in the publication of the Independent Inquiry – Telford Child Sexual Exploitation (IITCSE). Recommendations from the enquiry have been identified at local authority level and we understand the huge role schools can play in ensuring that our children are protected. We have a dedicated CSE Lead – Letitia Suarez - to oversee the monitoring and mapping of CSE within our school cohort.

The protection and safety of our children and staff is at the very foundations of our operational safeguarding practice. Safeguarding is a golden thread that weaves within our curriculum and the wider daily lives of our children and our community.

For this policy to be effective, staff have to understand our local context and build a solid knowledge of issues that may present in Telford, our local community and especially within our school. This focused understanding is why our policy bends and shifts with the ever-changing needs of our children, staff and community. This flexible, proactive safeguarding approach means our staff are constantly learning and continuously developing effective strategies to safeguard. This knowledge-driven response then supports our continual professional development strategies and curriculum design to ensure that all key areas are skilfully managed by all stakeholders.

As a result, there is a firm commitment from the leadership of New Road Academy to maintain a strategic whilst reactive policy that will be flexible to change. We will not only focus on our local context but be aware of national agendas, government legislation or any changes in the duty of statutory agencies in child protection and/or the wider safeguarding agenda.

<u>TWSP Priorities:</u>
Telford and Wrekin Safeguarding Partnership identified their priorities for 2026/27 as follows:

- Developing how we prevent harm to children and provide support at the earliest opportunity through the provision of Family Help
- Ensuring an effective partnership response to domestic abuse and its impact on children
- Strengthening the partnership response to child sexual and criminal exploitation
- Improving the response to children with emotional wellbeing and mental health difficulties

<u>Additional NRA Priorities due to local context</u>:
As a school, we are prioritising all Telford and Wrekin priorities as well as all recommendations from the IITCSE report advised for schools.

To support with this, we have increased the regularity of elements of staff training related to CSE.

In addition to the TWSP priorities and IITCSE recommendations, we continue to prioritise the following issues due to our local area context:

- Mental Health support
- Drugs and alcohol awareness and support (including parental substance misuse)
- Prevent awareness
- Online safety including the use of AI technology
- The ever growing impact of the cost of living crisis
- Radicalisation
- Exploitation
- Children who are persistently and/or severely absent from education

Our approach towards safeguarding concerns at NRA, particularly those in relation to child-on-child abuse is not only that "it can happen here", rather that "it does happen here" and it is our duty to ensure all students feel safe and supported. Therefore ensuring the right help reaches the right place at the earliest possible opportunity. Family support is a key element of our provision, both internally and alongside external partners and professionals. This is to ensure early help is provided at the right time as set out in Working together to safeguard children 2026.

Our local context also has to take into consideration the site security of NRA. We are located next to the main road, have a public footpath that runs along the front of the school building, and some of our playing fields are outside of our secure line due to being owned by the local community rather than the school. Risk assessments of site security therefore include consideration of those areas immediately in our vicinity which we consider to be a potential risk for our students during the school day.

Safeguarding is a high priority, and we want to ensure compliance and an effective safeguarding culture at New Road Academy.

Implementation

Safeguarding is an integral part of our School Improvement Plan. Our key priorities for 2026-27 are:

1	To continue to deliver a robust programme for all stakeholders in order to ensure that the mental health, wellbeing and support for all students and staff are integral to NRA practice (including mental health, online safety, local area context and child on child abuse)

2	To continue to promote inclusivity and trauma-informed practice in all aspects of school life.
3	To continue to ensure robust and rigorous relationships between the school and external providers (including alternative provision and other support services)
4	To further embed and enhance the quality of logging safeguarding concerns by staff through CPOMs to ensure coherency and consistency
5	To use safeguarding data to ensure …
6	To further embed safeguarding and wellbeing structures including increased clarity over early/family help systems available to all stakeholders. Getting the right help and support at the right time is essential.
7	To ensure continued updates in relation to the local area context are embedded within the delivery of safeguarding via teaching and learning and pastoral support
8	To develop a strategic approach to the monitoring and support of vulnerable learners.
9	To build on the strength of Personal Development (PSHE) through the continued development of the curriculum and staffing structure to ensure the highest quality of education

Our early/family help offer reflects our commitment to ensuring that the right help reaches the right child at the earliest possible opportunity. Through a graduated and child-centred approach, we identify emerging needs, reduce barriers to learning and wellbeing, and work in partnership with families and agencies to secure positive outcomes for all children.

Early/family help may include a range of support tailored to the needs of the child and family, including pastoral support, attendance interventions, mentoring, emotional wellbeing support, behaviour support, special educational needs provision, family support, advice and guidance, and signposting or referrals to external agencies. Where appropriate, the school may initiate or contribute to an Early Help Assessment and participate in meetings to coordinate support.

We recognise that children may require support at different times in their lives and that effective early intervention can prevent concerns from escalating. By working collaboratively with children, families and partner agencies, we seek to build resilience, promote wellbeing, improve outcomes and ensure that pupils are safe, supported and able to thrive. Further examples of early/family help support include attendance and punctuality support, transition support, mental health and emotional wellbeing interventions, support for young carers, assistance with parenting strategies, support relating to friendships and peer relationships, risk-taking behaviours, online safety concerns, and accessing specialist services where additional needs are identified. We also have a successful EAL hub.

Our lead DSL monitors the safeguarding needs of the school and works closely with the Deputy Heads (Curriculum & Pastoral) and PSHE (Personal Development) Lead

to ensure that our curriculum is tailored to the school and local context and is responsive to the needs of our students. We promote the reporting of child-on-child abuse by all parties, including parents via the website (through the “Big Red Button”) and through strong relationships with staff. We encourage all students to report any concerns they have, however small to ensure all students feel safe and supported. We will continue to develop the use of the Student Council to provide support on a student-to-student basis in relation to bullying, racism and child-on-child abuse. This has proven very effective in the past. Our safeguarding curriculum is data driven, reactive and tailored to meet the needs of pupils at New Road Academy, especially SEND students.

Impact

Regular monitoring of safeguarding takes place through the analysis of recorded incidents on CPOMs and our analysis of the progress of vulnerable learners. Data analysis of pastoral concerns and academic progress enables us to identify trends within each year group and this feeds into the reactive lessons within Personal Development (PSHE) as well as the established curriculum in that subject.
Safeguarding supervision is available at all levels within the school and wider Trust, and the Lead DSL meets regularly with the link Governor to audit safeguarding.
We engage with the Telford & Wrekin Safeguarding Partnership to complete an annual audit on safeguarding at NRA.
Parent/Carer and pupil voice is collected through the year via the School Council and parent surveys.

The implementation of this Child Protection and Safeguarding Policy ensures that safeguarding remains at the heart of NRA’s culture and practice. As a result, pupils feel safe, valued, and listened to, knowing that trusted adults will act in their best interests. Staff are confident in recognising and responding to safeguarding concerns, and leaders maintain effective oversight of child protection practice. Our preventative and child-centred approach helps to ensure that vulnerabilities are identified promptly, the right support is accessed at the earliest opportunity, and children are protected from harm.
Ultimately, the impact of this policy is evidenced through improved pupil wellbeing, strengthened safeguarding outcomes, effective partnership working, and a culture in which every child is supported to feel safe, thrive, and achieve their potential.

Summary & aims

1. We have regard for the statutory guidance from the Department for Education (DfE) issued under Section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). This policy has been developed in line with legal

obligations, including, where applicable, the Human Rights Act 1998, the European Convention on Human Rights, the Domestic Abuse Act 2021, the Children and Social Work Act 2017, the Equality Act 2010, and the Public Sector Equality Duty, the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

2. This policy is aligned with the statutory guidance Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children 2026
3. This policy reflects the latest definitions, expectations, and safeguarding responsibilities for all staff, volunteers, and governors in educational settings.
4. We will also follow the DfE's What to do if you are Worried a Child is Being Abused – Advice for Practitioners. We recognise that the NSPCC website provides additional information on abuse, neglect, exploitation, and indicators of harm.
5. All child protection matters will be dealt with in line with the arrangements of Telford and Wrekin Safeguarding Partnership (TWSP) or Shropshire Safeguarding Community Partnership (Severndale) and West Midlands Child Protection and Safeguarding Procedures or, if relevant, the safeguarding partnership area children reside in, under the care of or with designated responsibility.
6. We are committed to maintaining an open and positive safeguarding culture where children feel that they belong, are valued, are kept safe and are able to thrive. We regularly evaluate the effectiveness of our safeguarding arrangements through leadership oversight, governor scrutiny, safeguarding audits, pupil voice, parent feedback, staff consultation and external review. This evaluation informs our safeguarding improvement planning and helps ensure that safeguarding remains effective, responsive and centred on the lived experience of children.
7. This policy replaces the previous policy of 1st September 2025
8. We have a duty of care to all pupils and their families, and staff. The safety and protection of all children is of paramount importance to all those involved in education. The aim of this policy is to make all within our setting feel safe, promote their welfare and have clear roles and responsibilities in place for that to happen. We are committed to inter-agency working to keep children safe. All of our community believe that our setting should provide a caring, positive, safe and stimulating environment, which promotes the social, physical and moral development of the individual child. We promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities. All of our systems, processes and policies operate with the best interest of the child at their heart.

9. The academy trust will ensure that **all adults working or volunteering in our setting** have read part one of KCSIE 2026 and are aware of the requirements of Working Together to Safeguard Children.

10. All members of the academy trust and the Designated Safeguarding Lead (DSL),the deputy DSLs and the Designated Safeguarding Officers will read all parts of KCSIE and relevant parts of Working Together to Safeguard Children

11. The Academy Trust will ensure an appropriate senior member of staff, from the leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This is explicit in the role holder's job description. The designated safeguarding lead will have the appropriate status and authority within our setting to carry out the duties of the post.

12. The Academy Trust recognises the role of the designated safeguarding lead carries a significant level of responsibility, and they will be given the additional time, funding, training, resources and support they need to carry out the role effectively.

13. The DSL has additional responsibilities these include but are limited to, providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

14. The Academy Trust will work with headteachers to ensure there are robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. These cover arrangements will be made known to all adults working in our setting.

15. The Academy Trust will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of KCSIE.

16. Our policy and all supplementary policies and procedures are published on our website for all to view. This policy reflects the changes outlined in Annex F of Keeping Children Safe in Education 2026. It will be reviewed annually or as required and updated in line with any further statutory changes.

Part one: Safeguarding information:
A child centred and coordinated approach to safeguarding

17. All those who are part of our academy including our staff are an important part of the wider safeguarding system for our pupils.

18. All staff are aware of the requirements of KCSIE 2026 and have regard to the requirements set out in KCSIE and Working Together to Safeguard children

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

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

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

22. 'Children' includes everyone under the age of 18.

The role of our staff

23. Our staff will identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. They will provide a safe environment in which children can learn.

24. We are committed to identifying children who may benefit from family help. Family help means providing support as soon as a problem emerges at any point in a child's life, from foundation years through to teenage years.

25. The DSL and their deputy's role are to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise closely with other agencies including children's social care.

26. All staff are expected to support children's social care and other agencies following any referral made to them.

27. All teachers, including the headteacher/principal in accordance with the Teachers' Standards 2012 will safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties.

Staff training and induction

28. All staff will receive an induction, so they are aware of our safeguarding systems. This will include the child protection policy, child-on-child abuse policy and procedures, behaviour policy, staff behaviour policy, safeguarding response to children who are absent from education and role of the DSL and CSE lead (including the identity of the DSL and any deputies or DSOs). We will provide copies of policies and a copy of Part one or all of KCSIE 2026 to all staff at induction. We will maintain a record of training and policies provided to new staff during their induction.

29. Staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training will be refreshed every three years. All staff will also receive at least annual child protection and safeguarding updates (including online safety), to provide them with relevant skills and knowledge to safeguard children effectively. All staff will receive annual training in child sexual exploitation awareness. We will ensure staff safeguarding training is integrated, aligned and considered as part of our safeguarding approach and wider staff training and curriculum planning and training helps staff to understand local safeguarding procedures. We will maintain a record of training.

30. All staff will be made aware of Telford and Wrekin process for community-based Family Help assessments, the criteria, including the level of need, for when a case should be referred to Family Help support and services provided at: Targeted early help level (under sections 10 and 11 of the Children Act 2004), and Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children).

31. All staff are aware of the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for

statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm) including cases relating to the abuse, neglect, and exploitation of children.

32. All staff will be made aware of the following:
    - what to do if a child tells them he/she is being abused, exploited or neglected;
    - how to reassure victims they are being taken seriously and that they will be supported and kept safe;
    - that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful;
    - staff should be professionally curious and speak to the DSL or their deputies if they have concerns about a child, and
    - staff should build trusted relationships with children which facilitate communication.

33. We will encourage staff to consider the TWSP briefing on professional curiosity.

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

Family Help

35. Our family help offer is aligned with the expectations of Working Together to Safeguard Children 2026, ensuring that children and families receive the right support at the right time. We use the Telford & Wrekin Pathway to Support Guidance to inform our decisions and work collaboratively with partners to deliver integrated support through the Family First Partnership (FFP) programme. We believe that **any** child may benefit from community based or targeted family help, and we ensure that all staff are alert to the potential need for early help for a child who:

    - is disabled or has certain health conditions and has specific additional needs;
    - has special educational needs (whether or not they have a statutory Education, Health and Care Plan);

- has a mental health need
- is a young carer;
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from school or college and / or is in Alternative Provision or a Pupil Referral Unit;
- is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the day.

36. We ensure that all children that disclose that they have taken an overdose are referred to paramedics and/or go to the Emergency Department at the nearest hospital to be checked by a medical professional in line with the TWSP Procedure for the management of overdoses, involving children within schools and colleges. Parents/carers will be contacted at the earliest appropriate opportunity to support the child and facilitate ongoing medical care and continued follow up; however, where urgent medical attention is required, seeking treatment will not be delayed while awaiting parental contact.

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

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

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

39. Caring for someone can be very isolating, worrying and stressful for children. For young carers, this can negatively affect their experience in education. We recognise that many young carers will regularly miss school and that this can have a lasting effect on their life chances. Our aim is to work with families and other agencies to identify young carers to ensure that their needs are assessed and where necessary supported. We will work with the Telford and Wrekin Young Carers Service to do this.

Abuse, neglect and exploitation

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

41. We believe that abuse, neglect, exploitation and safeguarding issues are rarely stand-alone events. All staff, but especially the DSL and their deputies will consider whether children are at risk of abuse or exploitation in situations outside their

families. Extra-familiar harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

42. All staff are aware that technology is a significant component in many safeguarding and well-being issues. We understand children are at risk of abuse online as well as face-to-face. In many cases, abuse will take place concurrently via both online and offline.

43. All staff are aware that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

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

45. **Physical abuse**: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. The fabrication or induction of illness (FII) in children is a relatively rare form of child abuse. Where concerns exist about FII, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of

information'. We adopt the guidance Safeguarding children in whom illness is fabricated or induced and TWSP FII Best Practice Guidance.

46. **Emotional abuse**: Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

47. **Sexual abuse**: Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration whether that is with part of a person's body or object (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and understand our policy and procedures for dealing with it. Staff know there are specific offences for children under 13, who can never provide valid consent to sexual activity.

48. **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of

maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

49. **Exploitation:** Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into activity for the benefit of the perpetrator. Exploitation may occur online or offline and victims may not recognise that they are being exploited. Children who have been exploited may also be victims of modern slavery due to trafficking, servitude or exploitation. Exploitation may include any/ all categories of abuse – Physical, sexual, neglect, emotional abuse – It is important to recognise that children of any gender may be exploited either criminally or sexually or both.

Safeguarding issues

50. All staff are trained on safeguarding issues and are aware that safeguarding issues often overlap and can put children at risk of harm.

51. Staff are aware that the following behaviours and indicators can be signs that children are at risk of harm:
    - Drug taking and / or alcohol misuse
    - Unexplainable and / or persistent absences from education, home or care
    - Serious violence, criminal exploitation (including those linked to county lines), radicalisation and
    - Consensual and non-consensual sharing of nudes or semi-nudes.
52. Staff know there is further information contained in annex A KCSIE 2026 provides additional information on these safeguarding issues and other safeguarding issues.
53. All staff understand that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.
54. All staff recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate

Child-on-child abuse

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

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

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

58. All staff are expected to challenge inappropriate behaviours between peers, examples of which are listed below, that are actually abusive in nature. Staff recognise that downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Our procedures reflect the guidance in Part Five of KCSIE 2026, ensuring that all reports are taken seriously, victims are supported, and appropriate safeguarding and disciplinary actions are taken. We recognise that child-on-child abuse can occur in any setting and must never be tolerated or passed off as “banter” or “part of growing up.”

59. All staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. Staff understand the role they play in helping deter and prevent child-on child- abuse and in responding to reports of this happening.

60. Staff are aware that child-on-child abuse is most likely to include, but may not be limited to:
    - bullying (including cyberbullying, prejudice-based and discriminatory bullying);
    - discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents
    - abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’);
    - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an element of online which facilitates, threatens and/or encourages physical abuse);
    - serious physical assault and harm, or the threat of harm with a weapon,

- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing or making of nudes and semi nudes
- 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.

61. We will actively seek to raise awareness of and prevent all forms of child-on-child abuse by:

- educating all governors/Trustees, our senior leadership team, staff, students, and parents about this issue;
- educating children about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via the curriculum;
- engaging parents on these issues;
- supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs;
- working with governors/Trustees, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community;
- creating conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole-school culture;
- responding to cases of child-on-child abuse promptly and appropriately; and

- ensuring that all child-on-child abuse issues are fed back to the DSL and deputies so that they can spot and address any concerning trends and identify students who may be in need of additional support.

62. We will actively engage with TWSP in relation to child-on-child abuse, and work closely with, for example, children's social care, the police and other education settings. The relationships our setting has built with these partners is essential to ensuring that we are able to prevent, identify early, and appropriately handle cases of child-on-child abuse. The DSL (or a deputy) will regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

63. We recognise that any child can be vulnerable to child-on-child abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse among all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. We know that research suggests:
    - child-on-child abuse may affect boys differently from girls (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously;
    - children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and
    - some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

Child-on-child sexual violence and sexual harassment

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

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

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

67. We will work to ensure our whole-school community are aware of the importance of:

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

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

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

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

71. We will try to be aware of, and respond appropriately to **all reports and concerns**, including those outside of our setting, and or online.

72. While the focus of this policy is on protecting and supporting children, we will of course protect any adults and engage with adult social care, support services and the police as required.

Tackling Violence Against Women and Girls (VAWG)

73. We are committed to the principles of the Government's Violence Against Women and Girls Strategy, *Freedom from Violence and Abuse (2025),* which prioritises early intervention, prevention, relentless pursuit of perpetrators, and support for victims and survivors and is available here.

74. We recognise that girls are disproportionately affected by sexual violence, harassment, and abuse, and that these harms can intersect with other vulnerabilities such as race, disability, and social disadvantage.

75. Our approach is trauma-informed, victim-centred, and rooted in early intervention. We will challenge all forms of gender-based violence, educate pupils on consent and respect, and work with partners to disrupt harmful behaviour and protect those at risk.

76. We will align our work with local and national approaches to tackling Violence Against Women and Girls (VAWG). Safeguarding leaders will regularly review local strategic priorities, partnership learning, domestic homicide reviews, child safeguarding practice reviews and local needs assessments to ensure our curriculum, policies and safeguarding arrangements remain responsive to emerging risks.

77. One of the priority commitments in the Telford & Wrekin Partnership Domestic Abuse and VAWG Strategy 2026-2028, available here is to "Educate young people about sexual exploitation, sexual violence and unhealthy relationships, challenging attitudes that enable abuse"

Sexual violence

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

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

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

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

    Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing

someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

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

80. Sexual consent:

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

Sexual harassment

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

82. While not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes;
- displaying pictures, photos or drawings of a sexual nature,
- upskirting, and
- on-line sexual harassment.

83. We will follow the guidance set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Upskirting

84. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. We recognise 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or

buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Harmful sexual behaviour

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

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

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

Tackling Discrimination

88. We recognise that discrimination can have a significant impact on children's welfare and outcomes. We are committed to anti-racist and anti-discriminatory safeguarding practice and actively challenge discrimination, prejudice and stereotyping. When making safeguarding decisions, we consider whether cultural assumptions, unconscious bias or discrimination have influenced professional judgement and ensure that all children receive equitable access to support and protection.

Hate crime

89. A hate crime, or hate incident, is an act motivated by, or perceived to be motivated by, prejudice against who the victim is, or what they appear to be, in relation to their race, religion, sexual orientation, gender identity, or disability. These are known as protected characteristics. It does not matter if the person targeted has the characteristic that the prejudice is directed toward. Only that they are perceived to have that characteristic or belong to that community.

90. A hate crime does not have to amount to a criminal offence to be considered a hate crime. Non-criminal hate crime incidents can still be reported to the police to

be recorded. Evidence of a hate crime is not required – it is enough that one person, such as the victim or a witness, perceives the incident to be a hate crime.

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

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

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

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

Racist incidents

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

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

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

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

98. All racist incidents reported in our setting must be recorded.

99. Telford and Wrekin Council require all schools and colleges to report racist incidents on an individual and annual return, Racist Incident Reporting and Recording System (IRIS). The reporting of incidents should take place within seven days of the incident being reported or as soon as reasonably practicable. The DSL

will regularly review this data to identify emerging themes and inform preventative and responsive work around racist incidents.

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

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

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

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

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

104. As part of our commitment to our pupils, we have identified the following Designated Safeguarding Officers (DSOs), who are not part of our setting's senior leadership team, as staff in our setting, pupils can report child-on-child abuse to, if they choose not to report directly to a member of the senior leadership team.

Jacqueline Massey
Steve Parish
David Tonks
Ben Whittaker
Clare Tabberer
David Smith

Pupils may also choose to report child-on-child abuse to their year team who have a similar level of safeguarding training.

	Year 7	Year 8	Year 9	Year 10	Year 11
Head of Year	Rebecca Nathan	Jodie Wilkinson	Kate Chappell & Andy Mottram	Rob Porter	Clare Tabberer

Assistant Head of Year	Steve Parish	Leah Powell	Luke Shepherd	Erin Buckley	Gemma McKeown

105. All staff in our setting will undertake training in how to respond to child-on-child abuse, including reports of sexual violence or sexual harassment. Our DSL will undertake training to manage a report.

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

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

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

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

109. Where necessary we will work with other professionals, agencies and partners in our response. This may include the TWSP partners, the relevant local authority children's social care departments, the police and other services.

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

The immediate response to a report

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

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

Risk assessment and safety planning & support

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

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

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

116. Our risk and needs assessment will consider:

- the victim, especially their protection and support;
- whether there may have been other victims;
- the alleged perpetrator(s);
- all the other children, (and, if appropriate, adult students and staff) at the school especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and

- the time and location of the incident, and any action required to make the location safer.

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

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

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

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

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

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with our duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?

- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult students or school staff; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

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

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

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

Options to manage the report

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

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

126. The DSL (or a deputy) will use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. The DSL and their deputies will consult the relevant local partnership threshold guidance to support their decision making and will engage in discussions with the statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, part of the local arrangements.

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

128. Where the DSL (or a deputy) considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL (or a deputy) will contact Family Connect or the local social care team for the child and/or the police immediately and, in any event, within 24 hours of the DSL (or a deputy) becoming aware of the alleged behaviour. The DSL (or a deputy) will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

    1. manage internally;
    2. family help;
    3. referral to children's social care; and
    4. reporting to the police.

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

129. **All** concerns, discussions, decisions, and reasons for decisions will be recorded (written or electronic).

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

131. There may be delays in any case that is being progressed through the criminal justice system. We will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children and adult students in the school. The DSL (or a deputy) will work closely with the police (and other agencies as required), to ensure any actions we take do not jeopardise the police investigation.

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

133. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Family Connect or the relevant children's social care team may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our own behaviour policy.

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

134. We will consider the principles based on effective safeguarding practice and to help shape any decisions regarding safeguarding and supporting the victim and the alleged perpetrator(s). We will consider what support is the most appropriate to support all children involved.

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

136. A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. We will avoid any action that would have the effect of isolating the victim, from supportive peer groups, there may be

times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This will be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

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

138. Please refer to our policy and procedures with regard to child-on-child abuse.

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

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

140. We recognise that exploitation exists on a continuum of need. Concerns may present as vulnerable, complex or acute within the Telford & Wrekin Pathway to Support. Early identification, information sharing, timely intervention and effective multi-agency working are essential to preventing escalation and safeguarding children from harm

141. We recognise both CSE and CCE are forms of abuse. They both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. It may involve being in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

142. CSE and CCE can affect children, both male and female and can include children who have been moved for the purpose of exploitation. Information on CCE definition can be found on p.48 of Home Office's Serious Violence Strategy.

143. We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

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

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

Indicators of Exploitation

146. Staff recognise that children who are being sexually or criminally exploited may not always identify themselves as victims and that indicators can often be mistaken for typical adolescent behaviour. Staff will exercise professional curiosity and consider the wider context of any concerns. Indicators may include-

- unexplained gifts, money, clothing, phones or other possessions;
- changes in school attendance, behaviour or presentation;
- unexplained absences or missing episodes;
- being picked up by unknown adults or vehicles;
- concerning online activity or excessive use of phones and social media;
- new or older friendship groups;
- withdrawal from family, friends or previously enjoyed activities;
- injuries, marks, tattoos or unexplained physical harm;
- substance misuse;
- sexual health concerns;
- deterioration in emotional wellbeing, including self-harm or suicidal ideation;

- involvement in anti-social or criminal behaviour; possession of weapons;
- expressions of fear, control, secrecy or dependency within relationships.

Staff will consider these indicators alongside other safeguarding information and, where exploitation is suspected, will follow the Telford & Wrekin Child Abused Through Exploitation (CATE) pathway, utilise the Pathway to Support Guidance, and seek advice from Family Connect, the CATE Team and other relevant safeguarding partners as appropriate

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

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

149. If we feel that children may be being abused through exploitation, we will follow the Telford & Wrekin Council exploitation care and support pathway. We will always consider the Telford & Wrekin Council, 'explore more' document to support us in working with children and young people to understand what sort of matters may indicate that a child or young person is being sexually exploited. We will consult in the normal way with the relevant local authority children's services team to seek advice through consultation. The concerns will be followed through sensitively and appropriately with fellow professionals and the appropriate referral form will be completed. In relation to the CATE Risk Panels, where concerns are expressed around a child attending our setting, we will ensure attendance whenever possible as part of the established multi-agency process. Alongside this, we have taken the same steps and made all staff aware of the TWSP, 'A guide for professionals CATE leaflet.'

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

151. We will take a proactive approach to minimising the risk of all types of exploitation. We will engage with lived experience work to benefit the whole

academy community, including staff, children and parents. All staff will receive training and updates on child exploitation.

152. Our curriculum includes a programme of age and stage appropriate exploitation awareness, especially CSE raising awareness.

153. The Headteacher and DSL or a deputy DSL will exchange any relevant information with local partners in relation to exploitation as required to enable all professionals to react, monitor and protect children. As a secondary school the CSE DSL attends the CSE DSL network.

154. As a secondary school the DSL will work with one of their deputies/CSE DSL to focus on child exploitation, especially CSE and provide any required information to partners. The CSE DSL will be known to parents and children. We will ensure the CSE DSL is accessible to children.

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

156. We will carry out an annual review to consider the adequacy of our site security provision, including monitoring and recording any unauthorised access to our site, to ensure that our pupils are protected from potential perpetrators of child exploitation, especially CSE while at school. Any concerns will be shared as required with the police and/or Family Connect. Our site security audit findings will be used to update and review our site security risk assessment. We are committed to involving parents in the annual review of our site security arrangements.

157. Any breaches or near misses in relation to site security will be notified to our respective Health and Safety Provider and educationsafeguarding@telford.gov.uk will be updated on any such incidents.

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

159. We will use the Telford & Wrekin Partnership Pathway to Support Guidance, this includes the Child Exploitation Risk Threshold Indicator and 'explore more' document to identify the care and support needs of children involved in exploitation. Where care and support needs are identified as 'vulnerable,' 'complex' or 'acute,' we will refer to Family Connect. We will complete the West Mercia Police Protected Partner Intel form to share any relevant exploitation intelligence; this will be emailed to protect@westmercia.pnn.police.uk. In emergencies we will report

information to the police via 999 for non-emergencies we will report information to the police via 101 or contactus@westmercia.police.uk

Child Criminal Exploitation (CCE)

160. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

161. We recognise that this type of exploitation can trap children as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. We ensure that children who are criminally exploited have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. We recognise that it is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them. We are aware that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, we are aware that girls are a risk of being criminally exploited too. We recognise that both girls and boys being criminally exploited may be at a higher risk of sexual exploitation

Child Sexual Exploitation (CSE)

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

163. We recognise that CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such

as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. We know that CSE can occur over time or be a cone-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

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

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

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

166. Staff are aware that CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17- year olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

167. As with CCE, we recognise that victims of CCE are not always recognised and may be criminalised for actions undertaken whilst under coercion. We recognise that children are often manipulated, groomed and exploited without understanding the abuse they are experiencing. All professionals working within our setting understand the indicators and seriousness of CSE and CCE and will act to ensure children receive appropriate support and protection.

168. We recognise that group-based CSE is a distinct and serious form of abuse, often involving multiple perpetrators and complex grooming tactics. In line with the National Audit on Group-Based Child Sexual Exploitation and Abuse (2025), we are committed to identifying and responding to this form of exploitation with urgency and professionalism.

169. Our staff are trained to take disclosures seriously, act without delay, and challenge any culture of silence or inaction. We will not allow fear of being perceived as culturally insensitive to prevent us from protecting children. Safeguarding is paramount, and we will act on concerns regardless of the background of those involved.

170. Our response to CSE is trauma-informed, victim-centred, and includes long-term support for survivors. We work closely with local partners, including the police, social care, and specialist services, to disrupt exploitation and safeguard children.

County lines

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

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

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

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

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

- have their bank accounts used to facilitate drug dealing.

175. We will make the Home Office guidance on the signs of a child's involvement in county lines available to staff.

176. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral will also be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Modern Slavery and the National Referral Mechanism (NRM)

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

178. We know that information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. All concerns about child exploitation will be referred to the front door of children's services where consideration of the referral to NRM will be made where concerns indicate the chid may be a victim of modern slavery through exploitation.

Serious violence

179. All staff are aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We recognise that the likelihood of involvement in serious violence may be increased by factors, such as being male, having been frequently absent or permanently excluded from school and having experienced child maltreatment and having been involved in offending. Staff are aware of the associated risks and understand the measures in place to manage these.

180. We will consider the risk in the hours just before or just after school, when pupils are travelling to and from school/college is when violence can often peak, and these times can be particularly risky for young people involved in serious violence.

181. We will follow the advice provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance.

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

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

183. In order to tackle violence affecting our setting and the community, we know it is important to understand the problems that young people are facing both in our setting and in their local community; considering possible avenues of support; and work with local partners who may have valuable information, resources or expertise.

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

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

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

187. Any disclosure, suspicion or intelligence relating to weapon carrying, access to weapons, threats involving weapons or planned violence will be treated as a safeguarding concern and immediately referred to the DSL.

Child abduction and community safety incidents

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

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

190. As children get older and are granted more independence (for example, as they start walking to school on their own) we will give them practical advice on how to keep themselves safe. This may include outdoor-safety lessons run by teachers or other professionals. We will aim to build on building children's confidence and abilities rather than simply warning them about all strangers.

Children and the court system

191. We recognise that sometimes children are required to give evidence in criminal courts, for crimes committed against them or for other crimes they have witnessed. We will signpost them to the guides for young people.

192. We will follow these guides to ensure the correct process is followed and support and special measures are made available.

193. We understand that when child arrangements via the family courts are made following separation, this can be stressful time and entrench conflict in families and this can be stressful for children. We will follow the guidance of the Ministry of Justice in managing these situations.

Children with family members in prison

194. We recognise that children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will use the information from NICCO, to help mitigate negative consequences for those children.

Cybercrime

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

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

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

197. If there are concerns about a child in this area, the DSL (or a deputy), will consider referring into the Cyber Choices / Cyber Sprinters programme.

Parent conflict

198. We are committed to helping families to communicate better. We know that relationships are key and positive communication is what we want to see.

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

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

201. We will work with families using solution focused ways to guide people towards working out what better, looks like for them. We understand this is a more effective strategy than offering our own advice and solutions. When supporting families with struggling relationships we will consider the following:

- don't assume you know what is going on, explore both parties' thoughts and feelings;
- be curious, what is really going on?;
- encourage a culture of appreciation between the people you are supporting. Kindness wins over blame every time;

- Remember that not everyone feels able to change, all we can do is offer support, but someone needs to want things to be different in order to make change happen, and
- It's normal to feel uncomfortable sometimes talking to someone about their relationship, we will not try to fix things or give advice but instead ask thoughtful, open questions.

Domestic abuse

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

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

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

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

206. We will always liaise with agencies in a two-way process where domestic abuse is a factor in a household. Children within our care will be supported where needed. We are part of the Operation Encompass process where domestic incidents are shared directly with us, so that we have an initial awareness. To this end, we will

be part of any agency referral, in a two-way process, such as the Domestic Violence Multi-agency Risk Assessment Conference (MARAC), the Domestic Abuse Perpetrator Programme (DAPP) and any Multi Agency Public Protection Arrangements (MAPPA) or any other named agencies where these specific issues are a factor that may impair and impact on children's development.

207. We will refer to the guidance from TWSP Telford and Wrekin Safeguarding Partnership | Impact of Domestic Abuse on Children and Young People

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

209. We will use the following additional advice on identifying children who are affected by domestic abuse and how they can be helped:
    - NSPCC- UK domestic-abuse Signs Symptoms Effects
    - Refuge what is domestic violence/effects of domestic violence on children
    - SafeLives: young people and domestic abuse
    - Domestic abuse: specialist sources of support
    - Home : Operation Encompass

Homelessness

210. We understand that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and deputies) are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. As appropriate, we will make referrals and/or hold discussions with the Local Housing Authority. However, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

211. We will consider homelessness in the context of children who live with their families, and intervention will be on that basis.

212. We recognise in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. In these cases, we will follow the department and the Ministry of Housing, Communities and Local Government joint

statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

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

213. We recognise that Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. Staff are aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. Staff are aware that all forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

214. If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy).

215. The designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

Female Genital Mutilation (FGM)

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

217. We will follow the National FGM Centre Female Genital Mutilation: Guidance for schools.

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

219. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the schools designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate.

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

Forced marriage

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

222. We will follow the Forced Marriage Unit published statutory guidance and Multi-agency guidelines. Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email fmu@fco.gov.uk

Preventing radicalisation

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

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

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

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

The Prevent duty

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

227. We see The Prevent duty as part of our wider safeguarding obligation. Our DSL and deputies and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210.

228. We will follow the published advice for schools on the Prevent duty.

229. We aim to ensure all staff have completed training on the Prevent duty.

230. This policy reflects the Prevent Duty Guidance for England and Wales (2023), which came into force on 31 December 2023. We recognise our statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism."

231. We adopt a whole-setting approach to Prevent, ensuring that all staff are trained to identify signs of radicalisation and extremism, understand the referral process, and know how to respond proportionately. Our DSL and senior leaders are familiar with the 2023 guidance, including the revised definitions of extremism and terrorism, and the expectations for risk assessment, partnership working, and information sharing.

232. We work in close partnership with the local authority, police, and Channel Panel, and follow the local Prevent referral pathway. Our curriculum promotes fundamental British values and resilience to extremist narratives. We also ensure that our filtering and monitoring systems are reviewed annually and are proportionate to the risks identified in our Prevent risk assessment.

Channel

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

234. We will follow the Channel guidance.

235. If we feel children are being abused through extremism or being radicalised, we will consult directly with the local police Counter Terrorism Unit (CTU). This is done with a National Prevent referral form, following the Prevent flowchart contained in annex 1. The referral will be sent to the police.

236. As with all referrals, this referral will be dealt with appropriately with professionals. If it is deemed from the Prevent team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently that is **Jas Bedesha,** jas.bedesha@telford.gov.uk. The education lead for Telford & Wrekin Council is **Joanne Hanslip**, joanne.hanslip@telford.gov.uk. Where necessary, the DSL (or a deputy) will consult with the Telford and Wrekin professional lead, education lead or CTU officers: Alison Potts, a.potts@west-midlands.pnn.police.uk, or Holly Aungiers, holly.aungiers@westmercia.police.uk, to seek advice on making prevent referrals.

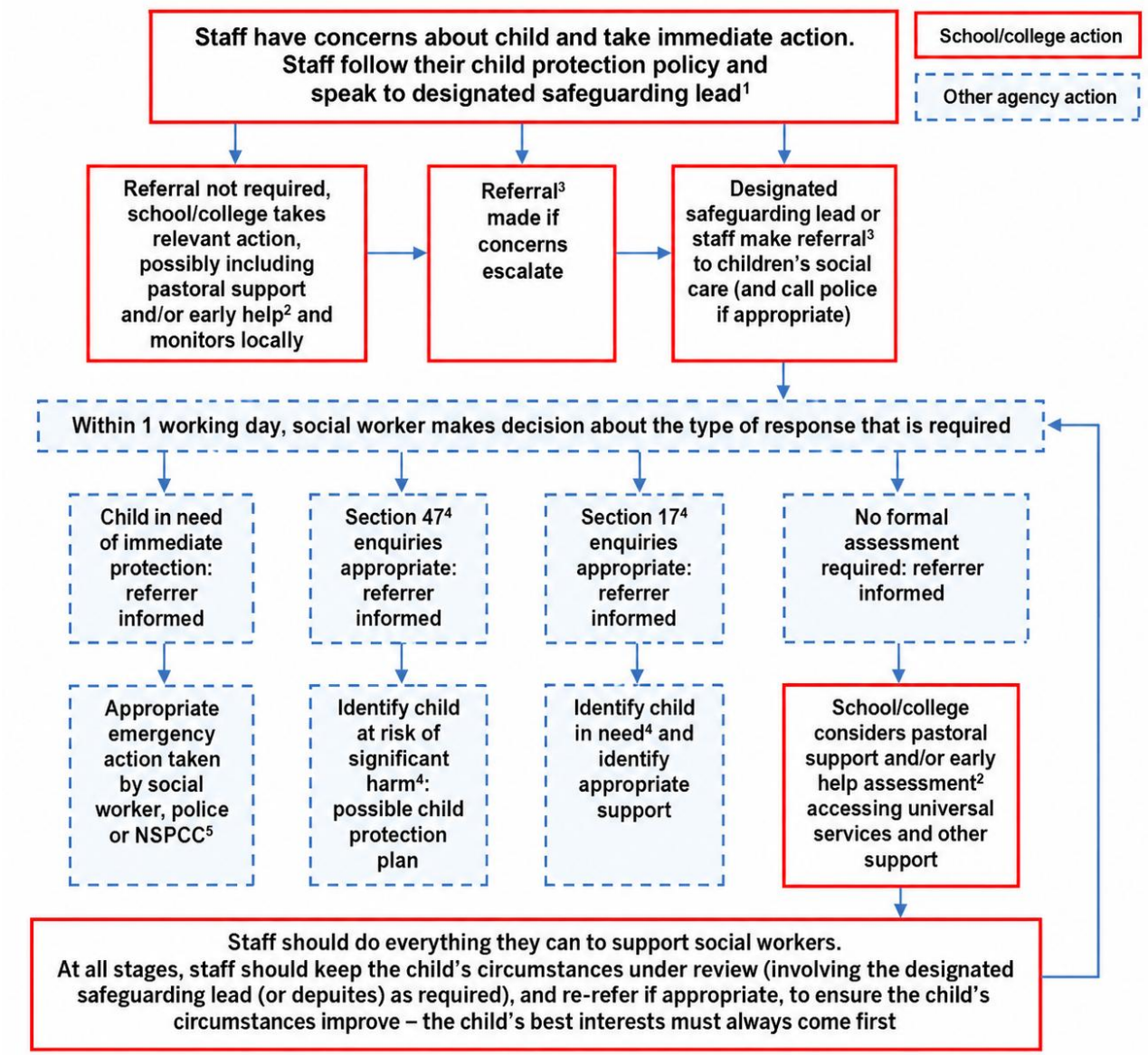
237. Family Connect (MASH) will discuss with Police HAU to support the completion of a risk assessment at the earliest opportunity.

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

What to do if you have concerns about the safety or welfare of a child

239. Staff working in our setting maintain the attitude of **'it could happen here'** where safeguarding is concerned and will always act in the **best interests** of the child.

240. If staff have **any concerns** about a child's welfare, they must act on them **immediately**. The following flow chart sets out the process for staff when they have concerns about a child.



241. Where someone has a concern about the welfare of a child, they should speak to the DSL (or a deputy). Options will then include;
    - managing any support for the child internally via our own pastoral support processes;
    - providing early help support and/or undertaking an early help assessment; or
    - making a referral to statutory services, for example, as the child is in need or suffering or likely to suffer significant harm or impairment. This will involve contacting Family Connect or the local social care team for the child. When making a referral to children's social care staff will ensure they are aware of the child's history, such as any previous concerns about the child or their family, so that they can share this information with children's social care staff.
242. The law does not say an age when parents can leave a child on their own, but it is an offence to leave a child alone if it places them at risk. The NSPCC says:

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

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

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

245. All referrals to the local social team must be followed up in writing using the social care team's relevant referral/request forms. For referrals in Telford & Wrekin we will use the request for service form Concerned about the welfare of a child - Online form - Telford & Wrekin Council

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

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

248. In the unlikely event of a person in our academy who has a concern for a child is not satisfied with the action taken by the DSL or a deputy they should speak to them again to share their concerns. If they remain unsatisfied with the response, then the person who had the original concern should speak to another trained DSL to seek resolution. If following speaking to another trained DSL the person remains concerned that appropriate action has not been taken to safeguarding or protect the child, the person should report their original concern to Family Connect or the local social care team for the child and follow the school Whistleblowing procedures.

Referral agencies

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

Immediate response to a child or parent

249. Staff will follow effective safeguarding practice which includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this is not always possible;
- where the report includes an online element, we will be aware of searching, screening and confiscation advice (for schools) and UKCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff will only share the report with those people

who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

- recognising a child is likely to disclose to someone they trust: this could be **anyone** in our setting. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc or TED 'tell me', 'explain to me' and 'describe.' It is important to note that while leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a first-handwritten record is made**;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. We are aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the DSL (or a deputy), as soon as practically possible, if the DSL (or a deputy) is not involved in the initial report.

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

251. We will never allow fears about sharing information to stand in the way of the need to promote the welfare and protect the safety of children. We expect **concerns that arise in a morning will be reported to the DSL (or a deputy) by lunchtime that day**. **Concerns that arise in an afternoon should be reported by or as close to the end of the academy day, or as soon as reasonably practicable**. Any

concerns arising outside of the normal academy day should be reported as quickly as possible. If in doubt concerned, parties should talk with the DSL (or a deputy). **Delay is unacceptable and may result in disciplinary action**.

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

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

254. Our role is to refer the information received and **under no circumstances** become the investigator. We will work appropriately with each child, their family and other agencies to protect in all cases the welfare of the child. We will work in partnership and fulfil the ethos and abide by the principles of the TWSP Pathway to support guidance. telford-wrekin-pathway-to-support-2026.pdf

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

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

257. A **child in need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

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

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

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

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

The role of the local authority

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

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

263. The referrer will, even if they are not the DSL (or a deputy), follow up if this information if it is not forthcoming.

264. If, after a referral, including where there are concerns for CCE or CSE, the child's situation does not appear to be improving, we will consider following TWSP local escalation procedures or those for the safeguarding partnership for the child to ensure our concerns have been addressed and, most importantly, that the child's situation improves.

265. The Telford & Wrekin Council Director of Children's Services is **Jo Britton**.

Record keeping and the use of CPOMs

266. Staff are expected to record and report all safeguarding concerns using CPOMs (Child Protection Online Management System) immediately or as soon as reasonably practicable following a disclosure, incident or concern.

267. Staff are expected to:

- Record concerns factually and objectively.
- Record the child's own words wherever possible.
- Distinguish between fact, opinion and professional judgement.
- Inform the DSL or a deputy on the same working day.
- Upload supporting documentation where appropriate.

268. The DSL and deputies regularly review safeguarding records to identify patterns, emerging themes and children requiring additional support.

269. **All** concerns will be recorded first hand by the person raising the concern, using the "Cause for Concern form" or CPOMs, used by visitors, staff and supply staff. Concerns will be passed onto the DSL or a Deputy DSL in a timely manner. DSLs will record in writing any discussions and decisions made, and the reasons for those decisions, Information will be kept confidential and stored securely. We will keep concerns and referrals in a separate child protection file for each child.

270. Records should include:

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

271. We follow the guidance in KCSIE 2026 regarding the secure transfer, retention, and review of child protection records. All safeguarding records are reviewed annually and transferred securely when a child moves to another setting.

272. If in doubt about recording requirements, visitors, staff and supply staff will discuss with DSL (or a deputy).

273. Anyone who has a safeguarding concern should follow these recording principles:

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

274. Visitors, staff and supply staff note down concerns on a Cause for Concern form available from reception. The visitor or supply member of staff should inform the DSL (or a deputy) as soon as their concern arises. Once completed, they should hand the Cause for Concern form to the DSL (or a deputy). All Cause for Concern forms will be uploaded directly to CPOMS/placed into the child's safeguarding record to help to maintain a first-hand record.

275. This school has adopted an electronically maintained recording system called Child Protection Online Management System (CPOMS). The CPOMS system is a totally secure system of record keeping which enables us to quickly encapsulate a child journey with us.

276. The DSL and deputies record all concerns on CPOMS. We will ensure that a restricted number of staff will have full access to this system as named key holders. If concerns have been logged by staff via this process it should not be presumed that this is an instant notification that has been seen immediately. If appropriate the issue should not assume anything and a verbal conversation should also take place if needed for clarification.

277. Concerns are stored chronologically in a safeguarding file/electronically for that child.

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

278. If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children, then:
    - this should be referred to the Headteacher/Principal;
    - where there are concerns/allegations about the Headteacher/principal, this should be referred to the chair of governors

279. Any concerns about staff must be recorded on CPOMS staff safe/low-level concern recording form and referred to the relevant person above.

280. Any allegations that may meet the harms threshold will be addressed as set out in Part four, section one, of KCSIE 2026. Any concerns that do not meet the harm threshold, referred to, as 'low level concerns' will be addressed as in Part four, Section two of KCSIE. When an allegation is made, the DSL will be responsible for ensuring that a child is not at risk and refer cases of suspected abuse to Family Connect or the child's local social care team.

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

282. **The LADO** will be informed of all allegations that come to our attention and appear to the meet the criteria set out in Part Four, Section One of KCSIE, so they can consult police and children's social care services as appropriate. All LADO referrals must be made via Family Connect, unless the subject child is open to a social worker and then the LADO referral must be made via the child's allocated social worker.

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

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

285. We believe that those who work within our community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE a separate code of conduct policy will be adopted by this setting for staff, volunteers, contractors and governors.

286. Guidance for safer working practice for those working with children and young people in educational settings produced by the Safer Recruitment Consortium, provides excellent guidance on the expected standards of all those that work with children. We will make all those in our community aware of its existence and this will work alongside the separate code of conduct mentioned above and any established human resources processes currently in place.

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

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

What to do if you are concerned about another safeguarding practice in New Road Academy

289. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and know that such concerns will be taken seriously by our senior leadership team.

290. Please refer to our Whistleblowing procedures.

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

Part two: The management of safeguarding

292. The **designated trustee** with responsibility for safeguarding and 'Prevent' is **Christine Davies**. Their roles are to take **leadership** responsibility for our safeguarding arrangements.

293. The **designated governor** with responsibility for safeguarding is **Sue Wright**. The **designated governor** with responsibility for 'Prevent' is also **Sue Wright**. Their roles are to take **leadership** responsibility for our safeguarding arrangements.

294. Our academy trust safeguarding lead is **Maddie Griffin** they provide strategic support and oversight to our DSL.

295. The trustees and governing body will ensure the DSL is afforded sufficient time, funding, training, resources and support to undertake the role effectively.

296. The trustees and governing body have strategic leadership responsibility for our safeguarding arrangements and **must** ensure that we comply with their duties under legislation. They **must** have regard to KCSIE, ensuring our policies, procedures and training in our setting are effective and comply with the law at all times.

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

298. The governing body will work with the DSL and leaders to assure themselves of

- SCR compliance
- filtering and monitoring review
- safeguarding audit findings
- attendance and absence data
- child-on-child abuse trends
- staff training compliance
- Family Help activity;
- exploitation referrals;
- children with social workers;
- attendance of vulnerable cohorts;

- outcomes from safeguarding supervision

299. The trustees and governing body recognises that effective safeguarding requires active oversight, challenge and assurance. Safeguarding is a standing item within trustee and governance arrangements and trustees and governors receive regular safeguarding information, reports and updates to enable them to fulfil their statutory responsibilities.
    - Trustees and governors will seek assurance regarding the effectiveness of safeguarding arrangements through:
    - safeguarding link trustee and governor visits and reports;
    - review of safeguarding audits, external reviews and action plans;
    - scrutiny of child protection and safeguarding data and trends;
    - oversight of attendance, persistent absence and severe absence data;
    - review of children with social workers, looked after children, previously looked after children and other vulnerable groups;
    - monitoring incidents of child-on-child abuse, sexual harassment, hate incidents and discriminatory behaviour;
    - review of filtering and monitoring arrangements and online safety provision;
    - scrutiny of the single central record and safer recruitment practice;
    - monitoring staff safeguarding training compliance and induction processes;
    - review of safeguarding supervision arrangements;
    - pupil voice, parent voice and staff voice activities;
    - assurance regarding Family Help, child protection and multi-agency working arrangements; and
    - review of safeguarding concerns, themes, patterns and lessons learned.

300. Trustees and governors will provide strategic challenge and support to leaders, ensuring that safeguarding arrangements are effective, compliant with statutory guidance and responsive to the needs of pupils. Where weaknesses are identified, governors will ensure that appropriate action plans are implemented, monitored and reviewed.

301. An annual safeguarding report will be presented to governors and trustees to enable them to evaluate the effectiveness of safeguarding arrangements, monitor progress against safeguarding priorities and identify areas for further development.

302. We have charitable status and follow the Charity Commission guidance on charity and trustee duties to safeguard children.

303. Our Headteacher/Principal will ensure that the policies and procedures, adopted by our governing body, are understood, and followed by all staff.

304. All trustees and governors have received appropriate safeguarding and child protection training (including online safety) training at induction. This will ensure they have the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies in our setting are effective and support the delivery of a robust whole-setting approach to safeguarding. This training will be updated annually.

305. The trustees and governing body will act under their obligations under the Data Protection Act 2018 and the UK GDPR, Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Our approach to safeguarding

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

307. Where there is a safeguarding concern, our trustees and governing body and our senior leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they will be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. We will work with children to remove any barriers to reporting.

308. We will facilitate staff to contribute to and shape our safeguarding arrangements and Child Protection and Safeguarding policy.

309. We will ensure that suitable arrangements are in place to provide access for all staff to access safeguarding supervision. Please see our Safeguarding Supervision policy.

Policies and procedures

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

The designated safeguarding lead (DSL)

311. Our governing body has appointed **Heather Murphy** to be the DSL of this academy and **Letitia Suarez** to be the deputy. We will set out their responsibilities in their job description.

312. **Heather Murphy** will take ultimate responsibility for safeguarding and child protection, online safety, and understanding the filtering and monitoring systems and processes in place at our setting as the DSL and as an appropriate **senior member** of staff from our **leadership team**.

313. The DSL will fulfil the responsibilities outlined within Annex B of KCSIE 2026, including responsibility for understanding the school's filtering and monitoring arrangements and supporting staff with safeguarding concerns

314. During term time, the DSL and/or a deputy will always be available (during our normal operating hours) for the staff to discuss any safeguarding concerns with. During out of hours/out of term activities we will provide appropriate cover by ensuring the DSL and/or a deputy is available.

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

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

317. The DSL will form part of a borough wide network, where information is shared, in a two-way process, with the Telford & Wrekin Council, Education Safeguarding Team. The DSL maintains an up-to-date knowledge of local learning published by

the TWSP and disseminates this learning to staff, leaders and governance as appropriate.

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

Multi-agency working

319. The DSL and any deputies will work with other agencies in line with Working Together to Safeguard Children 2026. We are committed to embedding the national multi-agency child protection standards. These standards guide our practice in identifying, assessing, and responding to safeguarding concerns, and ensure that our work with partners is timely, proportionate, and focused on improving outcomes for children.

320. Where appropriate, the DSL will maintain effective links with the Education Family First Partnership Lead - Mr Joedy Parton - educationffpp@telford.gov.uk and work with any other Family Help professionals to ensure children and families receive coordinated support. The school will contribute fully to Family Help assessments, Team Around the Family arrangements, Family Group Decision Making and Multi-Agency Child Protection Team activity where appropriate.

321. We support the Families First reforms and will engage constructively with Family Help arrangements and Multi-Agency Child Protection Teams (MACPTs). We will contribute fully to multi-agency assessments, planning, information sharing and child protection activity to ensure children receive coordinated support and protection.

322. We will work proactively with MACPTs, contributing information, attending meetings and supporting multi-agency planning where children are subject to statutory child protection intervention.

323. We will contribute fully to strategy discussions, child protection enquiries, initial child protection conferences, review conferences, core groups and child protection plans.

324. The child's lived experience will be central to all safeguarding decision making and assessment. The views, wishes, feelings and daily experiences of children will be actively sought, recorded, analysed and used to inform support and protection plans.

325. We will support Family Network approaches and Family Group Decision Making processes to help identify strengths within the wider family and support sustainable safeguarding plans.

326. Our trustees and governing body and the DSL are familiar with the TWSP and Shropshire arrangements. In Telford & Wrekin, schools and colleges have been named as relevant agencies by the TWSP. We will engage with the TWSP and Shropshire safeguarding partnership as required and follow the relevant Pathway to Support Guidance or the appropriate Safeguarding partnership guidance for where the child resides or for who is responsible for the child, to follow their local protocol for assessments.

327. When assessing levels of need, we utilise the Telford & Wrekin Pathway to Support and consider whether a child's circumstances meet Universal, Vulnerable, Complex or Acute levels of need.

328. The governing body of this setting expect staff to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will never restrict access for children's social care to conduct a section 17 or section 47 assessment.

329. We recognise that harm may occur in extra-familial contexts including school, neighbourhoods, peer groups, online environments and public spaces. Safeguarding assessments will consider these contexts alongside family circumstances.

330. The DSL is expected to consider the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

Information sharing

331. Fear about sharing information must never stand in the way of safeguarding and promoting the welfare of children.

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

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

assess and respond to risks or concerns about the safety and welfare of children in the same family.

334. All child protection records are clearly marked as such and are kept securely locked on the premises and/or within CPOMS, the nominated persons are responsible, accountable, documented and are identifiable within our setting for total security. Also, procedures are in place when a member of staff leaves the setting or is on long term sick leave for their access to cease. Withdrawal of child protection records from our setting by staff will be noted and signed for, as will files released to professionals.

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

336. Pupil record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidently.

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

338. We will also seek advice and adopt the Information sharing advice for safeguarding practitioners. If in any doubt we will seek advice from **Simon Badley** our **Data Protection Officer who is the Head of IT and Data (datasupport@lct.education).** Upon releasing records, the academy will request ID Badges for release. If the Police are only after minimal data e.g., address or phone number, we will ensure we check the police ID and we will record what information was asked for and the name of the police officer requesting it. A permission form may not be required on these occasions.

339. No named statistics in relation to child protection are an important part of performance information. These may be shared by the DSL with staff, other agencies or the governing body/proprietor/management committee.

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

- Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing;

- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful;
- The Information Commissioner's Office which includes ICO GDPR FAQs and guidance from the department; and
- Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.

341. When a child leaves the academy, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible (within five working days of the child starting at their new school or college), ensuring secure transit, and confirmation of receipt will be obtained. We will transfer the child protection file separately from the main pupil file. As a receiving school we will ensure key staff such as DSL's and SENDCO's, are aware as required. On receiving the child protection and safeguarding record for each child a DSL or a deputy will ensure a note is entered on to the child's child protection and safeguarding record and summarise any concerns from the information they have received.

342. In addition to the child protection file. The DSL will share any relevant safeguarding information with the new school or college in advance of a child leaving, including where a child has been or is open to 'Channel' Panel. If we are the current host school, we will **not** photocopy and retain child protection records. This is deemed from the Information Commissioners Office that this would contravene The Data Protection Act 2018, but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for themselves for audit purposes, this would be deemed as best practice.

343. All child protection records are reviewed periodically by the DSL (or a deputy) and checked to be chronological, tidy, legible and factual in content. The exception to this is safeguarding records where there are concerns of CSE, these are checked by the DSL every six months. This should be undertaken each year, as records may sometimes be immediately required by professionals. Where reports are needed for child protection and safeguarding meetings, these should include attendance figures.

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

345. We will follow the guidance on the child protection file set out in Annex B KCSIE.

Opportunities to teach safeguarding

We will teach children about how to keep themselves and others safe, including online. Our Personal Development curriculum is delivered in accordance with the RSHE Statutory Guidance July 2025. It is age-appropriate, inclusive, and designed to equip pupils with the knowledge and skills to recognise and report abuse, understand healthy relationships, and manage their mental and physical wellbeing. Personal Development contributes to our wider safeguarding culture and is responsive to the needs of our pupils.

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

347. Safeguarding themes are integrated across the curriculum, including RSHE, computing, and pastoral education. Lessons are adapted to meet the needs of SEND and EAL learners, and pupil voice is used to inform curriculum planning. Staff are trained to deliver safeguarding content in an age-appropriate and inclusive manner.

348. Safeguarding is embedded throughout our curriculum. Through RSHE, PSHE, Computing and wider curriculum opportunities, pupils are taught:

- Healthy and respectful relationships.
- Consent and personal boundaries.
- Online safety and digital resilience.
- Mental health and emotional wellbeing.
- Risks associated with exploitation.
- Extremism and radicalisation.
- Bullying, discrimination and prejudice.
- Substance misuse awareness.
- How to seek help and report concerns.

349. Our safeguarding curriculum content is informed by safeguarding data, pupil voice, local intelligence, emerging risks and the needs of our school community, and adapted to remain responsive to needs.

Online safety

350. Online safety is an integral part of our safeguarding arrangements. We recognise that children experience both the benefits and risks associated with digital technologies. Our approach seeks to educate, empower and protect children through a combination of:

- Age-appropriate online safety education.
- Staff training and awareness.
- Appropriate filtering and monitoring systems.
- Active parental engagement.
- Robust safeguarding and behaviour procedures.

We regularly review risks relating to content, contact, conduct and commerce and ensure our online safety arrangements are responsive to emerging threats including AI-generated content, deepfake imagery, nudification technologies, misinformation and online exploitation. Concerns relating to online safety are recorded in accordance with school safeguarding procedures and reviewed regularly by the DSL and Online Safety Lead.

351. We recognise online safety is a major concern for all professionals.

352. We believe it is essential that children are safeguarded from potentially harmful and inappropriate online material.

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

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

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

- **contact:** being subjected to harmful online interaction with other users; or generative AI applications that stimulate 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 generate using AI and online bullying, and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

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

356. We meet the DfE's Filtering and Monitoring Standards (2023) and conduct an annual review of our systems, including a risk assessment of online access and exposure.

357. In accordance with KCSIE 2026 Annex B, our DSL and Online Safety Lead understand the filtering and monitoring systems in place, are trained to manage them effectively, and know how to escalate concerns appropriately. We ensure our filtering and monitoring provision is proportionate to the risks faced by our pupils and supports a safe online environment.

358. The DSL and Online Safety Lead work together to review the effectiveness of filtering and monitoring arrangements annually and respond to concerns identified through these systems.

359. In line with the Department for Education's Generative AI: Product Safety Expectations (2025), our setting recognises the importance of ensuring that any generative AI tools used in school are safe, age-appropriate, and aligned with our safeguarding responsibilities.

360. We will ensure that:

- AI tools are risk-assessed before use, with particular attention to safeguarding, data protection, and misinformation risks.

- Staff and pupils are educated on the limitations of generative AI, including the potential for bias, hallucinated content, and inappropriate outputs.
- Generative AI is not used for decision-making about individual pupils, especially in relation to safeguarding, behaviour, or SEND provision.
- Children's data and intellectual property are protected, and AI tools are only used in line with our data protection and filtering policies.
- AI-generated content is critically evaluated, and pupils are taught to question the reliability and origin of digital content, including deepfakes and synthetic media.
- Staff are trained to understand the risks and opportunities of AI in education and to model responsible use.
- We will only adopt generative AI tools that meet the DfE's safety expectations and will review their use regularly as part of our digital safeguarding strategy.

361. Staff are aware that AI-generated content, including deepfake imagery, synthetic media and AI-assisted grooming, may be used to facilitate abuse, exploitation, bullying, harassment, extortion or misinformation. Concerns involving AI-generated content will be managed through safeguarding procedures in the same way as any other online safeguarding concern.

362. We take seriously our duties to assist parents and help them with online safeguarding resources. As such, we will make them aware of relevant support services.

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

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

365. While considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, we will do all

that we reasonably can to limit children's exposure to risks from our IT system. We will ensure we have appropriate filters and monitoring systems in place. The leadership team and relevant staff, such as online safety lead will obtain an understanding of the filtering and monitoring provisions in place and manage them effectively and know how to escalate concerns when identified. We will do this by considering the age range of our children, the number of children, how often they access the IT system and the proportionality of costs versus risks.

366. The appropriateness of our filters and monitoring systems has been informed in part, by the risk assessment required by the Prevent Duty. To meet this duty, we will work to meet the digital and technology standards. We will:

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

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

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

369. Our trustees and governing body will question school leaders to gain a basic understanding of our approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools, which can be used to improve the approach.

370. Mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring on online safety.

371. The Learning Community Trust expects academies to adhere to IT and Data relevant Policies as published. This includes the Staff Code of Conduct, Acceptable Use of IT and the Social Media Policy. We will make all aware of the existence and importance of these policies. Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion.

Mobile and smart technology -

372. Our setting is a mobile phone-free and smart technology-free environment by default; We adhere to the Statutory guidance on Mobile phones in schools, whereby pupils do not have access to their mobile phone and smart technology throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

373. Pupils are not permitted to use mobile phones and smart technology during the school day unless authorised by a senior member of staff for medical, educational or safeguarding purposes.

374. Mobile phones and smart technology brought onto site must remain switched off and stored securely in accordance with school procedures.

375. Staff are prohibited from using personal devices to communicate directly with pupils or parents unless authorised through approved safeguarding arrangements.

376. Photographs and videos of pupils will only be taken using school-approved devices and systems.

377. Visitors are expected to comply with school safeguarding expectations relating to the use of mobile and smart technology while on site.

378. Where a mobile phone is brought into school, it is to be put int the secure lock box in the pupil's tutor room upon entry int the morning and then it will be given back to them during the 10 min tutor period at the end of the day.

379. If a pupil refuses to hand their phone in the morning or is seen with it on their person and refuses to hand it over, the pupil will be suspended. If the pupil complies and hands the phone over to a member of staff, they will receive a 60 minute detention and a parent/carer will need to collect the phone from reception at the end of the day.

Inspection

380. We recognise our responsibilities for safeguarding within the remit of Ofsted

The use of 'reasonable force'

381. There are circumstances when it is appropriate for staff in our setting to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means us 'using no more than is needed.' Our

use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

382. We will always follow the advice for schools on the Use of Reasonable Force in Schools. We will also have regard to additional guidance Reducing the Need for Restraint and Restrictive Intervention for children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties in health and social care services and special education settings. Please also refer to the Use of Restrictive Interventions Policy.

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

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

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

Hiring out our facilities and premises-

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

387. When services or activities are provided by us, under our own direct supervision or management, our own arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. We will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place including inspecting these; and ensure that there are arrangements in place to

liaise with us on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this may lead to termination of the agreement.

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

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

Alternative provision

390. The cohorts of pupils in Alternative Provision often have complex needs. As a governing body/proprietor of this Alternative Provision setting, we are aware of the additional risk of harm that our pupils may be vulnerable to.

391. We will follow the statutory guidance for commissioners of Alternative Provision.

392. We will maintain up-to-date records of the address of the alternative provision provider, including any subcontracted or satellite sites the pupil may attend. We will ensure that we always know where the pupil is during school hours. We will review all alternative provision placements at least half-termly to ensure:

- the pupil is attending regularly,
- the placement remains safe and appropriate,
- and the provision continues to meet the pupil's needs.

Where safeguarding and/or behavioural concerns arise, we will immediately review the placement and, if necessary, terminate it unless or until those concerns are satisfactorily addressed.

Absent from education

393. We believe children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. Our response to persistently and severely absent pupils and children,

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

394. The recognised figure for severely absent is 50% or less and persistent absence is being less than 90%, although concerns may still be raised if above this. We will require the behaviour and attendance lead to refer to and use the established protocol document of notification to the Local Authority, filling out the appropriate paperwork, policies and procedures for identifying all pupils who are absent from education and policies and procedures for pupils on a modified timetable (available from Telford & Wrekin Council). We recognise that pupils who are not accessing full-time education are at greater risk of abuse, neglect and exploitation than other children. We therefore aim to reduce the number of pupils accessing a modified timetable. We will ensure any pupils accessing a modified timetable are seen regularly by school staff to help to ensure their safety and welfare. It is our aim that pupils access modified timetables for the limited periods of time and children who on a child protection, child in need plan and/or have an Education Health Care Plan are not placed on a modified timetable. We will regularly monitor and review the use of modified timetables.

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

396. Where children leave the classroom or leave our grounds without permission, this is covered within our behaviour management policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5); 'Anyone who has care of a child without parental responsibility may do what is "*reasonable*" in all the circumstances to safeguard and promote the child's welfare. It is likely to be "*reasonable*" to inform the police, or children's services departments, and, if appropriate, their parents, of the child/young person's safety and whereabouts'. However, in principle, if a pupil runs out of class we will establish where he or she has gone. Staff will not run after them but will seek additional support. It is advisable to keep a watchful eye on any children who have taken themselves out

of our building and possibly out of our grounds, unless this watchful eye provokes the child to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a child is no longer on the premises, we will contact parents in the first instance. If they are not contactable, we will inform the police that a pupil has left and is at risk.

397. Where children go missing, including leaving school without permission, we will follow the West Mercia Pathway for Children who go Missing from Home, care or Education. We always deem it appropriate to report pupils who go missing from school to the Police and children's services where we or parents cannot locate the child quickly.

398. The DSL, Attendance Lead and Senior Leadership Team review attendance data regularly to identify pupils who may be at increased safeguarding risk. Attendance concerns are considered alongside safeguarding, welfare, behaviour and academic information to ensure children receive timely support. Persistent absence, severe absence and patterns of lateness are treated as potential indicators of unmet need, abuse, neglect or exploitation and will be investigated appropriately. The DSL will routinely triangulate attendance, behaviour, safeguarding, SEND and welfare information to identify emerging safeguarding concerns.

Elective Home Education (EHE)

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

400. From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended. This means we inform Telford & Wrekin Council of all deletions from our admission register when a child is taken off roll.

401. We will follow Telford and Wrekin Local Authority EHE Policy and procedures. elective-home-education-policy-2025-2026-final.pdf

402. Where a parent has provided written notification to the school of their intention to EHE or where the parent has expressed an interest in electively home educating their child the school must offer a MAM (Multi-agency meeting) at a mutually convenient date and time with parents and all relevant professionals, as set out in Keeping Children Safe in Education, para.180. The expectation is the school will lead the MAM and a member of the senior leadership team will be in attendance at the MAM along with all relevant professionals. The EHE team will prioritise

attending MAMs for children who are on a child protection plan, child in need plan or have an allocated social worker. Requests for attendance at other MAMs will be considered on a case-by-case basis. Schools should complete part 1 of the MAM form and return before the arranged meeting. Part 2 of the MAM form must be completed and return after the MAM has taken place. It is the responsibility of the 9 school to complete part 2 of the MAM form in all circumstances, along with a copy of the de-registration letter if this has been received.

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

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

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

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

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

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

Children requiring mental health support

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

409. We will help prevent mental health concerns by promoting resilience as part of our integrated, whole setting approach to social and emotional wellbeing, which is tailored to the needs of our pupils.

410. All staff are aware that mental health concerns can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

411. All staff are aware that in some cases mental health concerns may develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff know that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

412. Staff are alert to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health concern or be at risk of developing one.

413. Staff are alert to other signs that may indicate a child is struggling with poor mental health these could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

414. Staff understand that not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. We ensure that any interventions offered are evidenced as safe and effective and appropriate for the need of the child and phase of education.

415. If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow the child protection policy and speak to the designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

416. We recognise only appropriately trained professionals should attempt to make a diagnosis of a mental health concern.

417. Where children have a mental health need, we will implement a safety plan. We will use guidance from the following sources to implement a safety plan for pupils with mental health needs. Safety plans will be dynamic and regularly reviewed.

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

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

419. Like with medical conditions, we will always obtain confirmation of mental health diagnoses from a suitable professional when diagnosis is self-reported or reported by parents or carers.

420. We will follow the DfE guidance on Mental Health and Behaviour in Schools.

421. **Our senior mental health lead is Heather Murphy.** They are a member of our senior leadership team. This work is closely supported by Jacqueline Massey who is a Designated Safeguarding Officer.

422. Staff will also refer to our Mental Health & Well-being policy.

Suicide Intervention

423. We accept and understand that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. We to work with our pupils and work in partnership to support anyone in our community that may have thoughts of suicide. We will follow our Suicide Intervention Policy to assist wherever we can in making those in our care as safe as is possible. We will also make staff aware of the following useful link in raising awareness of the subject http://zerosuicidealliance.com/

Looked after children and previously looked after children

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

championing the educational attendance, attainment and progress of children in kinship care.

425. We recognise a previously looked after child potentially remains vulnerable. When dealing with looked after children and previously looked after children we will work with all agencies to take prompt action where necessary to safeguard these children.

The designated teacher

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

427. We will follow the statutory guidance on The Roles and Responsibilities of the Designated Teacher.

Virtual School Heads and Kinship Care

428. As a maintained academy, the designated teacher will work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher also works with the virtual school head to promote the educational achievement of previously looked after children. We will follow the statutory guidance on 'Promoting the Education of Looked After Children.'

429. The role of Virtual School Heads includes a non-statutory responsibility to promote the educational achievement of all children in kinship care. We recognise the importance of this role in supporting children living in informal and formal kinship arrangements, who may face additional barriers to education.

430. We will work with the Virtual School Head in line with the non-statutory guidance 'Promoting the education of children with a social worker and children in kinship care arrangements' to ensure that these pupils receive appropriate support and that their needs are reflected in our safeguarding and pastoral systems.

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

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

Children who have special educational needs and disabilities (SEND) or health issues

433. We recognise that children who have SEND or certain health or physical health conditions can face additional safeguarding challenges. We accept the additional barriers that can exist when recognising abuse, neglect and exploitation of children 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 disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEND being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

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

Children Questioning their Gender

The school will keep this section under continual review and will update procedures in line with any revised statutory guidance, case law, DfE advice or EHRC guidance.

435. We recognise that some children and young people may question their gender and may seek support from trusted adults within the setting. We will respond to all children with sensitivity, respect and professionalism, while ensuring that our safeguarding responsibilities remain paramount. We will act in accordance with the requirements of KCSIE 2026.

436. Staff are aware that children questioning their gender may experience a range of vulnerabilities, including mental health difficulties, social and emotional stress, family or peer relationship difficulties, and bullying, including discriminatory bullying. Staff should remain professionally curious and consider the full range of factors that may be affecting a child's wellbeing.

437. Staff will not initiate discussions or actions relating to social transition. Where a child or their parent/carer requests support relating to social transition, the request will be considered on an individual basis through a safeguarding-led process. Decisions will be made in accordance with the school's statutory safeguarding duties, relevant equality and human rights legislation, and with consideration of the welfare, rights and needs of the child, other pupils and the wider school community

438. The Designated Safeguarding Lead (DSL) will be involved in considering any request for support with social transition and appropriate records will be maintained. In the vast majority of cases, parents/carers will be involved at the earliest opportunity and their views will be given significant weight in decision-making. Where involving a parent/carer would place a child at risk of harm, safeguarding procedures will be followed and advice sought from the DSL and, where appropriate, external agencies.

439. We recognise that social transition is an active intervention and will take a careful, evidence-informed approach when considering any request for support. Decisions will be based on the child's best interests, relevant professional advice, safeguarding considerations and the impact on others. Support arrangements will be reviewed regularly and amended where circumstances change.

440. We are committed to preventing and responding to all forms of bullying, harassment and discrimination. Any bullying related to gender questioning, gender expression, sex, sexual orientation, disability, race, religion or any other protected characteristic will be taken seriously and addressed promptly in accordance with the Behaviour and Anti-Bullying Policies.

441. We will ensure that records relating to pupils accurately reflect their biological sex where this is required for safeguarding, legal and statutory purposes. Relevant staff will be provided with information necessary to fulfil their safeguarding responsibilities.

442. We will ensure that access to toilets, changing facilities, residential accommodation and participation in single-sex activities are managed in accordance with statutory requirements, safeguarding obligations and the provisions set out in KCSIE 2026.

443. Where a child wishes to reverse or change previously agreed arrangements relating to social transition, the school will work with the child, parents/carers and relevant professionals to provide appropriate support and review safeguarding arrangements accordingly.

444. Any request relating to social transition will be considered through a documented risk assessment and safeguarding process led by the DSL, with the involvement of parents/carers unless doing so would place the child at risk of significant harm. The rationale for decisions, considerations of the child's best interests, any professional advice received, and review arrangements will be clearly recorded.

445. Our RSHE curriculum includes content on equality, respect for others, and the law. It is inclusive of all pupils and reflects the diverse backgrounds and identities

of our school community, including those who are LGBT. This is in line with the RSHE Statutory Guidance (2025) and the Equality Act 2010.

Legal Definition of Sex and Equality Act Compliance

446. In line with the UK Supreme Court judgment (*For Women Scotland v The Scottish Ministers*, 2024) and the Equality and Human Rights Commission's interim guidance (April 2025), we recognise that under the Equality Act 2010, the protected characteristic of "sex" refers to 'biological sex.' **This means:**

- A "woman" is a biological female.
- A "man" is a biological male.
- A person who identifies as transgender does not change their legal sex for the purposes of the Equality Act, even if they hold a Gender Recognition Certificate.

447. We will ensure that our safeguarding, curriculum, facilities, and equality practices reflect this legal definition. Where single-sex services or spaces are provided, decisions will be made in accordance with the Equality Act 2010 and relevant statutory guidance, with due regard to the safety, dignity, and privacy of all pupils. We will continue to support all pupils with sensitivity and respect, while ensuring compliance with our legal duties under the Equality Act 2010.

Staff

448. All staff, supply staff, contractors and visitors, are informed of the name of the DSL and deputies and our procedures for protecting children, for example, how to report their concerns, suspicions and how to receive, record and report disclosures.

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

Parents

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

451. We aim to help parents to understand their responsibility for the welfare of all children, which includes their duty to refer cases to social care services and/or police in the interests of the child. In line with Working Together to Safeguard Children 2026, we aim to build positive, trusting, and co-operative relationships with parents and carers. We recognise that effective safeguarding is most successful when families are engaged as partners in the process of support and protection. In line with RSHE statutory guidance, we are transparent with parents about the content of our RSHE curriculum. Parents have the right to request withdrawal from sex education (but not relationships or health education), and we will work in partnership with them to address any concerns. We also ensure that any external agencies or resources used in RSHE are carefully vetted and align with our safeguarding principles. The governing body will include a child protection statement in our prospectus, and all parents can view a copy of this policy.

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

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

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

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

456. All complaints should be made via our complaint's procedures.

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

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

459. Our setting is a private place. We will therefore act to ensure they remain a safe place for all. The public has no automatic right of entry.

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

Changing in school

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

Part three: Safer Recruitment

462. We will meet all requirements as set out in KCSIE 2026, Part three: Safer recruitment.

463. Please see our safer recruitment procedures.

Recruitment and selection process

464. We aim to create a culture that safeguards and promotes the welfare of all children. As part of this culture, we will adopt robust recruitment procedures that help to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our setting. We follow the safer recruitment procedures outlined in Part Three of KCSIE 2026, including checks for regulated activity, overseas checks, and recording of vetting information.

465. Volunteers are not permitted to begin working within our setting until we have received the volunteer's enhanced DBS certificate including barred list information

in line with the EYFS framework 2026 and KCSIE, part 3 safer recruitment requirements.

466. We will ensure that **all** those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training. As a result, all interview panel members will have completed safer recruitment training.

467. The following persons have completed safer recruitment training:

- **David Hubbard**
- **Korina Papagianni**
- **Nikita Moore**
- **Fiona Maiden**
- **David Smith**

Pre-appointment vetting checks, regulated activity and recording information

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

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

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

Visitors

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

471. We will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Headteacher/Principal will use their professional judgment about the need to escort or supervise such visitors.

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

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

Alternative provision

474. Where we place a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will undertake checks to be satisfied that the provider meets the needs of the pupil.

475. We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment. We will also obtain written confirmation that the alternative provider will inform us of any changes in staffing or other arrangements that may affect the safety or welfare of the pupil, so that we can ensure appropriate safeguarding checks are carried out on new staff. Please also see our Alternative provision policy.

Adults who supervise children on work experience

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

477. Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. We will consider the specific circumstances of the work experience and give consideration in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves, and
- providing the teaching/training/instruction frequently (more than three days in a 30- day period, or overnight).
- If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, we may ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

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

Children staying with host families (homestay)

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

480. We will always consider what intelligence/information will best inform our assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. We will use our professional judgement to decide what will be relevant. To help inform our assessment, we will obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed, it will also allow us to consider, alongside all other intelligence that we have obtained, whether the adults would be a suitable host for a child. We will also decide whether it is necessary to

obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

Host families – homestay during exchange visits

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

482. We will follow the guidance set out in Annex E of KCSIE with regard to arranging homestay – suitability of adults in UK host families, homestay – suitability of adults in host families abroad and the additional action for extended homestays.

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

Private fostering

484. We recognise that a private fostering arrangement occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

485. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

486. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's social care as soon as possible. If we become aware of a private fostering arrangement for a student that has not been notified to children's social care, we will encourage parents and private foster carers to notify them and will share information with children's social care as appropriate.

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

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

488. We believe safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from our whole community to

ensure the safety and welfare of children is embedded in all of our processes and procedures and consequentially enshrined in our ethos.

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

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

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

Appendix A: Protective Security and Preparedness

A. Embedding a Security Culture

We promote a whole-setting approach to security awareness and preparedness. All staff receive training to identify suspicious activity and understand their role in maintaining a secure environment. Security is embedded within the safeguarding culture and emergency planning processes.

B. Staff Roles in Protective Security

The Headteacher is designated as the Security and Incident Lead. All staff, including non-teaching staff, are briefed on their responsibilities in the event of an incident. These roles are defined in the emergency plan and reviewed annually.

C. Tailoring Emergency Plans to the Setting

The emergency plan is tailored to the site layout, pupil needs, and local risks. Vulnerabilities such as building access, location, and events are considered. Plans are tested annually through drills and reviewed following any incidents.

D. RUN HIDE TELL Protocols

All staff and pupils are trained in the RUN HIDE TELL principles. Age-appropriate materials are used to educate pupils on how to respond to threats. Visual reminders, such as posters are displayed in key areas.

E. Grab Kits

Grab kits are maintained in the school office and include site maps, contact lists, first aid supplies, high-visibility vests, and emergency communication tools. These kits are checked termly and updated as needed.

F. Communication During an Incident

Procedures are in place for internal and external communication during incidents. The Headteacher or a designated deputy liaises with emergency services and the local authority. Parents are informed via the emergency communication system.

G. Post-Incident Welfare and Review

Welfare support is provided to pupils and staff following incidents, including access to counselling. A post-incident review is conducted to evaluate the response and update plans. Lessons learned are shared with staff and governors.

H. Training and Resources

Staff complete training via National College. The setting uses the Protective Security and Preparedness self-assessment tool to review readiness. Staff receive annual safeguarding updates, which includes security preparedness. Protective security and preparedness for education settings - GOV.UK