



Wembley
Multi-Academy
Trust

ACHIEVEMENT FOR ALL



SAFEGUARDING POLICY

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WEMBLEY HIGH TECHNOLOGY COLLEGE MISSION STATEMENT:

Our mission is to deliver 'Achievement for All', one child at a time. We do this by creating a dynamic and inclusive learning environment where every student is empowered to achieve the grades that unlock the doors of opportunity. Driven by our core values of hard work, ambition, resilience, empowerment, diversity, and helping others, we believe that academic excellence is the golden ticket to success. We are committed to equipping our students with the skills, knowledge, and love of learning that they need to excel, ensuring they have the confidence and capability to shape a better world. Through perseverance and collaboration, our students will not only achieve their personal goals but also become compassionate leaders who inspire positive change.

KEY CONTACTS

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EXECUTIVE SUMMARY

This Safeguarding Policy outlines the responsibilities and practices of Wembley High Technology College (WHTC) in ensuring the safety and wellbeing of students. It is aligned with statutory guidance from the Department for Education (DfE), including Keeping Children Safe in Education (2025). Key updates include distinct sections on Online Safety, Early Help, Whistleblowing, Low-Level Concerns, and the Use of Reasonable Force.

OUR APPROACH

Wembley High Technology College (WHTC) is committed to the vital contribution all teaching staff, support staff and trustees and governors make to safeguarding children.

We ensure that safeguarding and child protection concerns and referrals are handled sensitively, professionally and actions that support the specific needs of the individual child are undertaken. The child's interests always come first. Through providing a caring, safe and stimulating environment when teaching the academic curriculum, RSHE, Citizenship, British values, equality, SMSC and wider enrichment, we aim to foster an atmosphere of trust, respect and security in which all pupils can thrive.

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This policy has been drawn up in line with “Keeping Children Safe in Education”, September 2025. School’s legal duty to safeguard vulnerable individuals is set out in:

- Keeping Children Safe in Education, September 2025
- Working Together to Safeguard Children, December 2023
- The Children Act 2004
- The Education Act 2002
- OFSTED’s Education Inspection Framework, July 2023
- The Counter Terrorism and Security Act 2015
- Mandatory reporting of FGM – procedural information, updated Jan 2020.
- The School Staffing (England) Regulations 2009
- Statutory guidance on FGM
- Statutory guidance on the Prevent Duty

A. DEFINITION OF SAFEGUARDING

All children should be protected from risk of abuse and harm however, it is important to recognise that potentially, some children have an increased risk. Additional barriers can exist for some children with respect to recognising or disclosing abuse and harm therefore, we give special consideration to students who:

- Have special educational needs and/or disabilities
- Have a social worker
- Are young carers
- May experience discrimination due to their race, ethnicity, faith and belief or no faith, age, gender identification; sexuality
- Are pregnant or in receipt of paternity/maternity leave
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse, domestic abuse, or poor mental health
- Are at risk of FGM, sexual/criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are looked after or who have been previously looked after
- Are privately fostered
- Are in kinship care
- Are children missing education
- May be due to receive elective home education as formally requested by a parent/carer
- Are children accessing alternative provision

We ensure that all children have the same protection, regardless of any barriers they may face, and we are committed to anti-discriminatory practice and recognise children’s diverse circumstances.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection, and justice. We listen to our pupils and take seriously what they tell us, children are aware of the adults they can talk to if they have a concern.

We will ensure concerns are discussed with parents first unless we have reason to believe that by doing so would be contrary to the child’s welfare.

B. SAFEGUARDING DEFINITIONS, SIGNS AND INFORMATION

1. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
2. **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 following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given;
- Changing or different accounts of how an injury occurred;
- Bald patches;
- Wounds and scars;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

3. Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

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

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics and twitches;
- Self-harming, drug or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.
- N.B.: Some situations where children stop communication suddenly (known as "traumatic mutism") can indicate maltreatment.

4. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening.

- The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.
- They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.
- Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

5. **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 care-givers)
- or ensure access to appropriate medical care or treatment.

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor school attendance or often late for school;
- Poor concentration;
- Affection or attention needing behaviour;
- Illnesses or injuries that are left untreated; failure to organise medical appointments
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.

6. **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):** Both CSE and CCE are forms of abuse that 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, 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.

CSE and CCE 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.

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or 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.

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

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

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

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

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

Child Criminal Exploitation (CCE)

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.

Children can become trapped by this type of exploitation, 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.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be 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.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative 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.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

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. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or online.

All staff should understand that even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead.

It is essential that **all staff** understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to 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).

The school takes the child-on-child abuse very seriously. We educate our students and train our staff throughout the year to make sure that there is a culture of openness and that staff are vigilant. Our 'It's not just banter' tagline means that students understand that child on child abuse is taken seriously and will be seriously dealt with.

There are arrangements (DSL accessibility, email, anonymous reporting form) in place to encourage pupils to report abuse (confidentially or anonymously). These are easily understood and accessible.

We minimise the risk of child-on-child abuse through:

- Staff vigilance
- Staff training
- Encouraging students to report abuse by giving them mechanisms to report abuse and open access to the DSLs
- Taking appropriate actions when abuse is reported
- Our comprehensive programmes of education (RSHE, Citizenship, Inclusion and Equality, SMSC - under the PD umbrella)
- The curriculum subjects
- Engagement of a range of external organisations and providers who support us in this work.

Allegations of child-on-child abuse are recorded, investigated and dealt with by senior staff and DSLs. DSLs and pastoral staff will, depending on the specifics of the allegations, make arrangements to support the victims, perpetrators and any other children affected by child-on-child abuse. This may involve a range of strategies from school-based support to support from external agencies. Parents will be usually informed and involved. We understand that even if there are no reported cases of child-on-child abuse – it happens here and may just not be reported.

We have a zero-tolerance approach to abuse, and do not allow children to pass it off as banter nor just having a laugh. We promote the highest standards of behaviour which makes the school a safe place.

We ask the students of places/areas where they may not feel safe (in and out of school) and make sure that concerns in these areas are addressed (e.g. lighting, cameras, extra supervision, etc.). We have staff on duty before school, at break, lunch and after school to ensure the students are supervised at all times and cannot congregate in corridors or bathrooms. We have CCTV cameras in key locations around the premises.

There is an understanding that it is more likely that girls will be victims and boys' perpetrators, but we understand that all child-on-child abuse is unacceptable.

The different forms child on child abuse includes:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- 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)

Our RSHE and wider PD curriculum addresses the different forms of abuse so that children understand the inappropriateness of these behaviours. We have incorporated the DfE's guidance on use of reasonable force by schools in our policy.

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

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

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

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

Whilst **all staff** should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

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

Teachers must PERSONALLY report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead (or deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#). Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#).

9. **Mental Health:** **All staff** should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a staff member is concerned about the mental health of a child, they should speak to a member of the Safeguarding Team.

We offer support for the mental health for all pupils. These measures include online resources, a programme of personal development and regular contact with their teachers and other staff within the school. Further support will be provided by Senior Leaders or the DSLs as needed and, where appropriate, specialist external support is provided through working with CAHMS, CCS, WEST, etc. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children: click on [Rise Above](#) for links to all materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

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

More information can be found in the [Mental health and behaviour in schools guidance](#). Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Every Mind Matters](#) for links to all materials and lesson plans.

10. **Serious violence:** All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

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

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

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#).

The Police, Crime, Sentencing and Courts Act introduced in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

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

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

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

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

Signs to look out for

A young person's involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person's lifestyle should be discussed with them. Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls and/or having multiple handsets
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being.

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

12. Domestic Abuse: 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
- 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.

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

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

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

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

Operation Encompass - operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8.00am to 1.00pm, Monday to Friday on 0204 513 9990 (charged at local rate).

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

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

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

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

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

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

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

14. **Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

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

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

15. **Children who are absent from education:** All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so- called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's unauthorised absence procedures and children missing education procedures.

Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).

16. **Children with family members in prison:** Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

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

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

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

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

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

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

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

19. **Modern Slavery and the National Referral Mechanism:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

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

20. **Preventing radicalisation:** Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **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.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are [possible indicators](#) that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised. Further information and a list of such indicators can be found at [Radicalisation and Extremism - Examples and Behavioural Traits \(educateagainsthate.com\)](https://www.educateagainsthate.com)

The Prevent Duty: All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiarise themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral. The Department has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

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

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

The [ETF Online Learning environment](#) provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

London Grid for Learning have also produced useful resources on Prevent ([Online Safety Resource Centre - London Grid for Learning \(lgfl.net\)](#)).

Channel: Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

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

Statutory guidance on Channel is available at: [Channel guidance](#).

21. **So-called ‘honour’-based abuse (including Female Genital Mutilation and Forced Marriage):** So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead. As appropriate, the designated safeguarding lead will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see below).

FGM

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

FGM mandatory reporting duty for teachers

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

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

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

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

Forced marriage

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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 deputy). As appropriate, the designated safeguarding lead (or 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.

22. Additional advice and support: There is a wealth of information available to support schools. The following list is not exhaustive but should provide a useful starting point:

Abuse	<ul style="list-style-type: none"> Supporting practice in tackling child sexual abuse – CSA Centre of Expertise on child sexual abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse. What to do if you're worried a child is being abused – DfE advice Domestic abuse: Various Information/Guidance – Home Office (HO) Faith based abuse: National Action Plan – DfE advice Forced marriage resource pack Disrespect NoBody campaign - GOV.UK – Home Office website Tackling Child Sexual Abuse Strategy – Home Office policy paper Together we can stop child sexual abuse – HM Government campaign
Bullying	<ul style="list-style-type: none"> Preventing bullying including cyberbullying – DfE advice
Children missing from education, home or care	<ul style="list-style-type: none"> Children missing education – DfE statutory guidance Child missing from home or care – DfE statutory guidance Children and adults missing strategy – Home Office strategy
Children with family members in prison	<ul style="list-style-type: none"> National Information Centre on Children of Offenders – Barnardo's in partnership with HM Prison and Probation Service
Child Exploitation	<ul style="list-style-type: none"> Trafficking: safeguarding children – DfE and Home Office guidance Care of unaccompanied and trafficked children – DfE statutory guidance Modern slavery: how to identify and support victims – HO statutory guidance Child exploitation disruption toolkit – HO statutory guidance County Lines Toolkit For Professionals – The Children's Society in partnership with Victim Support and National Police Chiefs' Council Multi-agency practice principles for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice
Confidentiality	<ul style="list-style-type: none"> Gillick competency Fraser guidelines – Guidelines to help with balancing children's rights along with safeguarding responsibilities.
Drugs	<ul style="list-style-type: none"> Drug strategy 2021 – Home Office strategy Information and advice on drugs – Talk to Frank website Drug and Alcohol education – teacher guidance & evidence review – PSHE Association
(So-called) "Honour Based Abuse" including FGM and forced marriage	<ul style="list-style-type: none"> Female genital mutilation: information and resources – Home Office guidance Female genital mutilation: multi agency statutory guidance – DfE, Department for Health, and Home Office Forced marriage – Forced Marriage Unit (FMU) resources Forced marriage – Government multi-agency practice guidelines and multi-agency statutory guidance FGM resource pack – HM Government guidance
Health and Well-being	<ul style="list-style-type: none"> Rise Above: Free PSHE resources on health, wellbeing and resilience – Public Health England Supporting pupils at schools with medical conditions – DfE statutory guidance Mental health and behaviour in schools – DfE advice Overview - Fabricated or induced illness – NHS advice
Homelessness	<ul style="list-style-type: none"> Homelessness code of guidance for local authorities – Department for Levelling Up, Housing and Communities guidance
Information Sharing	<ul style="list-style-type: none"> Government information sharing advice – Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers. Information Commissioner's Office: Data sharing information hub – Information to help schools and colleges comply with UK data protection legislation including UK GDPR.
Online safety-advice	<ul style="list-style-type: none"> Childnet provides guidance for schools on cyberbullying Educateagainsthate provides practical advice and support on protecting children from extremism and radicalisation London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements NSPCC E-safety for schools provides advice, templates, and tools on all aspects of a school or

	<p>college's online safety arrangements</p> <ul style="list-style-type: none"> • Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective • Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones • South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements • Use of social media for online radicalisation – A briefing note for schools on how social media is used to encourage travel to Syria and Iraq • Online Safety Audit Tool from UK Council for Internet Safety to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring • Online safety guidance if you own or manage an online platform – DCMS advice • A business guide for protecting children on your online platform – DCMS advice • UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online
Online safety - Remote education, virtual lessons and live streaming	<ul style="list-style-type: none"> • Guidance Get help with remote education resources and support for teachers and school leaders on educating pupils and students • Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely • London Grid for Learning guidance, including platform specific advice • National cyber security centre guidance on choosing, configuring and deploying video conferencing • UK Safer Internet Centre guidance on safe remote learning
Online safety - Support for children	<ul style="list-style-type: none"> • Childline for free and confidential advice • UK Safer Internet Centre to report and remove harmful online content • CEOP for advice on making a report about online abuse
Online safety - Parental support	<ul style="list-style-type: none"> • Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support • Commonsensemedia provides independent reviews, age ratings, & other information about all types of media for children and their parents • Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying • Internet Matters provide age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world • How Can I Help My Child? Marie Collins Foundation – Sexual Abuse Online • Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation • London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online • Stopitnow resource from The Lucy Faithfull Foundation can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online) • National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online • Parentzone provides help for parents and carers on keeping their children safe online • Talking to your child about online sexual harassment: A guide for parents – This is the Children's Commissioner's parental guide on talking to their children about online sexual harassment
Private fostering	<ul style="list-style-type: none"> • Private fostering: local authorities – DfE statutory guidance
Radicalisation	<ul style="list-style-type: none"> • Prevent duty guidance – Home Office guidance • Prevent duty: additional advice for schools and childcare providers – DfE advice • Educate Against Hate website – DfE and Home Office advice • Prevent for FE and Training – Education and Training Foundation (ETF) • Extremism and Radicalisation Safeguarding Resources – Resources by London Grid for Learning • Managing risk of radicalisation in your education setting – DfE guidance
Serious Violence	<ul style="list-style-type: none"> • Serious violence strategy – Home Office Strategy • Factors linked to serious violence and how these factors can be used to identify individuals for intervention – Home Office • Youth Endowment Fund – Home Office • Gangs and youth violence: for schools and colleges – Home Office advice • Tackling violence against women and girls strategy – Home Office strategy • Violence against women and girls: national statement of expectations for victims – Home Office guidance
Sexual violence and sexual harassment - Specialist Organisations	<ul style="list-style-type: none"> • Barndardo's – UK charity caring for and supporting some of the most vulnerable children and young people through their range of services. • Lucy Faithful Foundation – UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline. • Marie Collins Foundation – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse. • NSPCC – Children's charity specialising in child protection with statutory powers enabling them to

	<p>take action and safeguard children at risk of abuse.</p> <ul style="list-style-type: none"> • Rape Crisis – National charity and the umbrella body for their network of independent member Rape Crisis Centres. • UK Safer Internet Centre – Provides advice and support to children, young people, parents, carers and schools about staying safe online.
Harmful sexual behaviour	<ul style="list-style-type: none"> • Rape Crisis (England & Wales) or The Survivors Trust for information, advice, and details of local specialist sexual violence organisations. • NICE guidance contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working. • HSB toolkit The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families. • NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework – free and independent advice about HSB. • Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self- assessment toolkit and guidance for addressing HSB in schools. • Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.
Support for Victims	<ul style="list-style-type: none"> • Anti-Bullying Alliance – Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support. • Rape Crisis – Provides and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence. • The Survivors Trust – UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse. • Victim Support – Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was. • Childline provides free and confidential advice for children and young people.
Toolkits	<ul style="list-style-type: none"> • ask AVA - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls. • NSPCC – Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children. • NSPCC – Resources which help adults respond to children disclosing abuse. • The NSPCC also provides free and independent advice about HSB: NSPCC – Harmful sexual behaviour framework • Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire - Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse. • Contextual Safeguarding Network – self-assessment toolkit for schools to assess their own response to HSB. • Childnet – STAR SEND Toolkit equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities. • Childnet – Just a joke? Provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9–12-year-olds. • Childnet – Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13–17 years old. • NSPCC – Harmful sexual behaviour framework an evidence-informed framework for children and young people displaying HSB. • Farrer & Co: Addressing child on child abuse: a resource for schools and colleges. This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to child-on-child abuse.
Sharing nudes and semi-nudes	<ul style="list-style-type: none"> • London Grid for Learning-collection of advice – Various information and resources dealing with the sharing of nudes and semi-nudes. • UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people – Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

C. KEY PRINCIPLES

These are the key principles of safeguarding at WHTC:

- Always see the child first.
- Never do nothing - Be vigilant and proactive.
- Build relationships.
- Do the simple things better.
- Outcomes of your work matter - not inputs.
- Do with, not to, others.

Every child is entitled to a broad and balanced curriculum. WHTC operates with public money: this should be spent wisely, targeting resources on the evidenced needs of children at school now. Assurance and audit are important aspects of this. Governance is corporate and decisions are collective, but individual Trustees can and should take the lead on specific aspects of school life such as safeguarding. The BoT Safeguarding Leader for WMAT is Alison Brannick. When issues arise, the headteacher will address them internally where possible and escalate them when this is necessary.

D. KEY PROCESSES

All staff are trained using the Safeguarding and Child Protection Policies and expected to read and sign acknowledgement of it as well as complete a short survey on the knowledge acquired through their reading and face to face CPD. Staff are also given a range of policies to read, adhere to, and sign acknowledgement of them annually. The staff bulletin highlights an aspect of safeguarding and reinforces key messages.

Staff briefings are used to ensure staff are kept up to date. Further staff training and CPD is delivered on Inset Days. Training is available online and can be accessed at any time by emailing the headteacher or DSL.

Staff have lots of opportunities to develop themselves on all the training available to them. We respond to the latest issues, both locally and nationally. Staff are regularly surveyed and quizzed on their safeguarding understanding and further training is arranged as required.

E. EXPECTATIONS

All staff and visitors will:

- Be familiar with this safeguarding and child protection policies, including related policies such as e-safety policy;
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers, etc.
- Actively implement individual plans e.g., support plans, Child in Need plans and interagency Child Protection plans;
- Be alert to signs and indicators of possible safeguarding concerns;
- Record concerns and work closely with the Designated Safeguarding Leads;
- Deal with a disclosure of abuse from a child in line with this guidance - you must inform the Designated Safeguarding Lead immediately, and provide a written account as soon as possible;
- All staff have completed four Level 2 Training courses with an accredited provider which covers Child Protection in Education, Raising Awareness of Child on Child Peer Abuse, The Prevent Duty and a Practical Guide to GDPR in Education.
- Senior staff have completed Level 3 Child Protection Training.
- DSLs are all trained to Level 3 in Safeguarding.

F. THE DESIGNATED SAFEGUARDING LEADS

The DSLs have lead responsibility and management oversight and accountability for safeguarding and child protection and, are responsible for coordinating all child protection activity.

The Designated Safeguarding Leads will lead regular case monitoring reviews of vulnerable children. These reviews must be evidenced by minutes and recorded in case files.

- When the school has concerns about a child, the Designated Safeguarding Leads will decide what steps should be taken and should inform the Headteacher.
- Child Protection information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the Designated Safeguarding Leads feel their having knowledge of a situation will improve their ability to deal with an individual child and / or family. A written record will be made of what information has been shared, with whom, and when.
- Child Protection records will be stored securely in a central place separate from academic records. Individual files will be kept for each child. Files will be kept for at least the period during which the child is attending the school, and beyond that in line with current data legislation and guidance.
- Access to these records by staff other than by the Designated Safeguarding Leads will be restricted, and a written record will be kept of who has had access to them and when.
- Parents will be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with

- parents will be in line with any home school policies and give due regard to which adults have parental responsibility.
- We do not disclose to a parent any information held on a child if this would put the child at risk of significant harm. We deal with the named contacts on the school records. We usually have two named contacts so that we can access the family quickly should the need arise.
- If a pupil/student moves from our school, Child Protection records will be forwarded on to the Designated Safeguarding Leads at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records (within 5 days) from 1st September 2025. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. We will record where and to whom the records have been passed and the date.
- “Special/Recorded Delivery” or secure online services will be used to send pupil records. For audit purposes a note of all pupil records transferred or received should be kept in either paper or electronic format. This will include the child’s name, date of birth, where and to whom the records have been sent and the date sent and/or received. If a pupil/student is permanently excluded and moves to a Pupil Referral Unit, Child Protection records will be forwarded on to the relevant organisation.
- Where a vulnerable young person is moving to a Further Education establishment, consideration will be given to the student’s wishes.
- The DSL is familiar with their responsibilities with respect to internet safety and in particular filtering and monitoring.
- For details of the DSLs role, please refer to Role of DSL, KCSiE 2025.

G. THE TRUSTEES

The Board of Trustees is the accountable body for ensuring safeguarding is effective at WHTC. The Trustees are both supportive and challenging in the scrutiny of safeguarding. They will ensure that:

- WHTC has a culture of vigilance and that staff understand their responsibilities to be always vigilant and report any safeguarding concerns straight away.
- WHTC has a safeguarding policy, which includes a child protection policy.
- WHTC operates “safer recruitment” procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers.
- At least one senior member of the school’s leadership team acts as a Designated Safeguarding Lead.
- The Designated Safeguarding Lead attends appropriate refresher training every two years.
- The Headteacher and all other staff who work with children undertake training on an annual basis.
- Temporary staff and volunteers are made aware of the school’s arrangements for Child Protection and their responsibilities.
- The school reviews the effectiveness of safeguarding, learns lessons and remedies any deficiencies or weaknesses brought to its attention without delay.
- The school has procedures for dealing with allegations of abuse against staff/volunteers.
- The Trustees review its policies/procedures annually.
- The Nominated Trustee for Safeguarding is Alison Brannick. The Nominated Trustee is responsible for liaising with the Headteacher and Designated Safeguarding Leads over all matters regarding Safeguarding issues. The role is strategic rather than operational – they will not be involved in concerns about individual pupils/students.
- The Nominated Trustee will liaise with the Headteacher and the Designated Safeguarding Leads to produce a termly reports for Trustees.
- Safeguarding Audits are carried out and trustee visits have a safeguarding focus.
- External reviews of safeguarding are carried out and any developmental points are actioned immediately.
- A member of the Trustees (Gareth Whiley) is nominated to be responsible for liaising with the local authority and other partner of agencies in the event of allegations of abuse being made against the Headteacher.

H. SAFER RECRUITMENT AND SELECTION

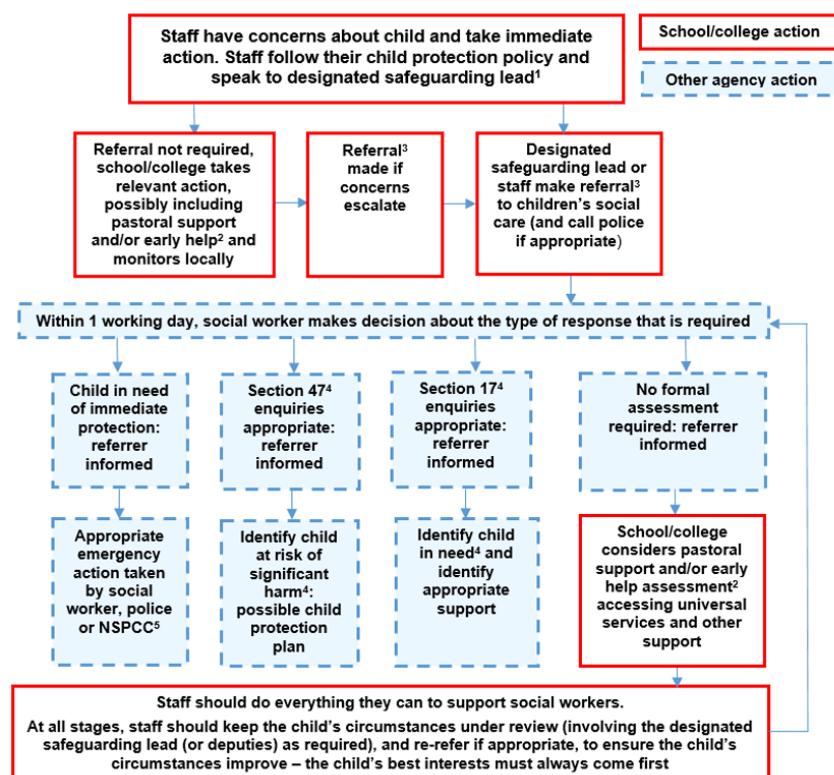
- The school pays full regard to ‘Keeping Children Safe in Education’ (Sept 2025).
- Safer recruitment practice includes online checks, scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.
- It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS). Headteacher and senior staff have been trained in safer recruitment.

- All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils.
- Online searches are carried out and the prospective candidates are made aware.
- For details, please refer to Safer Recruitment KCSiE 2025.

I. OUR ROLE IN PREVENTING ABUSE

- Our PD provision has been carefully mapped out to cover the statutory curriculum we must cover in RSHE and Citizenship. These aspects are taught and assessed and give students a thorough understanding of how to safeguard themselves and to thrive.
- In the other aspects of PD, we provide opportunities for students to develop a whole range of skills, concepts, attitudes and knowledge that promote their well-being and help them become resilient learners.
- Currently relevant safeguarding issues are addressed through the relevant PD, for example online safety, filtering and monitoring, consent, child on child abuse, self-esteem, emotional literacy, assertiveness, power, and relationship education, e-safety and bullying.
- The school's approach to online safety for staff and students is based on addressing the following categories of risk:
 - **Content:** Being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.
 - **Contact:** Being subjected to harmful online interaction with other users, such as peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - **Conduct:** Personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, e.g. consensual and non-consensual sharing of nudes and semi-nudes, and / or pornography, sharing other explicit images and online bullying.
 - **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and / or financial scams.
- Issues are also addressed through other areas of the curriculum, for example, English, History, Drama, Art and other aspects of the school's work, e.g. through assemblies and form time.
- All our policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour are taught coherently and systematically to ensure a whole school approach.
- Our Safeguarding Policy cannot be separated from the general ethos of the school, which ensures that pupils are treated fairly and with respect and dignity, they are taught to treat each other with respect, feel safe and have a voice. Students are listened to and encouraged and given every opportunity to report concerns.

Actions where there are concerns about a child



J. INVOLVING PARENTS OR CARERS

- Our preference is to discuss any Child Protection concerns with parents / carers before approaching other agencies, and we will endeavour to seek parents' consent before making a referral to another agency. However, there will be occasions when the school will contact another agency before informing parents/carers because it considers that in the best interests of the child or that contacting parents may increase the risk of significant harm to the child.
- Appropriate staff will approach parents / carers after consultation with the Designated Safeguarding Leads.
- Parents / carers will be informed about our safeguarding policy through the WHTC's website and parental meetings.

K. SAFEGUARDING PARTNERS IN BRENT – MULTI-AGENCY WORKING

- We follow locally agreed inter-agency procedures that are put in place by Brent Children's Trust Joint Commissioning Group.
- We have a responsibility to identify concerns early, provide help for children and families and prevent concerns from escalating.
- DSLs meet regularly and undergo the appropriate level of training. DSL training is up to date.
- We work closely with our safeguarding partners. The lead representatives are able to delegate their functions to: a) Director of Children and Young People LBB, b) Director of Quality, Brent CCG and c) Superintendent (Safeguarding Lead), North West BCU.
- We work in partnership with our safeguarding partners and other agencies in the best interests of the children.
- The Designated Safeguarding Leads normally make referrals. Where the child already has a safeguarding social worker, the request for service goes immediately to the social worker involved, or in their absence, to their team manager.
- We co-operate with any Child Protection enquiries conducted by children's social care: WHTC ensures representation at appropriate inter-agency meetings. We provide reports as required for these meetings. If the school is unable to attend, a written report will be sent.
- Where a pupil/student is subject to a Child Protection plan or a multi-agency risk assessment conference meeting, the school contributes to the preparation, implementation and review of the plan as appropriate.

L. OUR ROLE IN SUPPORTING CHILDREN

- We will offer appropriate support to individual children who have experienced abuse or who have abused others.
- An individual support plan will be devised, implemented and reviewed regularly for these children. This plan will detail areas of support, who will be involved, and the child's wishes and feelings. A written outline of the individual support plan will be kept in the child's Child Protection record.
- We will ensure that those who have suffered abuse are fully protected.
- We will ensure the school works in partnership with parents / carers and other agencies as appropriate.

M. CHILDREN WITH ADDITIONAL NEEDS

While all children have a right to be safe, some children may be more vulnerable to abuse. We will pay particular attention to the needs of vulnerable children.

N. STAFF GUIDANCE ON DEALING WITH A DISCLOSURE OF ABUSE BY A CHILD

When a child tells a member of staff about abuse, what must he/she do?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why. You must not promise confidentiality.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information. Use T.E.D questions i.e. tell me.... explain to me.... describe to me...

- Listen and remember - Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
- Check that you have understood correctly what the child is trying to tell you.
- Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB: It is not education staff's role to seek or investigate disclosures. The role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk. Staff must not deal with any disclosures by themselves. They must report these to the Designated Safeguarding Leads urgently. The Headteacher or the Designated Safeguarding Leads must report clear indications or disclosure of abuse to children's social care without delay. Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Line Manager, Designated Safeguarding Leads or Headteacher.

O. ALLEGATIONS AGAINST A MEMBER OF STAFF, TRUSTEES, GOVERNORS OR VISITORS

If staff have a safeguarding concern or an allegation is made about another member of staff (including supply staff, contractors, volunteers, and visitors) harming or posing a risk of harm to children, they should speak to the headteacher. If it relates to the headteacher, they should contact the chair of governors. If it relates to the chair of governors, they should contact the chair of trustees. All relevant email addresses and names are at the top of this document.

Please see Part 4 of KCSIE 2025 for further advice and guidance.

P. ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD

From KCSIE 2025:

Para 362. This part of the guidance is about managing cases of concerns/allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. In this part of the guidance reference is made to '**allegation**' for ease. This part of the guidance should be followed where it is alleged that anyone working in the school or a college that provides education for persons under 18 years of age, including supply teachers, volunteers and contractors has:

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

Para 363. states: The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk.

Para 364. Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

Para 365. It is important that policies and procedures make clear to whom allegations should be reported and that this should be done without delay. A "case manager" will lead any investigation. This will be either the headteacher or principal, or, where the headteacher is the subject of an allegation, the chair of governors or chair of the management committee and in an independent school it will be the proprietor.

Q. CHILD PROTECTION POLICY

Child Protection is part of Safeguarding and is about protecting children who may be at risk of harm or are being harmed.

i. Types of child protection issues staff may come across:

- Abuse
- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child on Child Abuse - Sexual violence and sexual harassment between children in schools
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Female genital mutilation
- Mental Health
- Serious Violence
- County Lines
- Domestic abuse (Operation Encompass including the National Domestic Abuse Helpline)
- Child abduction and community safety incidents
- Children missing from education
- Children with family members in prison
- Cybercrime
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Radicalisation
- Extremism (The Prevent duty, Channel)
- Honour-based Abuse including Forced Marriage and FGM

Signs to look out for:

- Changes in behaviour / attitude / work
- Signs of neglect – poor personal hygiene and clothing
- Marks on body – bruises, cuts, burns
- Being very withdrawn
- Inappropriate sexual behaviour / language
- Extreme anger
- Real upset at thought of teacher contact with home
- Food fads – overeating / undereating
- Constant tiredness
- Radicalisation – change in appearance / clothing. Pupil expressing extremist views.

ii. How to respond if a child tells you about something which might be a child protection issue:

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why. You must not promise confidentiality.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information. Use T.E.D questions i.e. tell me.... explain to me.... describe to me...
- Listen and remember - Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
- Check that you have understood correctly what the child is trying to tell you.
- Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB: It is not staff's role to seek or investigate disclosures. The role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk. Staff must not deal with any disclosures by themselves. They must report these to the Designated Safeguarding Lead urgently. The Headteacher or the Designated Safeguarding Lead must report clear indications or disclosure of abuse to children's social care without delay. Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Line Manager, Designated Safeguarding Lead or Headteacher.

iii. What might happen next

1. managing any support for the child internally via the school's own pastoral support processes.
2. undertaking an early help assessment, or
3. making a referral to statutory services, for example as the child might be in need, is in need or suffering, or is likely to suffer harm.
 - If there is a low level of need, the child will be given peer mentoring / adult mentoring / intervention with teachers /regular support meetings to ensure that problems are sorted out.
 - If there are clearly problems with the child / the family which are not abuse but to do with e.g. housing, anxiety, depression, bereavement, there will be a referral to an outside agency, such as CAF, CAMHS, Bereavement services, Youth Offending Team, CCS.
 - If there is even a suspicion that a child is at risk (physical, emotional, sexual, neglect) then the child will be referred to other appropriate agencies, e.g. Prevent Team Channel, Social Care.

iv. Children suffering or likely to suffer significant harm

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. This includes all forms of abuse and neglect.

v. What will the local authority do?

Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to 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. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process
- 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. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process, and
- further specialist assessments are required to help the local authority to decide what further action to take.

The referrer (usually the DSL) should follow up if this information is not forthcoming. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

vi. Record keeping:

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

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.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

**ALL REFERRALS MUST BE DONE IN WRITING.
PLEASE CONTACT THE DSL REGARDING ANY SAFEGUARDING MATTERS.**

R. EVALUATING OUR SAFEGUARDING PROCESSES

We carry out annually a complete safeguarding audit which evaluates the safeguarding and child protection work we do (by November of each year. The 2025 - 26 Audit will be carried out by Mr T. Best and Mr C. Kenny. This evaluation tool is scrutinised by the Trustees at the Risk and Compliance Meetings.

Frequent feedback is collected from staff (e.g., via surveys, quizzes, meetings, and action is taken to inform and update staff via the school bulletin. Further updates and training are available or provided as necessary.

S. LINKS TO OTHER POLICIES

- Acceptable Use of IT Policy
- Anti-Bullying Referral System
- Attendance Policy
- Behaviour Policy (Inc. Code of Conduct)
- Child Protection - Guidance for Staff
- Children Missing Education
- Complaints Procedure
- Drugs Policy
- First Aid Policy
- Health & Safety Policy
- Keeping Children Safe in Education 2025
- Managing Behaviour and Attitudes
- Promotion of British Values
- Reflection, Peer-counselling and Prayer Space Policy
- Relationship, Sex and Health Education Policy
- Safer Recruitment KCSiE 2025
- Social Networking Policy
- Statutory Guidance on Searching, Screening and Confiscation
- Supporting Pupils with Medical Needs
- Supporting Students with Medical Conditions Who Cannot Attend School
- Trips Policy
- Use of Reasonable Force in Schools Policy

SECTION II

SAFEGUARDING STANDARDS REQUIRED OF STAFF

Overview

The vast majority of adults who work with children in education settings act professionally. They seek to provide a safe and supportive environment, which secures the well-being and very best outcomes for children and young people in their care. Much relies on pupil and staff interactions where tensions and misunderstandings can occur. It is here that staff behaviours can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

This document seeks to ensure that the duty of care towards pupils is promoted by raising awareness of illegal, unsafe and unwise behaviour. It is explicitly stated so that it will assist staff to monitor their own standards and practice.

Through this guidance, trustees as employers give a clear message that unlawful or unsafe behaviour will not be tolerated and, where appropriate, legal or disciplinary action is likely to follow.

Whilst every attempt has been made to cover a wide range of situations, it is recognised that any such guidance cannot cover all eventualities.

Underpinning Principles

- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way.
- Staff should discuss and/or take advice promptly from a senior member of staff over any incident, which may give rise to concern.
- Records should be made of any such incident and of decisions made/further actions agreed, in accordance with school policy for keeping and maintaining records.
- Staff should apply the same professional standards and ensure they follow the equalities legislation.
- All staff should know the name of their Designated Safeguarding Lead and be familiar with local Child Protection arrangements and understand their responsibilities to safeguard and protect children and young people.
- Staff should be aware that breaches of the law and other professional guidelines are likely to result in criminal or disciplinary action being taken against them.

Safe Working Practices Required:

1. Introduction

Staff have a crucial role to play in shaping the lives of young people. They have a unique opportunity to interact with children and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff establish the safest possible learning and working environments. Staff should be familiar with the current [KCSIE](#) (in particular Part One and Annex A).

This means that these guidelines:

- *apply to all adults working in education settings whatever their position, roles, or responsibilities.*

2. Duty of Care

Teachers and other education staff are accountable for the way in which they exercise authority, manage risk, use resources and protect pupils from discrimination and avoidable harm.

All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful and professional relationships between staff and pupils and behaviour by staff that demonstrates integrity, maturity and good judgement.

Trustees, governors, staff and parents have legitimate expectations about the nature of professional involvement in the lives of pupils. When individuals accept a role that involves working with children and young people, they need to understand and acknowledge the responsibilities and trust inherent in that role.

This means that adults should:

- *always act, and be seen to act, in the child's best interests*
- *understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached*
- *avoid any conduct which would lead any reasonable person to question their motivation and intentions*
- *take responsibility for their own actions and behaviour*
- *report any incident to the relevant person within school promptly using appropriate systems*

3. Exercise of Professional Judgement

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, behaviour that is illegal, inappropriate or inadvisable. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably.

This means that staff should:

- *avoid any actions, words or behaviours that are inappropriate*
- *discuss the circumstances that informed their action, or their proposed action, with the DSL.*
- *be prepared to seek advice prior to any proposed action if problems are anticipated*
- *always discuss any misunderstanding/accidents with a senior manager*
- *always record discussions and actions taken with their justifications*
- *log any concerns and copy these to the Headteacher and the member of staff responsible for Child Protection (DSL).*

4. Positions of Power and Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil is not a relationship between equals and is a serious safeguarding breach.

There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that the unequal balance of power is not used in any way for personal advantage or gratification.

Wherever possible, staff must avoid behaviour, which might be misinterpreted by others, and must report and record any incident that they are privy to with this potential. Staff must not use their position of power and trust to influence politically. See guidance on political neutrality/impartiality in the professional conduct required of staff policy.

This means that adults should not:

- *use their status and standing to form or promote relationships with children, which are of a sexual nature*
- *use their power to collude with, intimidate, threaten, coerce or undermine pupils*
- *use their position to gain access to information for their own advantage and/or a child's or family's detriment*
- *all adults should be aware of acceptable ways in which a child can be disciplined and of the difference between discipline and bullying.*

5. Confidentiality

Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. In some circumstances staff may be given additional highly sensitive or private information. Information must never be discussed with other staff (it is confidential and privileged information) or used to intimidate, humiliate, or embarrass the pupil.

Confidential information about a child or young person should never be shared casually in conversation (e.g., in the corridor during break or lunchtime or in a staff workroom) or shared with any person other than on a need-to-know basis.

There are some circumstances in which a member of staff may be expected to share information about a child, for example when there is a safeguarding concern. In such cases, individuals have a duty to pass information on without delay, but only to the Designated Safeguarding Team member.

Confidential information should not be displayed where others can see it. Informalisation and casualisation of confidential information is unacceptable.

Gossiping is not acceptable and, if necessary, situations will be clarified publicly by a senior member of staff.

Any media or legal enquiries must be passed to a member of the senior leadership. Staff should not comment if contacted by any media, including social networks.

The storing and processing of personal information about pupils is governed by the Data Protection Act 1998. All staff must treat all pupil or staff information as confidential.

This means that staff:

- *need to be cautious when passing information to others about a child/young person*
- *are expected to treat information they receive about children and young people in a discreet and confidential manner*
- *in any doubt about sharing information they hold or which has been requested of them should seek advice from a senior member of staff*
- *should record information in an objective and sensitive way and be prepared to defend anything they have written. Staff should refrain from giving their personal views. Information must be factually correct and accurate.*

Staff, governors and trustees should use the DfE's data protection guidance for schools to help you:

- *Comply with data protection law*
- *Develop data policies and processes*
- *Know what staff and pupil data to keep*
- *Follow good practices for preventing personal data breaches*

6. Propriety and Behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people.

They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the public in general.

An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting. Teachers must appreciate the importance of their own professional status in society. They should recognise that professionalism involves using judgement over appropriate standards of personal behaviour.

This means that adults should not:

- *behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model*
- *make sexual remarks to a pupil (including email, text messages, Teams messages, phone or letter)*
- *discuss their own sexual relationships in the presence of pupils*
- *discuss a pupil's sexual relationships in inappropriate settings or contexts*
- *make (or encourage others to make) unprofessional personal comments about staff, students, the school or WMAT (in the presence of other staff or members of the public) which malign, scapegoat, demean or humiliate, or might be interpreted as such.*

7. Dress and Appearance

Staff should consider the manner of dress and appearance appropriate to their professional role which may be different from that adopted in their personal life.

Staff should ensure they are dressed professionally. Staff who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or misconduct. The Headteacher can legitimately request that individual members of staff alter their dress or appearance if it is casual or not in line with the high standards of professionalism expected in the school.

This means that adults should wear clothing which:

- *promotes a positive, formal and professional image*
- *is appropriate to their role*
- *is not likely to be viewed as offensive, revealing, or sexually provocative*
- *does not distract, cause embarrassment or give rise to misunderstanding*
- *is absent of any political or otherwise contentious slogans (this applies to property that staff may have as well, e.g. cups)*
- *is not considered to be discriminatory.*

The list above is provided as guidance and is not meant to be exhaustive. Staff should seek guidance from their LG Line Manager if they have any queries. The Headteacher will be the final arbiter on what is deemed appropriate.

8. Gifts

It is against the law for public servants to take bribes. Staff need to take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment.

There are occasions when children or parents wish to pass small tokens of appreciation to staff e.g. at Christmas or as a thank-you and this is acceptable. However, it is unacceptable to receive gifts of any significant value (the total value should not exceed £10).

Similarly, staff must not give personal gifts to students. These could be misinterpreted as a gesture either to bribe, or single out the young person. It might be perceived that a 'favour' of some kind is expected in return.

Any reward given to a young person should be agreed as a part of the school /WMAT reward system, recorded and not based on favouritism.

This means that adults should:

- *ensure that any gifts received or given are declared (please inform the accounts office by email)*
- *generally, only give gifts to an individual young person as part of an agreed reward system*
- *where giving gifts other than as above, ensure that these are of insignificant value and given to all children equally.*

9. Infatuations

A member of staff, who becomes aware that a pupil may be infatuated with themselves or a colleague, should discuss this immediately with a senior colleague so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

Staff should not spend excessive amounts of time with any pupil or pupil(s). This carries with it a risk of other students or staff perceiving it to be inappropriate (please see positions of power and trust - above).

This means that adults should:

- *report immediately any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff.*
- *Report any student(s) who are seeking them out and wanting to spend long periods of time with them.*
- *Always make sure that when they are alone with a student, there is visibility e.g., door is open.*

10. Social Contact

Staff must not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. This includes having contact with pupils via social media such as TikTok, Facebook, WhatsApp, Twitter, Instagram, MS Teams, gaming platforms, mobile phones and email. Staff must ensure that their own privacy settings and account settings for these sites are on maximum, so that pupils cannot access any details. Please see Social Networking Policy for further details.

Staff should not give their personal details such as home/mobile phone number, home or e-mail address to pupils unless the need to do so is agreed with a senior manager. Where appropriate, staff will be given the use of school-owned mobile phones.

This means that adults should:

- *always seek prior approval of any planned social contact. For example, when it is part of a reward scheme speak to the senior leader.*
- *report and record any social contact or attempted social contact, which might compromise the school/WMAT/staff or their own professional standing.*

11. Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Please note that in our diverse community there are particular cultural sensitivities around physical contact between male staff and female students. Staff should be aware of these cultural sensitivities and minimise any physical contact with students.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible and a record sent to the DSL. The school/WMAT has a Restraint Policy which must be adhered to.

This means that adults should:

- *be aware that even well-intentioned physical contact may be misconstrued by the child or an observer*
- *be aware that incidents when reported by the child to the parents may be misinterpreted*
- *always be prepared to explain actions and accept that all physical contact is open to scrutiny*
- *never touch a child in a way which may in any way be considered indecent*
- *never touch a child in affection or anger*
- *never indulge in horseplay, tickling or fun fights.*

12. Physical Education and other activities which require physical contact

Some staff, for example, those who teach PE and games, or who offer music tuition, will on occasion have to initiate physical contact with pupils in order to support a child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

This means that adults should:

- *consider alternatives, where it is anticipated that a pupil might misinterpret any such contact, perhaps involving another member of staff, or a less vulnerable pupil in the demonstration*
- *always explain to a pupil the reason why contact is necessary and what form that contact will take.*

13. Showers and Changing

Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Staff need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils. Specific ethnic or religious issues may need to be taken into account when deciding on appropriate behaviour with individual students.

This means that adults should:

- *avoid any physical contact when children are in a state of undress*
- *avoid any visually intrusive behaviour*

Where there are shower areas adults should:

- *announce their intention of entering*
- *avoid remaining in the room unless pupil needs require it.*

Adults should not:

- *change in the same place as children*
- *be in a state of undress where children see them*
- *shower with children.*

14. Pupils in Distress

There may be occasions when a distressed pupil needs comfort and reassurance. This may include age - appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

In cases where a child is upset as a result of bullying (including online bullying and phone bullying), staff should follow the schools' Bullying Referral System.

Where a member of staff has a particular concern about the need to provide this type of care and reassurance s/he should seek further advice from a senior manager.

This means that adults should:

- *consider the way in which they offer comfort to a distressed pupil*
- *always tell a colleague when and how they offered comfort to a distressed child*
- *record situations which may give rise to concern and follow school's procedures*
- *avoid being alone with the student*
- *avoid physical contact with students.*

15. Behaviour Management

Everyone has a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools.

Equally, staff should not use any form of degrading treatment to punish a pupil. The use of humour can help to defuse a situation but the humour should not be at the expense of a child. The use of demeaning or insensitive comments towards pupils is not acceptable.

This means that adults should:

- *not use force as a form of punishment*
- *try to defuse situations before they escalate*
- *keep parents informed of any sanctions by logging incidents on the school's MIS*
- *adhere to the school's Behaviour Management Policy.*

16. Sexual Contact with Young People

Any sexual behaviour by a member of staff with or towards a child or young person is both unacceptable and illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not.

The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. 'Working Together to Safeguard Children' defines sexual abuse as "forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening".

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child and manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a child might be construed as being part of a 'grooming' process, which is an offence.

KCSIE - Allegations that may meet the harm threshold

Para 362. This part of the guidance is about managing cases of allegations that might indicate a person poses a risk of harm if they continue to work in their present position, or in any capacity with children in a school. This guidance will be followed where it is alleged that anyone working in the school has:

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

Para 363 states that it includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children; this is known as transferable risk.

Para 364. An assessment of the transferable risk to children will be undertaken. If in doubt, the DSL will seek advice from the local authority designated officer (LADO).

Para 365. Allegations should be reported and that this should be done without delay. A “case manager” will lead any investigation. This will be either the headteacher or principal, or, where the headteacher is the subject of an allegation, the chair of governors will lead or commission the investigation.

17. Low Level concerns or allegations that do not meet the harm threshold

Low-level concerns

As part of a whole school culture to safeguarding we promote an open and transparent culture in which **all** concerns about all adults working with children are dealt with promptly and appropriately. A culture in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. When implemented correctly, this:

- encourages an open and transparent culture
- enable schools to identify inappropriate, problematic or concerning behaviour early
- minimises the risk of abuse, and
- ensures that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school/WMAT.

What is a low-level concern?

Para 431. As part of their whole school or college approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Para 423. Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Para 433. The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

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

Para 434. Such behaviour exists on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Para 435. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Para 436. All low-level concerns are shared responsibly with the right person (DSL), and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from becoming the subject of potential false low-level concerns or misunderstandings.

Staff code of conduct and safeguarding policies

Para 437 As good practice, WMAT trustees have set out what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of this is - to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour set out are lived, monitored and reinforced constantly by all staff.

WMAT trustees provide all staff with training on current [KCSIE](#) (all parts). There is a staff code of conduct, student behaviour policy, safeguarding policy and procedures (including Child Protection Policy). These are all shared with staff and staff sign to say they have read and understood them.

We achieve the purpose of low-level concerns by:

- ensuring that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised and helping identify any weakness in the school safeguarding system.

Sharing low-level concerns

All low-level concerns should be shared initially with the DSL or with the headteacher. The DSL will inform the headteacher of all the low-level concerns and in a timely fashion according to the nature of each low-level concern. The headteacher will be the ultimate decision maker in respect of all low-level concerns, although the headteacher may wish to consult with the DSL and take a more collaborative decision-making approach. Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold we will consult with their LADO.

We try to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns

Para 444. All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted; if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

Para 445. These records are kept confidential (with the DSL/HR) and held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed half termly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on the appropriate course of action.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

The school will retain low level concerns information on staff at least until the individual leaves their employment.

References

It follows that a low-level concern which relates exclusively to safeguarding will not be referred to in a reference.

However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

Responding to low-level concerns

If the concern has been raised via a third party, the headteacher (or a nominated person) will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses.

The information is collected to help categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for the decisions and action taken.

18. One to One Situations

Staff working in one-to-one situations with children and young people may be more vulnerable to allegations. Teachers and others should recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of pupils are met.

Staff should endeavour to follow these procedures at all times including during informal meetings at break time and instances after school when pupils may be waiting to be collected to go home or have missed their bus.

Pre-arranged meetings with pupils away from the school premises should not be permitted unless approval is obtained from their parent and the Headteacher or other senior colleague with delegated authority.

This means that adults should:

- *avoid meetings with pupils in remote, secluded areas of school (e.g. music practice rooms, offices which are not in view of others)*
- *ensure there is visual access and/or an open door in one-to-one situations*
- *inform other staff of the meeting beforehand, assessing the need to have them present or close by*
- *avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy*
- *always report any situation where a child becomes distressed or angry to a senior colleague*
- *consider the needs and circumstances of the child/children involved*

19. Transporting Children

In certain situations, e.g. out of school activities, staff or volunteers rarely may agree to transport children. This should only take place if the senior line manager has been informed and if the member of staff involved has the correct level of insurance. Parental permission must be given before any member of staff transports a pupil in a private vehicle. Wherever possible and practicable, it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort.

Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded.

This means that adults should:

- *plan and agree arrangements with all parties in advance, responding sensitively and flexibly to disagreements*
- *ensure that they are alone with a child for the minimum time possible*
- *be aware that the safety and welfare of the child is their responsibility until this is safely passed over to a parent/carer*
- *report the nature of the journey, the route and expected time of arrival to the general office in accordance with agreed procedures*
- *ensure that their behaviour and all arrangements ensure vehicle, passenger and driver safety.*

20. Educational Visits and After School Clubs, etc.

Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-school activity.

During school activities that take place off the school site or out of school hours, a suitable level of discipline must be maintained with staff remaining in a position of trust. Staff need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or a relaxation of the normal expectations. Staff behaviour must remain professional at all times.

Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip. All arrangements should be made in accordance with the school's trips and visits policy.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity. Staff must be aware of and follow the guidance of the school's policy on trips and visits.

This means that adults should:

- *always have another adult present in out of school activities, unless otherwise agreed with senior staff in school*
- *undertake risk assessments*
- *have parental consent to the activity*
- *ensure that their behaviour remains professional at all times*
- *adhere to the school's First Aid Policy*
- *make other staff aware of the task being undertaken*
- *explain to the child what is happening.*

21. Curriculum

Some areas of the curriculum can include or raise subject matter which is sexually explicit, or of an otherwise sensitive nature. Care should be taken to ensure that resource materials cannot be misinterpreted and clearly relate to the learning outcomes identified by the lesson plan. This plan should highlight particular areas of risk and sensitivity.

There may also be areas of the curriculum which could lead to pupils expressing views which are extremist or promoting religious conflict, or offensive to others (e.g. racist, sexist, homophobic). It is the duty of all teachers to challenge all contentious or unacceptable language, views and actions by pupils, making it clear that this is not acceptable in the school and log this on the school's MIS.

The curriculum can sometimes include or lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Responding to pupils' questions can require careful judgement and staff may wish to take guidance in these circumstances from a senior member of staff.

Care should also be taken to abide by the Policy on Relationships and Sex Education (RSE) and Health Education and the wishes of parents. Staff should introduce lessons of a sensitive nature with clear guidelines about the parameters within which questions may be asked.

This means that adults should:

- *have clear written lesson plans and teach within the scope and resources identified in the curriculum. Staff must follow the requirement on political impartiality.*
- *think carefully how to introduce lesson/assemblies of a sensitive nature.*

This means that adults should not:

- *enter into or encourage inappropriate or offensive discussion about sexual activity.*

22. Photography, Videos and other Creative Arts

Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement.

Staff need to be aware of the potential for these aspects of teaching to be misused. Using images of children for publicity purposes will require the consent of the individual concerned and their legal guardians. Ordinarily parents sign an authorisation as part of the admission process consenting to the use of photographic images.

Images should not be displayed on websites, in publications or in a public place without the consent of a senior manager.

This means that adults should:

- be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
- ensure that all images are available for scrutiny in order to screen for acceptability
- be able to justify images of children in their possession
- avoid making images in one-to-one situations
- check with the office to ensure that permission has been given for the use of photographic images.

This means that adults should not:

- take, display or distribute images of children or staff unless they have consent to do so from their Line Manager.

23. Internet Use, Filtering and Monitoring

Please follow the school's ICT and Data Protection and Social Networking Policies. Staff must understand their role in filtering and monitoring. [KCSIE](#) includes this responsibility.

Our internet access is provided by LGfL (London Grid for Learning) and we sit behind their firewall. All traffic is also filtered and managed by WebScreen (filtering system) which blocks access to inappropriate websites based on policies that are applied by WMAT. Our email is also scanned by a software called "MailProtect", which provides protection against viruses and spam emails. We have secure Wi-Fi for our internal network.

We use RADIUS server for all devices issued by WMAT. When any visitor is allowed access to our guest network, they can only access the Internet, they do not have access to our internal network. We use SalamanderSoft a system which automatically disables a user account when a they leave the school, thereby protecting access to network from staff or pupil who are no longer part of WMAT.

Smoothwall Filter and Monitoring

- Provides the safest filtering possible – content-aware, 100% real-time filtering protects students all of the time.
- Promotes rich, age-appropriate learning – blocks pages, not sites, to eliminate over blocking and to promote productive online experiences.
- Choice of deployment – available as on-premise, cloud or hybrid deployments.
- The best-in-class web filtering for UK education – Smoothwall Filter is recognised as an Accredited Filter Provider with the UK Safer Internet Centre (UK SIC).

CPOMS

What is CPOMS?

Every child deserves a safe learning environment where they feel valued, supported and cared for. This means ensuring that every child has access to high-quality education and experiences opportunities to develop their potential. CPOMS (Child Protection Online Management System) is the leading provider of student safeguarding software to schools in the UK. It helps record incidents of harm and abuse so that they can learn from past mistakes and prevent future occurrences. It also enables schools to identify trends and patterns of harm and abuse, allowing them to intervene earlier and better support vulnerable pupils.

The CPOMS system

CPOMS is a powerful tool to improve safety and security. It allows schools to keep track of every aspect of their safeguarding policies and procedures and ensure that they are followed by all staff in school. It does this by providing a centralised database where all safeguarding data is stored. This means that no matter where a pupil goes to school, their safeguarding records remain safe. It provides a range of features which allows WMAT schools to manage their safeguarding records efficiently. These include:

- Every institution has its own unique requirements and processes.
- The chronology function provides a timeline view of all the events that have occurred in a student's life. We can see the key details of these events, such as date, location, type of incident, incident timeline, severity, etc. – in a rich visual format. They can also add notes to each event, which can include information such as the reason behind the event, whether it was reported to the authorities.
- CPOMS has automatic integration for SIMS.NET – MIS service providers
- CPOMS provides a secure way to share information between schools, if a pupil transfers to a new school.

24. Informality

Staff have a duty to act at all times as responsible adults. Staff should not speak or act informally with the students. Informality can be considered by the students as a basis for a special relationship. It also means that the member of staff is opening themselves up to allegations of inappropriate conduct by the pupil or his/her parents. Long or frequent conversations with an individual(s) need to be formalised (by writing them up) and seeking the approval of the line manager.

This means that staff should:

- *Act formally*
- *Follow the school's expectations on formal conduct*

25. Radicalisation and Extremism

Staff have a duty to report any concerns that they may have if they believe a pupil is being radicalised. Further details can be found in the Safeguarding Policy.

This means that staff should:

- *Watch out for signs of extremism and radicalisation*
- *Report concerns*
- *Challenge extremist views if expressed in lessons or out of lessons.*

SECTION III

PROFESSIONAL CONDUCT REQUIRED OF STAFF

It is an implicit condition of employment that an employee owes a duty of loyalty to an employer.

1. Teachers as employees

We are responsible:

- We take responsibility for our own aspect of the school and its improvement.
- We define problems and look for a possible solution: we don't moan.
- In the face of difficulty, we remember that we are part of a team: colleagues are there to support us through good and bad.
- We give ourselves time to listen and think.

We are respectful:

- We model respectful relationships with one another.
- We greet each other.
- We are honest: we don't say one thing and think another.
- We make agreements that we intend to, and are able to, keep.
- We presume honourable motives: we remember that in the school context, decisions are made in the best interests of the students.
- In conflict, we talk directly and privately to the person we have a problem with: we don't gossip.

We are confident:

- We are confident in our own abilities as education professionals.
- We praise each other and share our successes.
- We forgive and let go.

2. Teaching – a skilled and trusted profession

All staff will:

- Put the wellbeing, development, and progress of students first.
- Take responsibility for maintaining the quality of their teaching practice.
- Help students to become confident and successful learners.
- Demonstrate respect for diversity and promote equality.
- Strive to establish productive partnerships with parents and carers.
- Work as part of a school team.
- Co-operate with other professional colleagues.
- Demonstrate honesty and integrity and uphold public trust and confidence in the teaching profession.

3. Putting the wellbeing, development and progress of students first

All staff will:

- Ensure that they follow the guidance contained in the [Keeping Children Safe in Education 2025](#).
- Use their professional expertise and judgment to do the best for students in their care.
- Take all reasonable steps to ensure the safety and wellbeing of students.
- Establish and maintain appropriate professional boundaries in their relationships with students, particularly with regard to physical contact, and social media or other contact outside of school.
- Demonstrate self-awareness and take responsibility for accessing help and support in order to ensure that their own practice does not have a negative impact on learning or progress or put students at risk or harm.
- Use appropriate channels to raise concerns about the practice of other teachers or professionals if this has a negative impact on learning or progress

4. Taking responsibility for maintaining the quality of own teaching practice

All staff will:

- Meet the professional standards for teaching relevant to their role and the stage they have reached in their career.
- Develop their practice within the framework of the school's curriculum.
- Base their practice on knowledge of their subject area(s) and specialisms and school pedagogy about teaching and learning.
- Make use of assessment techniques, set appropriate and clear learning objectives, plan activities and employ a range of teaching methodologies and technologies to meet individual and group learning needs.

- Reflect on their practice and use feedback from colleagues to help them recognise their own development needs; actively seek out opportunities to develop their knowledge, understanding, skills and practice.

5. Helping students to become confident and successful learners

All staff will:

- Uphold students' rights and help them to understand their responsibilities.
- Listen to students, consider their views and preferences, including challenging them in decisions that affect them, including those related to their own learning.
- Have high expectations of all students, whatever their background and aptitudes, and challenge and support them all.
- Promote students' confidence and self-awareness by clarifying how assessment will be used to support improvement, providing clear and specific feedback, and celebrating their success.
- Communicate clear expectations about student behaviour to ensure disruption to learning is minimised and students feel safe and secure.
- Help students prepare for the future by engaging them with the implications of changes in society and technology and offering them impartial advice and guidance about careers and their future options.

6. Demonstrating respect for diversity and promote equality

All staff will:

- Act appropriately towards all students and people, parents and colleagues, whatever their socio-economic background, age, gender, identity, sexual orientation, disability, race, religion or belief.
- Take responsibility for understanding and complying with school/WMAT policies relating to equality of opportunity, inclusion and bullying.
- Address unlawful discrimination, bullying, and stereotyping no matter who is the victim or the perpetrator through school/WMAT processes.
- Help create a fair and inclusive environment by taking steps to improve the wellbeing, development and progress of those with special needs, or whose circumstances place them at risk of exclusion or under-achievement.
- Help students to understand different views, perspectives, and experiences and develop positive relationships.
- Support the understanding and enacting of British Values such as democracy, rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

7. Striving to establish productive relationships with parents and carers

All staff will:

- Follow the policies and procedures on communication with parents and carers, including those that relate to sensitive areas such as attendance and exclusion.
- Make sure that when they are speaking to parents they are acting as representatives of WMAT. Staff must not engage in their own personal views. Staff are acting on behalf of WMAT and hence must represent the organisation's position.
- Provide parents and carers with accessible and accurate information about their child's progress.
- Involve parents and carers in important decisions about their child's education
- Consider parents' and carers' views and perspectives, including those that relate to their child's development.

8. Working as part of a team

All staff will:

- Endeavour to develop productive and supportive relationships with all colleagues.
- Exercise leadership and management responsibilities in a respectful, inclusive and fair way, and in accordance with contractual obligations and national standards.
- Uphold policies and procedures and raise any concerns about the running of the school in a responsible and appropriate way.
- Contribute to colleagues' learning and development; provide honest, accurate, and justifiable comments when giving references for, or assessing the performance of, colleagues.
- Participate in continuing professional development and other activities.

9. Expected behaviours when dealing with other professionals or Line Managers

All staff will:

- Seek to understand the roles of other professional colleagues.
- Communicate and establish productive working relationships with other professional colleagues.
- Ensure that they are clear about their own professional contribution to joint working, seeking clarification where this is needed.
- Understand that in sharing responsibility for students' wellbeing and development, staff should always act within their own competence and responsibilities.

- If there are any issues, staff are required to speak to their Line Manager in the first instance (not to anyone else).
- Staff are expected to manage their own emotions as adults.
- Staff are in a position of responsibility and are expected to work through and resolve issues.
- Staff are expected to accept the Line Manager's authority.
- Staff are expected to actively support the school/WMAT, its systems and procedures.

10. Demonstrating honesty and integrity and uphold public trust and confidence in the school

All staff will:

- Exercise their responsibilities in relation to the examination and assessment of achievement and attainment.
- Demonstrate honesty and integrity in management and administrative duties, including in the use of school property and finance.
- Understand that their duty to safeguard students comes first, but otherwise acknowledge the rights of students, families, and colleagues to confidentiality, in line with statutory requirements and school's policies.
- Represent their professional status accurately and not take advantage of their professional status to unduly influence others.
- Maintain high standards in their behaviour and appearance, maintain an effective learning environment and uphold public trust and confidence in the profession.

11. Staff should dress in ways which are appropriate to their role

All staff will:

- Ensure they are dressed appropriately for the tasks and the work they undertake.
- Wear clothing which is appropriate to being a professional and role model.
- Wear clothing which is not likely to be viewed as offensive, revealing, or sexually provocative.
- Wear clothing which does not distract, cause embarrassment or give rise to misunderstanding.
- Wear clothing which is absent of any political or otherwise contentious slogans. Trainers are not allowed.
- Wear clothing which is not considered to be discriminatory and is culturally sensitive.

12. Political neutrality

- Staff have a duty to be politically neutral and are required to be so.
- Staff must not allow their own political opinions to interfere with their work.
- Staff must not display or distribute political materials or act politically on WMAT premises.
- Where political views are brought to the attention of pupils within the school or during extracurricular activities, they must be in the form of a balanced presentation of opposing views and be relevant to the subject being taught.

13. Staff actions (See also Teachers' Standards in Appraisal document)

- Students are not allowed to drink or eat in the corridor or classrooms. Staff are required to set an example and must not carry open cups or drinks or eat in the corridors or classrooms.
- Briefings for staff are formal meetings. No drinks or food are allowed into the venues for these meetings.
- Staff workspace or classroom is a reflection of their professionalism; staff are required to ensure that these are kept tidy and safe. If displays are used staff are asked to ensure that they are of a high quality, up to date and show high standards of students' work.
- Staff absences are monitored and recorded on a daily basis. The *Absence Policy* applies to all staff.
- Staff lateness is monitored, and staff must be punctual at the beginning of the day and to lessons. **Teaching is your first priority;** lateness to lessons is not acceptable. Lessons are expected to start when the bell goes and staff should be ready in their classrooms. Staff are required to make their way to the classroom before the bell rings.
- For safeguarding purposes, staff are required to make sure that they are with their assigned classes as on their timetable and in their designated room. Any requests for changes must be agreed in advance with an LG member and DG notified.
- Missing deadlines, such as deadlines for reports and tracking, is not acceptable.
- Staff have a duty to work within the ICT and data protection policies; this includes not allowing students to use the member of staff's laptop or giving pupils your own login details. Personal information and registers should not be visible to students.
- Staff must not give keys or passes to pupils.
- Pupils should remain in their classrooms for the duration of the lesson. If a pupil needs to leave for any reasons (e.g. illness), they should do so with a note in their Planner (WHTC and NBS) / minor injury sheet (ELPS).
- Staff must not send pupils to the staffroom/workroom or reprographics to collect printing and/or photocopying.

14. Staff's professional boundaries with students and other staff

All of the behaviours in this section are considered to be (gross) misconduct and will lead to disciplinary procedures.

- Staff are required to ensure that they maintain a professional boundary at all times. If the adult-student relationship is breached, it will be dealt with seriously.
- Overly friendly conversations with a pupil or groups of pupils are considered to be professional (gross) misconduct.
- Inappropriate over-sharing of information with students about other members of staff, other students or the school is considered to be (gross) misconduct.
- Confidential conversations carried out in public spaces (such as the staffroom/workroom, corridors, pupil office, in front of others on or off the premises) are similarly considered to be professional (gross) misconduct.
- Criticising or gossiping about other members of staff, students or parents is unprofessional and considered to be (gross) misconduct.

15. Examples of staff conduct which undermines the school/WMAT systems

- Moving classes without permission.
- Not planning lessons properly.
- Not using the correct channels of communication (i.e. not addressing matters through their Line Manager).
- Sending students to the toilets during lesson time, particularly during P1, P3 and P5.
- Not challenging inappropriate behaviour in the corridors.
- Allowing students out of lessons or to roam freely out of supervised areas.
- Calling students back during lunchtime or non-lesson times for social gatherings.
- Holding detentions in the corridor and thereby over-riding the detention systems.
- Dismissing students before the bell.
- Sending students to the staffroom/workroom or reprographic room to pick up printing.
- Inviting or allowing students into the staffroom/workroom.
- Not adhering to the *Feedback and Assessment Policy*.
- Not adhering to the *Homework Policy*.

16. Terms and Conditions relating to hours of work

- Teachers are considered to be full time employees and must not engage in other paid work unless permission has been sought in writing and agreed by the Headteacher/CEO. This includes any other work including private tuition, examining for Exam Boards, etc.

17. Social Networking

- Staff are expected to read and understand the *Social Networking Policy*. It is crucial that they manage their online reputation.
- Staff's professional reputation is an essential part of their current and future career. KCSIE 2025 expects employers to carry out checks on staff's online presence.
- If any staff member(s) place an inappropriate post or image in the public domain which lowers the reputation of the WMAT, a staff member or a pupil, disciplinary action will be taken. It is good practice to follow the practice of never mentioning work, your opinions of your colleagues or processes on your own private Social Media Networks.
- You must be aware that posting information about the school/WMAT cannot be isolated from your working life. Any information published online can be accessed around the world within seconds and will be publicly available for all to see.

18. Data Protection

- The schools in WMAT collect, store, process and retain data relating to their educational functions. Lots of this data is personal, and WMAT takes its obligation with regards to data protection with the utmost seriousness.
- All staff are expected to abide by the *Data Protection Policy* and breach of this policy is a serious disciplinary matter.
- All staff must ensure all personal data relating to pupils, staff and other stakeholders is processed in line with the *Data Protection Policy*. Further details can be found in relevant sections of the Staff Code of Conduct.

19. Artificial Intelligence (AI)

To ensure that the integration of AI aligns with our Safeguarding practices, all staff must:

- **Protect Personal Data:** Staff must not input any identifiable or sensitive personal data into open AI tools. This includes names, medical information, safeguarding concerns, or any data that could compromise privacy or confidentiality.
- **Prevent Exposure to Harmful Content:** Staff must be aware that some AI tools, especially those not approved by the Trust, may produce inappropriate or biased content. All AI-generated material must be reviewed before being shared with students.
- **Monitor for Misuse and Bullying:** AI tools must not be used by students to create harmful, offensive, or targeted content. This includes materials that could constitute bullying, harassment, or the spread of misinformation. Any suspected misuse must be dealt with in line with the school's Behaviour Policy and reported to the DSL where appropriate.
- **Report Safeguarding Concerns:** Any concerns arising from the use of AI such as online threats, inappropriate interactions, or suspected exposure to harmful content, must be reported immediately to the DSL, following normal safeguarding procedures.
- **Model Responsible Use:** Staff must ensure students understand the limitations and risks of AI and promote critical thinking about digital content. This includes discussing AI-related issues such as deepfakes, online manipulation, sustainability, and digital footprints (where age-appropriate).

20. References

A referee is required to give a reference that is accurate and honest. Your future employers will normally expect your Headteacher to be one of your referees. Normally, references will require information on the standard of your work, your diligence, the impact of your work, relationships with colleagues and line managers and your ability to reflect and be flexible. There will be specific requirements around any safeguarding concerns.

SECTION V **SAFEGUARDING INFORMATION FOR ALL STAFF**

Taken from KCSCIE 2025:

WHAT SCHOOL STAFF SHOULD KNOW AND DO

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance *Working Together to Safeguard Children*.
2. Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
 - Providing help and support to meet the needs of children as soon as problems emerge
 - protecting children from maltreatment, whether that is within or outside the home, including online
 - preventing the impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes.

The role of school and college staff

4. School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
5. **All staff** have a responsibility to provide a safe environment in which children can learn.
6. **All staff** should be prepared to identify children who may benefit from early help.¹ Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
7. **Any staff** member who has any concerns about a child's welfare should follow the processes set out in paragraphs 49-55. Staff should expect to support social workers and other agencies following any referral.
8. **Every** school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as local authority children's social care.
9. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
10. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.²

¹ Detailed information on early help can be found in [Working Together to Safeguard Children](#).

² [Teachers' standards](#) - GOV.UK (www.gov.uk)

What school and college staff need to know

11. All staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include the:
 - child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
 - behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying).³
 - staff behaviour policy (sometimes called a code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing
 - safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods and
 - role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one (or Annex A, if appropriate) of this document should be provided to **all** staff at induction.

12. All staff should 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 – see para 140 for further information) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
13. All staff should be aware of their local early help process and understand their role in it.
14. All staff should be aware of the process for making referrals to local authority children's social care and for statutory assessments.⁴ 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 they might be expected to play in such assessments.
15. All staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should 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 designated safeguarding lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
16. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.
17. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead if they have concerns about a child. It is also important that staff determine how best to build trusted relationships which facilitate communication with children and young people.

What school and college staff should look out for

Early help

18. Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

³ All schools are required to have a behaviour policy (full details are [here](#)). If a college chooses to have a behaviour policy it should be provided to staff as described above.

⁴ Detailed information on statutory assessments can be found in [Working Together to Safeguard Children](#) Safeguarding Policy

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour,
- including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Abuse and neglect

19. All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.
20. All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Indicators of abuse and neglect

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

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

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

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.

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos⁵ can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B.

Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

⁵ Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

- i. Child-on-child abuse is most likely to include, but may not be limited to:
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - sexual violence such as rape⁶, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
 - sexual harassment⁷ such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos⁸ (also known as sexting or youth produced sexual imagery)
 - upskirting⁹ 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).

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

- ii. Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an 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. 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.

Child Criminal Exploitation (CCE)¹⁰

- iii. 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.
- iv. Children can become trapped by this type of exploitation, 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. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- v. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be 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.

Child Sexual Exploitation (CSE)

- vi. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing, and touching outside 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.

⁶ For further information about sexual violence see Part 5 and Annex B.

⁷ For further information about sexual harassment see Part 5 and Annex B.

⁸ UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

⁹ For further information about 'upskirting' see Annex B.

¹⁰ See information on CCE definition on page 48 of [Home Office's Serious Violence Strategy](#)

- vii. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.
- viii. 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. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

Domestic Abuse

- ix. 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.

Female Genital Mutilation (FGM)

- x. Whilst **all** staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.¹¹ If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See page 160 for further information.

Mental Health

- xi. **All** staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- xii. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.
- xiii. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to follow their school or college's child protection policy and by speaking to the designated safeguarding lead or a deputy.

Serious violence

- xiv. **All** staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Additional information and support

- xv. Departmental advice [What to do if you're worried a child is being abused: advice for practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout that advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.
- xvi. **Annex B contains important additional information about specific forms of abuse, exploitation and safeguarding issues. School and college leaders and those staff who work directly with children should read Annex B.**

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

What school and college staff should do if they have concerns about a child

xvii. Staff working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best interests** of the child.

xviii. If staff have **any concerns** about a child's welfare, they should act on them **immediately**. A [flow chart](#) setting out the process for staff when they have concerns about a child.

xix. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or a deputy).

xx. Options will then include:

- managing any support for the child internally via the school or college's own pastoral support processes
- undertaking an early help assessment.¹² or
- making a referral to statutory services.¹³ for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

xxi. The designated safeguarding lead (or a deputy) should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or a deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or a deputy) as soon as is practically possible.

xxii. 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 the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). 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. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR).

xxiii. **DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.** If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of

Early help assessment

xxiv. If early help is appropriate, the designated safeguarding lead (or a deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for early help can be found in *Working Together to Safeguard Children*. Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Statutory children's social care assessments and services

xxv. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care and if appropriate the police, (see [when to call the police: guidance for schools and colleges \(npcc.police.uk\)](#)) is made immediately.** Referrals should follow the local referral process.

¹² Further information on early help assessments, provision of early help services and accessing services is in [Working Together to Safeguard Children](#).

¹³ [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include 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 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

xxvi. Local authority children's social care assessments should consider where children are being harmed in contexts outside of the home,¹⁴ so it is important that schools and colleges 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. Additional information is available here: [Contextual Safeguarding](#).

xxvii. The online tool [Report child abuse to your local council](#) directs to the relevant local authority children's social care contact details.

Children in need

xxviii. 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.

Children suffering or likely to suffer significant harm

xxix. 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. This includes all forms of abuse, neglect and exploitation.

What will the local authority do?

xxx. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to 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. [Working Together to Safeguard Children](#) provides details of the assessment process
- 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. [Working Together to Safeguard Children](#) provides details of the assessment process, and
- further specialist assessments are required to help the local authority to decide
- what further action to take.

xxxi. The referrer should follow up if this information is not forthcoming.

xxxii. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or a deputy) as required).

xxxiii. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

xxxiv. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school or college.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

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.

xxxv. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or a deputy).

¹⁴ See [working together](#) for further information about extra-familial harms and environments outside the family home
Safeguarding Policy

Why is all of this important?

xxxvi. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and local child safeguarding practice reviews have repeatedly shown the dangers of failing to take effective action.¹⁵ Further information about local child safeguarding practice can be found in [Working Together to Safeguard Children](#).

Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect
- poor record keeping
- failing to listen to the views of the child
- failing to re-assess concerns when situations do not improve
- not sharing information with the right people within and between agencies
- sharing information too slowly, and
- a lack of challenge to those who appear not to be taking action.

What school and college staff should do if they have a safeguarding concern or an allegation about another staff member

xxxvii. Schools and colleges should have processes and procedures in place to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, volunteers, and contractors).

xxxviii. If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers, and contractors), then:

- this should be referred to the headteacher or principal
- where there is a concern/allegation about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school, and
- in the event of a concern/allegation about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) LADO(s). Details of your local LADO should be easily accessible on your local authority's website.

xxxix. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school or college low-level concerns policy. Further details can be found in Part four of the full version of KCSIE.

What school or college staff should do if they have concerns about safeguarding practices within the school or college

xl. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.

xli. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school or college's senior leadership team.

xlii. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general advice on whistleblowing can be found at [whistleblowing for employees](#)
- the [NSPCC Whistleblowing Advice Line](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – and the line is available from 08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends. The email address is help@nspcc.org.uk¹⁶

¹⁵ An analysis of serious case reviews can be found at [gov.uk/government/publications/serious-case-reviews-analysis-lessons-and-challenges](#)

¹⁶ Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

SECTION VI

CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Taken from KCSIE 2025:

447. This part of the statutory guidance is about how schools and colleges should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and/or online (what to look out for and indicators of abuse are set out in Part one of this guidance). As set out in Part one of this guidance, all staff working with children are advised to maintain an attitude of 'it could happen here', and this is especially important when considering child-on-child abuse.

What schools and colleges should be aware of

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

Schools and colleges should be aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (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

449. Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

450. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers¹⁴.

451. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Sexual violence

452. It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school/college. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹⁵ as described below:

¹⁴ Jones, L et al. (2012) *Prevalence and risk of violence against children with disabilities: a systematic review and meta-analysis of observational studies*. *The Lancet* July 2012.

- **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. (NOTE – Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What is consent?¹⁶

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.¹⁷

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16¹⁸
- sexual intercourse without consent is rape. Further information about consent can be found here: [Rape Crisis England & Wales Sexual consent](#)

Sexual harassment

453. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school or college. 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.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence¹⁹), and

15 [Sexual Offences Act 2003 \(Legislation.gov.uk\)](#).

16 It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way. Further information can be found at [Rape Crisis](#)

17 [PSHE Teaching about consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

18 It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice. 19 [The Voyeurism \(Offences\) Act 2019](#) which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence²⁰. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos²¹. Taking and sharing nude photographs of those aged under 18 is a criminal offence. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges
 - sharing of unwanted explicit content
 - sexualised online bullying o unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

455. It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour

456. Children's sexual behaviour exists on a wide continuum, ranging 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. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously

The Voyeurism (Offences) Act 2019 which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019. Project deSHAME from Childnet provides useful research, advice and resources regarding online sexual harassment. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. 109 between the two. HSB should be considered in a child protection context.

- 457. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre- pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector, and sources are listed in Annex B.
- 458. It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.
- 459. HSB can, in some cases, progress on a continuum²². 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 trauma²³. It is important that they are offered appropriate support.

20 [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

21 Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

22 [NSPCC and Research in Practice harmful sexual behaviour framework](#) discusses the continuum harmful behaviour can progress on (Hackett 2010 continuum model).

23 [Hackett et al 2013](#) study of children and young people with harmful sexual behaviour suggests that two-thirds had experienced some kind of abuse or trauma.

Preventing abuse

460. Effective safeguarding practice is demonstrated when schools and colleges are clear, in advance, about what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. It is important to prepare for this in advance and review this information on a regular basis to ensure it is up to date. As such:

- if required, the designated safeguarding lead (or deputy) should discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the school or college's policies (especially the child protection policy) and responses, and
- the designated safeguarding lead (and their deputies) should be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required. Further information NSPCC and Research in Practice harmful sexual behaviour framework discusses the continuum harmful behaviour can progress on (Hackett 2010 continuum model). Hackett et al 2013 study of children and young people with harmful sexual behaviour suggests that two thirds had experienced some kind of abuse or trauma on specialist support and interventions can be found in Annex B in the additional advice and support section under "sexual violence and sexual harassment".

Responding to reports of sexual violence and sexual harassment

461. Part two of this guidance is clear that systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.

462. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#) (and as summarised in Part two of this guidance).

463. This part of the guidance does not attempt to provide (nor would it be possible to provide) detailed guidance on what to do in any or every case. The guidance provides effective safeguarding practice and principles for schools and colleges to consider in their decision-making process.

464. Ultimately, any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or deputy) taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required.

465. The guidance also provides case studies. These are not intended to offer a step-by-step guide, but to provide an indication of some of the various options that are available to respond to reports of sexual violence and sexual harassment. Support for schools and colleges

466. Schools and colleges should not feel that they are alone in dealing with sexual violence and sexual harassment.

467. Local authority children's social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The designated safeguarding lead (or deputy) should lead the school or college response and should be aware of the local process for referrals to children's social care and making referrals to the police (also see the section "reporting to the police" on page 121 for further information). Schools and colleges may also find the following resources helpful:

- National Crime Agency's CEOP Safety Centre: The CEOP Safety Centre aims to keep children and young people safe from online sexual abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors.
- The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies).
- Support from specialist sexual violence sector organisations such as [Rape Crisis](#) or [The Survivors Trust](#)
- The Anti-Bullying Alliance has developed guidance for schools about [Sexual and sexist bullying](#).

Online: Schools and colleges should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from:

- The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff with regard to online safety issues
- [Internet Watch Foundation](#): If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)
- Childline/IWF [Report Remove](#) is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online
- UKCIS Sharing nudes and semi-nudes advice: [Advice for education settings working with children and young people](#) on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery). Please see footnote 8 for further information
- National Crime Agency's [CEOP Education Programme](#) provides information for the children's workforce and parents and carers on protecting children and young people from online child sexual abuse.
- LGfL '[Undressed](#)' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring 112 them or explaining the motives of sex offenders. Additional sources of support are listed at the end of Annex B.

The immediate response to a report Responding to the report

468. It is important to understand 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 to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

469. The initial response by a school or college to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

470. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

471. As per Part one of this guidance, all staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, preferably one of them being the designated safeguarding lead (or deputy)
- careful management and handling of reports that include an online element. Including being aware of [searching screening and confiscation advice](#) (for schools) and [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). 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 113 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 designated safeguarding lead (or deputy) or local authority children's social care) to discuss next steps. Staff should 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 that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. 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
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- 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-judgemental, 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. It is important to note that whilst 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 written record is made
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

Considering confidentiality and anonymity Confidentiality

472. Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

473. The school or college should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

474. The victim may ask the school or college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purpose is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the designated safeguarding lead (or deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

475. Ultimately, the designated safeguarding lead (or deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

476. If the designated safeguarding lead (or deputy) decides to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

477. Additional information on confidentiality and information sharing is available at [Safeguarding Practitioners Information Sharing Advice and NSPCC: Information sharing and confidentiality for practitioners](#).

Anonymity

478. Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately²⁴. Relevant information can be found in: [CPS: Safeguarding Children as Victims and Witnesses](#).
479. As a matter of effective safeguarding practice, schools and colleges should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.
480. Schools and colleges should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. The unique challenges regarding social media are discussed at paragraph 466 along with potential support. In addition, the principles described in [Childnet's cyberbullying guidance](#) could be helpful.

Risk assessment

481. When there has been a report of sexual violence, the designated safeguarding lead (or deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should 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 or college, 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.
482. Risk assessments should be recorded (paper or electronic) and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect. It is not the role of schools and colleges to provide legal advice or support to victims, alleged perpetrators or parents in respect of a criminal justice process. Rather, schools and colleges should be aware of their own position and responsibilities.
483. The designated safeguarding lead (or deputy) should ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school or college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school or college approach to supporting and protecting their pupils and students and updating their own risk assessment. Action following a report of sexual violence and/or sexual harassment.

What to consider:

484. As set out above, sexual violence and sexual harassment can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools and colleges should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college.

The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school or college. 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 the school or college's duty and responsibilities to protect other children

- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

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

24 It is not the role of schools and colleges to provide legal advice or support to victims, alleged perpetrators or parents in respect of a criminal justice process. Rather, schools and colleges should be aware of their own position and responsibilities