



St Mary's

CE Primary & Nursery School

Where Every Day Matters & Everyone Counts

Safeguarding and Child Protection Policy 2025



Policy reviewed	August 2025	<p>Updated in line with KCSiE 2025</p> <p>Safeguarding Statement: inclusion of ‘harm’.</p> <p>Roles & Responsibilities – Headteacher: reference to Martyn’s Law and EYFS.</p> <p>Professional Development: Statutory training recorded on iAm Compliant.</p> <p>FGM Training: to be completed by EYFS staff.</p> <p>Changed to statutory training requirements e.g. Prevent annually.</p> <p>Whistleblowing: Updated NSPCC guidance.</p> <p>Reference to CPOMS Toolkit.</p> <p>Reference to: Shropshire Transition in Education Guidance (safeguarding children at educational transition points) Shropshire Learning Gateway to guide our practice approach.</p> <p>RSHE programmes are compliant with Relationships and sex education (RSE) and health education - GOV.UK.</p> <p>Each school is directed to the DfE’s Plan technology for your school - GOV.UK. This tool can be used to self-assess against the filtering and monitoring standards and receive customised recommendations on how to meet these standards.</p> <p>How you ensure the safe use of generative AI (see Safe use of generative AI in education: module 3 - GOV.UK)</p> <p>Alternative Provision Checklist – Appendix 1 - updated</p> <p>If there are concerns that a child’s mental health needs may place them at risk of harm (for example concerns about suicidal ideation or attempts, self-harm, eating disorders etc); then staff will adhere to Staff Safeguarding Concerns: Recognise, Respond, Report.</p>
Date approved by Trustees	January 2026	<p>P4: Specific Forms of Abuse and safeguarding issues – added in for ease of access.</p> <p>Appendix B: Child-on-child abuse procedures: Full list (rather than a hyperlink) of types of child-on-child abuse as outlined in KCSiE 2025 Part 1 added.</p> <p>Appendix H: Specific forms of abuse and safeguarding issues as outlined in Annex B added in for ease of access.</p> <p>Online Safety Changed from summary of 4C’s to full wording as written in KCSiE 2025.</p>
Next review date	March 2026	<p>Strengthened Preventing Radicalisation and added in Prevent Risk Assessment Template (appendix I) to streamline where information is accessed.</p>
	August 2026	

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Policy Scope and Aims

This policy applies to anyone working in an Empower Trust school or within Empower Trust, including senior managers and the board of trustees/governing body, staff, volunteers, contractors, agency staff and students.

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

The policy aims to meet the requirements as outlined in Part 2 [Keeping children safe in education](#) and Part 3 [EYFS statutory framework for group and school-based providers](#).

Safeguarding Statement

We believe that:

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

This means that we will:

- Not tolerate the abuse, neglect or exploitation of children. This includes never accepting and always challenging or raising concerns about words or actions which downplay, justify, or promote abuse, neglect, exploitation and/or harm. This applies to anyone who is part of, comes into or works with our school.
- Be child centred¹ and ensure that we consider the best interests of children in everything that we do. This includes ensuring that we enable children's voices and experiences to be heard (using communication tools and advocacy if necessary); and that children are involved in and informed about the decisions being made about them.
- Ensure we provide a safe environment for children to learn, grow and develop and feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse, neglect, exploitation and/or harm of a child.
- Ensure no child or group of children are treated less favourably by us than others.
- Be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of a child(ren) who we know are more vulnerable to experiencing abuse, neglect, exploitation, harm or discrimination.
- Work in partnership with our children, their parents, carers, and other agencies.

Key Terms

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children 2023 as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether this is within or outside of the home, including online.
- preventing impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes²

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

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

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

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

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experiences 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 another child or children.

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

Specific forms of abuse and safeguarding issues:

- child abduction and community safety incidents
- child criminal exploitation [CCE] and child sexual exploitation [CSE]
- county lines
- children and the court system
- children who are absent from education
- children with family members in prison
- cyber crime
- domestic abuse
- homelessness
- mental health
- modern slavery and national referral mechanism
- preventing radicalization
- the prevent duty and Channel
- sexual violence and sexual harassment between children in schools and colleges
- serious violence
- honour based abuse
- FGM
- FGM mandatory reporting duty for teachers
- forced marriage

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

Governors/Trustees refers to those who are part of the Schools' Governing Body. This includes individuals who are at Trustee level as well as part of local school governance bodies.

Child includes everyone under the age of 18.

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

³ S576 Education Act 1996

Legislation, Standards and Guidance

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

Legislation	Statutory National Guidance/Standards	Local Procedures
<ul style="list-style-type: none"> • Education Act 2002 Section 175 (maintained schools only) • Education Act 2002 Section 157 (Independent schools incl Academies and CTC's) • The Education (Independent School Standards) (England) Regulations 2003 • Children Act 2004 	<ul style="list-style-type: none"> • Keeping Children Safe in Education and any legislation or guidance (statutory/non-statutory) outlined or referenced within it. • Early years foundation stage (EYFS) statutory framework • Working Together to Safeguard Children and any legislation or guidance (statutory or non-statutory) outlined or referenced within it. 	<ul style="list-style-type: none"> • Shropshire Safeguarding Community Partnership West Midlands Safeguarding Children Procedures • Shropshire Safeguarding Community Partnership Threshold Guidance • Shropshire Safeguarding Community Partnership. Allegations about staff/volunteers

Linked Policies

<ul style="list-style-type: none"> • Behaviour/Anti-Bullying Policy /Physical Intervention • Staff Code of Conduct • Whistleblowing • Health & Safety • Attendance • PSHE Curriculum(s) • RSHE • Complaints • SEND • Remote Learning Policies (individual to each academy) • Mobile Phone Policy 	<ul style="list-style-type: none"> • Administration of first aid/medicines • Supervision Guidance • Online Safety, including staff use of mobile phones/ devices with imagery and sharing capacity. • Risk Assessments • Safer Recruitment • Disciplinary and grievance • Intimate Care • Preventing Radicalisation • Data Protection/GDPR Guidance • CPOMS Toolkit
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Roles and Responsibilities

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

The Trustees, Local Governing Bodies, Central Team:

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

[The Safeguarding Trustee](#) is responsible for leading on the governance oversight of safeguarding arrangements across the whole of the Trust; regularly meeting with the Director of Education/Strategic Lead for Safeguarding on a termly basis and reporting back to the Trustees through a written report.

[The Safeguarding Governor at each academy school](#) is responsible for leading on the governance oversight of safeguarding arrangements for their school; regularly meeting with the Designated Safeguarding Lead on a termly basis and reporting back to the Local Governing Body through a termly reporting format.

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

All Governors/Trustees will ensure:

- The school has a Designated Safeguarding Lead who has the appropriate status and authority to carry out duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- The school has safeguarding policies and procedures in place (as outlined in Part 2 Keeping Children Safe in Education) that are implemented effectively and comply with our duties under [Legislation, Standards and Guidance](#) at all times.
- All staff and governors are knowledgeable and confident in carrying out their safeguarding duties in line with [Professional development and support](#).
- That the effectiveness and implementation of safeguarding arrangements are robustly overseen by the Governing Body/Trustees/Central Team by Termly meetings with the DSL/DOE via reports to each local governing body; audits that comply with local authority guidance; annual safeguarding audits for each Academy school and external review for each academy school biennial.

The Headteacher:

Is responsible (with the lead support of the Designated Safeguarding Lead, where the Headteacher is not the Designated Safeguarding Lead) for ensuring safeguarding arrangements are implemented effectively in school.

This includes:

- Having the overarching responsibility of ensuring the effectiveness of their academy school safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the Governing Body (with the support of the Designated Safeguarding Lead) on the effectiveness of school safeguarding arrangements.
- Supporting and promoting a whole school safeguarding culture and ethos as outlined in our [Safeguarding Statement](#). This includes ensuring that the Senior Leadership Team work effectively together and with the Designated Safeguarding Lead, to ensure a whole school approach to safeguarding.
- Take the lead role in [Ensuring Safe Practice](#); including ensuring staff are knowledgeable and confident in their safeguarding practice; including making sure that their practice is in line with national and local requirements. The Headteacher is also the lead person responsible for receiving, managing, and referring to/liasing with the Local Authority Designated Officer (with the support of the Designated Safeguarding Lead) or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the Designated Safeguarding Lead/Deputy Designated Safeguarding Lead to carry out their roles effectively. This means ensuring they are given sufficient time, training, support, resources, including cover arrangements where necessary.
- Ensuring that all school policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff.
- Ensuring that school policies relating to site safety and health and safety guidance and relevant legislation are in place, implemented and followed by all staff.
- Safer eating and Paediatric first aid requirements as set out in part 3 of EYFS
- Schools should also be taking steps to prepare for the statutory requirement (as outlined in Terrorism (Protection of Premises) Act 2025: aka "Martyn's Law) to mitigate the impact of a terrorist attack and reduce harm in the event of an attack occurring

The Designated Safeguarding Lead (DSL):

Takes the lead responsibility for safeguarding and child protection in each academy school. Annex C [Keeping children safe in education](#) outlines their key responsibilities. Where academy schools have Deputy Designated Safeguarding Lead(s) (hereafter referred to as DDSL), they support the Designated Safeguarding Lead in the discharge of their responsibilities.

Responsibilities include:

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

All staff (including students and volunteers):

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

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

Professional development and support

To ensure all our staff and governors are knowledgeable and confident in keeping children safe in our school; they will complete the professional development activities as outlined below. Each academy school monitors professional development activities and maintains a central professional development record, which is shared with the Central Team as required. Statutory training is recorded on iAm Compliant.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s) provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal and performance processes in school, including annual updates. The Designated Safeguarding Lead (and deputy(ies)) receive regular support and supervision at a school level and Trust Supervision Guidance is available to support this.

All Staff (including volunteers)

Activity	Frequency
Receive information on school safeguarding arrangements and procedures as outlined in Keeping children safe in education	Induction or when arrangements/procedures are updated.
Read Keeping Children Safe in Education (KCSiE): <ul style="list-style-type: none"> • All Staff: Part 1; Part 5 and Annex B. • Senior Leadership Team: Entire document • Staff who do not work directly with children: Annex A • EYFS: Part 3 of EYFS 	Induction then annually (in Autumn Term) or when updated.
Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns (see <i>Local Authority Safeguarding in Education Training Statement at: Early Years and Schools Training and Consultancies Shropshire Learning Gateway</i>)	Induction and then every 2 years
Teaching staff and Early Years Staff: Complete FGM training appropriate to role at: Free FGM Training Online Recognising & Preventing FGM Free Course Virtual College (virtual-college.co.uk) Female genital mutilation - GOV.UK (www.gov.uk)	Induction and then every 2 years
Complete Prevent Awareness Training appropriate to role at: Prevent duty training - GOV.UK (www.gov.uk)	Induction and then annually.
Complete Cyber Security Training at: Cyber security training for school staff - NCSC.GOV.UK	Induction and then annually
Receive regular national and local safeguarding updates (including those relating to online safety) - to help maintain basic skills and keep up to date with any changes to safeguarding procedures or as a result of any safeguarding concerns that occur in the setting	As required; at least annually. Termly Safeguarding Update from Trust.

Designated Safeguarding Leads (including any deputies)

Activity (in addition to all staff above)	Frequency
Complete Schools Designated Safeguarding Lead Training to a standard as outlined in KCSiE Annex C	On induction in role and then every 2 years
Read Keeping Children Safe in Education in its entirety.	Induction into role then annually (in Autumn Term) or when updated.
Maintain knowledge and development relating to the role of DSL (include whether DSL's complete any Early Help/Brook Traffic Light Tool/Other relevant training)	As required, but at least annually
Complete Prevent Training appropriate to role (see examples of training packages at: The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk) and DSL specific packages (including EYFS and Independents) at Regional Prevent education co-ordinators - GOV.UK)	On induction and then every 2 years

All Governors and Trustees

Activity	Frequency
Complete Governor Safeguarding Training to equip them with the knowledge to carry out their strategic Roles and Responsibilities .	Induction and then every 2 years.
Read Keeping Children Safe in Education <ul style="list-style-type: none"> • All Governors/Trustees: Part 1; Part 2 and Annex B. • Chair & Safeguarding Link Governors: Entire document 	Induction into role then annually (in Autumn Term) or when updated).
Complete Cyber Security Training at: Cyber security training for school staff - NCSC.GOV.UK	Induction and then annually
Complete Prevent Awareness Training appropriate to role at Prevent duty training - GOV.UK (www.gov.uk)	Induction and every 2 years.

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

Activity (in addition to other relevant above)	Frequency
Read Part 3: Keeping Children Safe in Education	Induction into role then annually (in Autumn Term) or when updated.
Complete appropriate safer recruitment training (that is in alignment with Part 3 KCSiE) Safer Recruitment Free Online Course Alison Training also available on Governor Hub: Safer Recruitment	Induction and every 3 years (or when KCSiE Part 3 is updated)

Ensuring Safe Practice

Safer recruitment

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

As part of our recruitment and selection processes; we ensure that our commitment to safeguarding and promoting the welfare of children is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. Reference to safeguarding procedures is made clear in adverts and application packs. We also ensure that all applicants complete a robust application form. We seek suitable references and carry out online social media checks prior to interview; as well as ensure that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

In accordance with Keeping Children Safe in Education 2024: Part 3; we maintain a record of information we have received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students); Governors/Trustees; [contractors](#); and [visitors](#) who attend our school in a professional capacity. We complete the checks on staff, volunteers, and Governors/Trustees who we recruit ourselves. For those who are recruited by others; we ensure that we receive written confirmation of the relevant checks completed and check their identification before they are allowed to work unsupervised or engage in regulated activity with children.

Where we do not have all the necessary information or there are gaps in the information; we have robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks suitability does not work unsupervised or engage in regulated activity with children and any employment prior to all checks will be agreed by the CEO. We reserve the right to refuse access to the school site any person who we are not assured is safe to work or engage in regulated activity with children.

On appointment; staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of school. Please see [Professional development and support](#).

If any safeguarding concerns of allegations arise relating to a member of staff, Governor/Trustee or other person working on our school premises; staff are expected to act in line with [Ensuring safe staff](#) and [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

Contractors

We have several contracts with external providers to work in our Trust including with children. Where contractors are used, they are approved by the Local Authority or Trust and a record of their checks is kept by the Trust and each school they work in.

Visitors

We have procedures for recording the details and confirming the identity of visitors, including prospective candidates. We ensure that we have control over who comes into the premises so that no unauthorised person has unsupervised access to children.

All visitors to our school are expected to act in accordance with our [Safeguarding Statement](#).

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

Further guidance and support can be found: [Educate Against Hate advice on hosting external speakers](#).

Use of school premises for non-school activities

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

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

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

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

Ensuring safe staff

Managing allegations (including low level concerns)

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

There are two levels of allegations / concerns:

1. Allegations that may meet the harm threshold.

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

- behaved in a way that have harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have occurred outside of the school that could pose a transferable risk.

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

If the allegation relates to the Headteacher; this should be immediately verbally reported to the Chair of the Local Governing Body and/or CEO.

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

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

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

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

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

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

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the harm threshold at point 1 above.

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

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

Whistle Blowing

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

If staff have such concerns; these should be raised to DSL or Headteacher referring to the Trust Whistleblowing Policy.

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

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

Record Keeping and Information Security

We have a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). We have data protection processes in place to ensure that we keep and process (manage) personal information about children, their families; staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with [Meeting digital and technology standards in schools and colleges](#)(see also [Online Safety](#))
- Manage requests for access to personal information we hold (known as subject access requests).

Details of our processes and how to request access to personal information we hold are outlined in the [GDPR and Data Protection Policy](#).

Storage and management of safeguarding information (child protection files)

Safeguarding [concerns](#) and [responses](#) for individual children are stored on CPOMS at each academy school. This has two factor authentication for added security. Where there are historic paper copies, these are stored in a child protection file. Child Protection files are stored individually for each child and are separate to a child's main pupil file. The Designated Safeguarding Lead is responsible for ensuring the quality, maintenance, and management of child protection files; as well as using the system to monitor themes and patterns of concern to inform and continue to improve the whole school approach to safeguarding. The CPOMS toolkit outlines to processes used across the trust.

Sharing safeguarding information with others

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

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

Sharing information with other organisations

Staff should be familiar with and use [Information sharing advice for safeguarding practitioners](#).

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

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

If a parent or child does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a child safe and promoting their welfare. Therefore, staff must make parents and children aware that information may still be shared with other organisations if necessary to help keep their child safe or promote their welfare or if there is another legal basis to do so.

Decisions to share safeguarding information with other organisations will be overseen by the Designated Safeguarding Lead (please also refer to [Designated Safeguarding Lead Response](#)). The Designated Safeguarding Lead will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including rationale for those decisions. This should include instances where referrals have or have not been made to another agency.

Transfer of child protection files and other safeguarding information

When a child leaves for a new education setting; the Designated Safeguarding Lead will arrange for the child protection file (and any additional information to help the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting no later than within 5 working days of an in-term transfer or within 5 days from the start of the new term. Where the move is planned; the Designated Safeguarding Lead will consider sharing information in advance of the child leaving to help with the child's transition and to enable any help and support they may need.

We will use the [Shropshire Transition in Education Guidance \(safeguarding children at educational transition points\) | Shropshire Learning Gateway](#) to guide our practice approach.

This is shared separately to any child's main file and confirmation of receipt of the files should be gained ([Appendix C: File Transfer Record and Receipt](#)).

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

Working in Partnership

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

Children

Our children are [taught how to keep safe](#); including how and when to share or report to us any worries or concerns they have about their safety and wellbeing or that of others. We encourage children to share and report worries and concerns in a variety of ways across our academy schools, this includes, but is not limited to:

- Speaking to any member of staff
- Telling a 'trusted adult' (this may also include family members)
- Use worry monsters/boxes
- Circle time
- Pastoral support

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

We also actively seek children's views of safety in academy schools through using some of the following methods:

- Pupil voice questionnaires
- PSHE and RSHE lessons
- Pupil interviews
- Safer Schools Questionnaire
- Children's Safeguarding Boards
- School Councils

Parents

We recognise the importance of working together with and supporting parents to safeguard and promote the welfare of their children.⁴ This includes:

- In EYFS Meeting with parents prior to children starting to request information relating to the child's routines, likes and dislikes, special dietary requirements, intolerances/ allergies and allergy action plans and requesting parents inform us of any changes to these throughout the year.
- Communicating to parents how we keep children safe in our school (including online). This policy is made available to all parents on each academy school website and on the Trust website. If parents want to raise concerns or complaints about how we keep their children safe; they can do this using our Complaints Policy which is available on our website. We also actively seek parent views of safety in academy schools through some of the following methods:
 - Open door policies
 - Parent questionnaires
 - Feedback from parent sessions/workshops
 - Safer Schools Questionnaire
- Encouraging parents to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. We do this by encouraging parents to raise any concerns as soon as possible with the class teacher, if this does not resolve the concern then the complaints policy can be followed. Staff are expected to respond to any parents who raises worries or concerns to them either about their child(ren) or others in line with [Staff Safeguarding Concerns: Recognise, Respond, Report](#) .
- The Designated Safeguarding Lead will ensure that we work with parents to offer and enable support for children and their families; taking action to safeguard and promote their welfare (see [Designated Safeguarding Lead Response](#)) in line with the local arrangements in the area that they live.
- Ensuring that parents are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority and/or Enforcement Agencies. We do this by giving contact details to parents or other concerned members of the community so that they know have the relevant information and contact details.
- Providing parents with regular information, guidance and external support available to them by
 - Newsletters
 - Online Safety Newsletters
 - Pages on our website
 - Signposting e.g. to Early Help, Family Information Service
 - Running sessions for parents e.g. Understanding Your Child

Other agencies/partnerships

⁴ Outlined in [Working Together to Safeguard Children Chapter 1: Principles for working with parents and carers](#)

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

- Ensuring we effectively safeguard and promote the welfare of children living in Shropshire in line with [Working together to safeguard children](#) and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the [SSCP Threshold Document](#). Where children do not live in Shropshire but attend our school; we will work in line with the relevant local arrangements in their home area.
- Ensuring we work with other agencies and comply with other pieces of relevant statutory guidance in safeguarding [Children potentially at greater risk of harm](#).
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
- Working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure we are providing high quality education and support to children in Shropshire.
- Participating in the local [Operation Encompass Protocol](#); an arrangement where police notify schools when a child who attends their school may have been subject or witness to police-attended incidents of domestic abuse. This enables us to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of our participation in Operation Encompass ([School Operation Encompass – Shropshire Learning Gateway \(shropshirelg.net\)](#)).

Teaching our children how to keep safe.

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

- [Safeguarding Statement](#)
- Behaviour/Anti-Bullying Policy (see trust/school websites)
- [Preventing Radicalisation](#)
- Our approach to [Online Safety](#)
- Our Personal Social Health and Education and Computing curriculum and policies, including our RHE /RSHE Policies. The RSHE programme at each academy school is developed to be fully inclusive of all ages and stages of development and consideration of children's needs including [Children potentially at greater risk of harm](#); and addresses issues as outlined Keeping Children Safe in Education 2024; Part 2: Opportunities to teach safeguarding. RSHE programmes are compliant with [Relationships and sex education \(RSE\) and health education - GOV.UK](#).

The DSL, *RHE/RSHE lead* and other key Leaders and members of the SLT (such as computing, Mental Health and SENDCo) in each school academy will work collaboratively to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in school.

Online Safety

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

Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in school when using internet enabled technology; which are summarised in the following categories⁵:

⁵ Examples of what could be included in the categories is further detailed in [Keeping Children Safe in Education 2024 \(Part 2\)](#)

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

We adopt a whole school approach to online safety which aims to safeguard and educate our children and their families, staff, visitors and our school in our use and management of ICT (including the use of camera enabled; mobile and personal devices and the ICT systems we have in place). Our [online safety policy](#) outlines our approach, including:

- The expectations for staff, Governors, children, and visitors in use of camera enabled; mobile and personal devices and the ICT systems.
- Acceptable Use Agreements are included as appendices.
- Arrangements for filtering and monitoring and cyber security (including staff responsibilities and training: see also [Professional development and support](#));
- Adheres to the digital standards for [filtering and monitoring](#) and [cyber security](#) requirements.
- Mobile phone and camera enabled procedure (appendix G). Where schools have early years setting, all electronic devices with imaging and sharing capabilities, will all be treated in the manner of mobile phones.
- [Safeguarding children and protecting professionals in early years settings: online safety considerations - GOV.UK \(www.gov.uk\)](#)
- Each school is directed to the DfE's [Plan technology for your school - GOV.UK](#). This tool can be used to self-assess against the filtering and monitoring standards and receive customised recommendations on how to meet these standards.
- How you ensure the safe use of generative AI (see [Safe use of generative AI in education: module 3 - GOV.UK](#))

Where there are online safety concerns involving identified children (including child-on-child abuse); we will follow [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Safeguarding Response](#).

Any school cyber security incidents will be reported to [Action Fraud \(National Fraud and Cyber Crime Reporting Centre\)](#) and, if there is a data breach this will be reported in line with our Data Protection Processes to the [Information Commissioners Office](#). Please also see [Record Keeping and Information Security](#).

Where children are being asked to learn online at home, we follow advice from the Department of Education; [Safeguarding and remote education](#). Our approach to remote learning is outlined in our Remote Learning Policy.

We review our online safety arrangements annually to ensure that we meet the Keeping Children Safe in Education online safety standards (including the digital standards for [filtering and monitoring](#) and [cyber security](#)). Any risks arising from our reviews are clearly recorded as part of our school evaluation and improvement action planning processes. These are reported to and overseen by our Governing Body.

All Staff, senior leaders and Governors are appropriately trained (see [Professional Development and Supervision](#)) to enable them to ensure effective online safety arrangements. We will respond to online safety incidents which indicate safeguarding concerns in line with the [Staff Safeguarding Concerns: Recognise, Respond, Report](#) and [Designated Safeguarding Lead Response](#) sections of this policy.

Preventing Radicalisation

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

We have [Prevent Duty Policy](#) in place which outlines how we fulfil this duty.

We fulfil our duty by:

- Promoting fundamental British Values as part of our values and curriculum in each academy school.
- Ensuring the school is a safe space in which pupils can understand and discuss sensitive topics, including terrorism and extremism, and are able to challenge these ideas.
- Be alert to and identify children who may be [susceptible to radicalisation into terrorism](#) and where it is assessed as appropriate by the [Designated Safeguarding Lead](#); make a Prevent referral (in line with the local [Preventing Terrorism Processes](#))
- Monitor and report any hate based behaviour as part of our Behaviour and Child-on-Child Abuse Policies (Hate related incident reporting processes can be found [here](#)).
- Outline in our Online Safety how children are being safeguarded from being drawn into terrorism (see [Teaching our children how to keep safe](#))
- Ensure that hosting external speakers or visitors that attend our school premises are suitable and appropriately supervised (please also refer to [Visitors](#))
- Assess the risk of our children being drawn into terrorism, ensuring this is informed by the potential risk in the local area.

Each academy school completes a Prevent risk assessment ([Appendix I](#)) specific to their local context, which is reviewed at least annually and updated when risks change. The risk assessment and any actions arising from it are reported to the Local Governing Body as part of the termly safeguarding update (for information and local oversight) and to the Director of Education/Strategic Lead for Safeguarding. The Safeguarding Trustee receives an annual reports on Prevent duty compliance across all academies and reports to the Trust Board, which holds statutory accountability for ensuring the trust meets its Prevent duty obligations.

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

Children potentially at greater risk of harm

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

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

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

Empower Trust schools work with a range of other agencies including statutory safeguarding partners to support vulnerable children through:

- Attendance at Strategy Meetings
- Attendance at Core Group/Conference Meetings

- Hosting meetings within the academy schools, facilitating meetings for individual children and families to support easier local access
- Accessing multi-agency training
- Early Help/Early Help Area Network Meetings
- Working with partners to host training events for parents
- Family Information Service

Looked After Children and previously looked after children.

The most common reason for children becoming looked after is as a result of abuse and/or neglect; as well as/or other significant complexities or adversity in their and their family's life.

At school/setting, we ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements. School/setting has an appointed designated teacher who works with the local authority to promote the educational achievement of registered pupils who are looked after in line with Statutory guidance - Designated teacher for looked-after and previously looked-after children.

Children who attend Alternative provision

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

Our schools support this by ensuring safeguarding arrangements at any Alternative Provision that we commission are effective and compliant with Keeping children safe in education (Part 2) and Alternative Provision Department for Education.

A checklist for Alternative Provision can be found Appendix 1.

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

All children aged 5-16 are legally entitled to a full-time education, suitable to any special education need. Education is essential for children's progress, wellbeing and wider development and being in school is a protective factor against wider harms, including exploitation.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect (including Educational Neglect) or child exploitation; as well as other needs. Our response to persistently absent pupils and children who are absent from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

Some of our policies and procedures for absence include:

- Establishing a range of evidence-based interventions to address barriers to attendance.
- Monitoring the implementation and quality of escalation procedures and seek robust evidence of the escalation procedures that work.
- Attend or lead attendance reviews in line with escalation procedures.
- Establish robust escalation procedures which will be initiated before absence becomes a problem by:
 - Sending letters to parents.
 - Engaging with Education Welfare Officer.
 - Using fixed penalty notices.
 - Working with Early Help and other agencies.

Unauthorised absence includes:

- Parents keeping children off school unnecessarily or without reason
- Truancy before or during the school day
- Absences which have never been properly explained
- Arrival at school after the register has closed
- Absence due to shopping, looking after other children or birthdays
- Absence due to day trips and holidays in term-time which have not been agreed
- Leaving school for no reason during the day
-

When a school has had to put an absence as unauthorised, the following procedures can be used:

- Contact via phone/email/text message etc
- Home visits
- EWO support where a pattern emerges
- Parent meetings
- Absence actions plans

Persistent absence is when a child's attendance is at 90%. There are various groups of pupils who may be vulnerable to high absence and PA, such as:

- Children in need
- LAC
- Young carers
- Pupils who are eligible for FSM
- Pupils with EAL
- Pupils with SEND
- Pupils who have faced bullying and/or discrimination

Each academy school will use a number of methods to help support pupils at risk of PA to attend school. These include:

- Offering catch-up support to build confidence and bridge gaps.
- Meeting with parents to discuss patterns of absence, barriers to attendance, and any other problems they may be having.
- Establishing plans to remove barriers and provide additional support.
- Leading regular check-ins to review progress and the impact of support.
- Making regular contact with families to discuss progress.
- Assessing whether an EHC plan or IHP may be appropriate.
- Considering what support for re-engagement might be needed, including for vulnerable groups.

Each academy school will use attendance data to develop specific strategies to improve attendance where patterns of absence are emerging. These strategies will be developed on a case-by-case basis and will consider the particular needs of the pupils whom the intervention is designed to target.

Each academy school has an attendance page on the school website.

We have policies in place; that are in line with associated statutory guidance and [Shropshire Council Education Access Service Local Processes](#) including:

- Attendance Policy
- Children with health needs who cannot attend school

- Early years attendance guidance [Early Years and Schools Safeguarding Policies and Guidance | Shropshire Learning Gateway \(shropshirelg.net\)](#)

Children who are Electively Home Educated.

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. When a parent notifies us that they wish to deregister their child to electively home educate them, we will immediately notify the local authority.

When a parent has expressed their intention to remove a child from school, with a view to educating at home, academy school may:

- Arrange a meeting with parents to discuss whether this is in the best interests of each child.
- Refer to [DfE Elective home education guidance](#) and [Shropshire Council processes and protocols](#).
- Complete Local Authority Paperwork, including any important information, for example where a child has special educational needs or disability, and/or has a social worker and/or otherwise vulnerable.
- Complete a follow up letter to parents outlining the content of any meeting and the follow up procedures the school has taken.

Children who have experienced multiple suspensions and are at risk or, or have been permanently excluded

It is important that children in each academy school know and understand how we expect them to behave and we ensure that each school is a safe place where all children feel safe and are able to learn. Serious, harmful and/or repeated behaviour by children will always be responded to. Such behaviour can be a sign or indicator that a child has an unmet need or could indicate that they are at risk of or are experiencing/have experienced abuse, neglect, exploitation or some other form of adverse experience⁶ in their life.

Our Behaviour Policy outlines the expected standards of behaviour for our children; as well as how schools will support and respond to children with additional needs (including Special Educational Needs and Disabilities), or whose needs or circumstances might affect their behaviour. Where a child's behaviour also indicates a safeguarding concern; staff will adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

Children requiring Mental Health Support

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Children who have mental health needs will often need early help or support to avoid their safety and welfare being compromised. If there are concerns that a child's mental health needs may place them at risk of harm (for example concerns about suicidal ideation or attempts, self-harm, eating disorders etc); then staff will adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

Some of the systems and processes academy schools have in place for identifying possible mental health problems include:

- Pastoral support e.g. ELSA trained staff; Zones of Regulation
- PSHE
- Mental Health and Wellbeing Policies
- Mental Health Leads
- External support e.g. play therapist, Mental Health Support Worker
- BEAM

⁶ See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

Children with Special Education Needs Disabilities or other health issues.

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

We recognise that additional barriers can exist when recognising abuse and neglect in this group of children (e.g. assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration).

Some of the systems and processes academy schools have in place to identify additional pastoral support and attention for children with SEND include:

- 'A Day in the Life of'
- A consistent, Trust wide approach to SEND documentation
- Working with Trust SENCo and SEND Strategic Lead to ensure that the best practice and provision for each individual child is in place
- High quality training and support for staff working with children, liaising with external agencies where needed
- Regular Trust wide SENCO meetings to support across schools
- Due regard to [SEND code of practice](#) and [The SEND local offer | Shropshire Council](#) and [Education for children with health needs who cannot attend school](#).

Children who are lesbian, gay, bisexual or gender questioning⁷

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

Some of the systems and processes academy schools have in place to reduce additional barriers faced by children in this group include:

- Work and discussions around protected characteristics
- Use of resources, that are age appropriate, that allow for discussion e.g. 'And Tango Makes Three'; Picture News
- Following advice and guidance from [Equality Act 2010: advice for schools](#).
- Including this group in anti-bullying policies

Child-on-Child Abuse

As set out in our [Safeguarding Statement](#); we will not tolerate the abuse of children. This includes where children abuse other children (child-on-child abuse) or use words or actions which downplay or could (if not responded to) lead to abuse.

We want to ensure that no child-on-child abuse takes place in our school. However, we understand that we cannot just rely on children telling us that they are experiencing abuse from other children. Staff should understand that even if there are no reports in school, this does not mean child-on-child abuse is not happening. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their [Professional Development and Supervision](#); which do not just rely upon children telling someone. Staff are expected to follow our [Appendix B: Child-on-Child Abuse Procedures](#)

The school monitors patterns of child-on-child incidents including those involving abuse, to ensure that we are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps us to continue to

⁷ Gender questioning is the term used in line with Keeping Children Safe in Education 2024: Part 2: Children potentially at greater risk of harm. It describes children and young people who are in the process of understanding their gender identity ([Cass Review: 2024:19](#))

prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and our responses to it are reported to and overseen by our Governing Body.

Staff Safeguarding Concerns: Recognise, Respond, Report

Recognise

Be alert and curious!

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

Appearance

Behaviour

Communication.

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

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

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

As well as maintaining their [Professional development and accessing support](#); staff can remind themselves of the signs and indicators of abuse/harm and safeguarding issues by referring to: [Keeping Children Safe in Education 2024](#): Part 1 and Annex B. and [SSCP - Contacts and Definitions](#).

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

- Appearance
- Behaviour
- Communication

Signs and indicators can be recognised by staff through:

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

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

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

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

There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse. Signs and indicators could be present for a variety of reasons as well as abuse

(for example other family circumstances; health or learning needs); and may act as an early sign for the need for early help and support. In such circumstances; staff are still expected to respond in line with this policy.

Respond

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

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

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

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

Immediate safety

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

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves (follow [Multi-agency Referral: Reporting concerns \(MARF\)](#))
- Work in line with our Behaviour Policy and [Use of reasonable force in schools](#) guidance.
- Report any allegations of harm by adults in a position of trust or unsafe practices in school in line with the [Ensuring safe staff](#).

Other relevant policies/processes

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

Injuries

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

We use body maps to record information about physical injuries to a child as part of our first aid/safeguarding concern reporting processes.

Seek views and gather information from the child and others.

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

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

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

Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to [When concerns are directly shared by a child](#).

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

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

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

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

If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through their behaviour and use communication tools to help the child share their views. Communication tools/services that staff may use in their academy schools include:

- Pastoral support e.g. Emotional Literacy Support Assistants
- Makaton
- Therapy e.g. Lego, Drawing and Talking, Play Therapy
- Specialist support e.g. teacher of the deaf; BSL

When concerns are directly shared by a child

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

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

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

When children are sharing their concerns; staff should:

- **Listen to the child.** Please refer to this [NSPCC poster](#).
- **Remain calm:** the child may stop sharing if they feel the staff member is upset or shocked by what the child is telling them.
- **Explain it can't be a secret.** Staff must explain to the child that what they share has to be passed on and to who so that you can help them. Think about when to do this to make sure the child feels safe and can continue to trust you and other staff.

- **Reassure** and offer comfort to the child (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.
- **Seek the child's views:** use questions or communication tools that help the child to share from their own point of view. Gather information: do not investigate or assume what is happening to the child.
- **Explain** what will happen next. If you don't know everything that is going to be done, tell the child that you will make sure that they are kept informed.
- **Report and record** the conversation immediately as outlined in the [Reporting concerns](#) section.
- **Seek support** if you feel distressed e.g. from school based supervision; your DSL; coaching.

Report

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

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

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

Report to Designated Safeguarding Lead

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

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

Record concerns

[Record Keeping – General Principles](#)

All safeguarding concerns must be recorded by the staff member in on CPOMS. Guidance on how to log incidents can be found in the CPOMS Toolkit.

When logging a concern, it is the role of the person recording to effectively convey the nature of the concerns to DSLs or Deputy DSL.

Records are vulnerable to misinterpretation and decisions may be made by DSLs and Deputy DSLs based on the information provided to them.

Staff should take time to ensure that concerns provide an accurate representation of the situation, and convey the child or young person's perspectives, wishes and feelings.

The information recorded is likely to have a direct influence on the support put in place for a child and their family. When recording incidents or actions on CPOMS, staff should ensure that records are:

- Professional (consider spelling and grammar, avoiding jargon, initials and abbreviations)
- Objective (be descriptive, use body maps and avoid subjective words (e.g., "inappropriate"))
- Accurate (avoid vague or ambiguous statements, distinguish between fact and opinion and use the child's own words)
- Child Centred (capture the perspectives, wishes and feelings of the child, wherever possible)

- Timely (concerns should be logged at the earliest opportunity)
- Succinct (details should be comprehensive, but concise)
- Evidenced (upload relevant evidence to the incident, such as statements, if applicable) Evidence of indecent images or videos of children MUST NOT be uploaded to CPOMS.
- Action focussed (include any action already taken) Staff should be mindful that records may be shared with children, their families or presented as evidence in court.

[Appendix D: Safeguarding Concern Reporting Format for use on CPOMS.](#)

Each safeguarding concern record should include:

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

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

Designated Safeguarding Lead Response

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

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

The Designated Safeguarding Lead will:

Consider and assess the concern.

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

- [Working Together to Safeguard Children 2023](#) (particularly Chapters 1 and 3)
- [Keeping Children Safe in Education 2024](#)
- [SSCP Threshold Document](#)
- Other [relevant local tools and pathways](#) (West Midlands Procedures)
- If applicable [Appendix B: Child-on-Child Abuse Procedures](#)
- If applicable [Understanding and identifying radicalisation risk in your education setting](#)
- [When to Call the Police Guidance for Schools](#)

Decide on what action to take.

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

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

Actions could include one or more of the below:

- **Manage internally:** in alignment with school policies and processes including offering support to the child and their family through the school pastoral support (Universal/School Early Help) offer in a way which addresses the needs/risks identified. This may also include actions to make locations/infrastructure in school (including

online) safer; adapt the curriculum to ensure we are [Teaching our children how to keep safe](#) ; or [Working in Partnership](#) .

- **Offer Early Help/Targeted Early Help.** This could include offering and/or referring the child or their family enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children’s wishes and feelings.
- **Raise concerns to Children’s Social Care** in line with the [SSCP Thresholds document](#) and [relevant local tools and pathways](#).
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police.

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

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

Record actions, decisions, and outcomes.

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

Manage and oversee any ongoing response.

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

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

Appendix A: Alternative Provision Quality Assurance Checklist

Alternative Provision Quality Assurance Checklist			
Name of alternative provision:			
Name of person completing checklist (from host school):			
All agencies and settings who place pupils at alternative provision MUST quality assure the placement. This quality assurance document must be completed prior to working with a new alternative provision and frequent (at least half termly) thereafter.			
		On file/ evidence of check	Date & Initial
1	If this quality assurance check is a review, please confirm the date of previous assurance check. This should be at least half termly.		
2	Is the alternative provision registered as an independent school with the DfE? Y/N Education providers offering full-time education for five or more children of compulsory school age, or at least one child with an EHC plan or who is looked-after by a local authority, are required to be registered as independent schools and must meet the Independent School Standards. Commissioners should ensure they do not place children with an unregistered provider if that would mean the setting would need to be registered as an independent school.		
3	What is the provider's DfE number? (If applicable)		
4	Copy of signed Service Level Agreement (SLA) /contract (attache The agreement should include the nature of the intervention, its objectives, reintegration plans, and the timeline to achieve these objectives, set out in a personalised plan for the child. These objectives, plans, roles, and responsibilities should be set out in writing by the provider and regularly reviewed with all stakeholders , including parents and the child where appropriate.		
5	Is there a clear governance structure within the Alternative provision? Y/N The alternative provision strategic plan should be clear on the role and responsibility of all stakeholders and agencies in the planning and delivery of effective education for children needing additional support. For Pupil Referral Units (PRUs), local authorities are required to establish management committees with a strategic role in setting and monitoring aims and objectives.		
6	Does the referral process include the requirement for a detailed pupil profile from the host school prior to agreement of placement? Y/N Prior to placement, all relevant information must be shared with providers and other parties, including details on SEN, disability or medical need, literacy, safeguarding, or other issues. This		

	information should be jargon-free and provided in accordance with data protection principles.		
7	Pupil's attendance should be monitored daily. Is this included in the SLA? Y/N Copy of providers Attendance policy attached. Arrangements must be in place for prompt follow up of all absence, particularly unexpected and unexplained absence.		
8	Is there a procedure for when pupils fail to attend or the placement breaks down? Y/N Commissioners should maintain regular contact with the provider and child, with clear procedures in place to exchange information, monitor progress, and provide pastoral support. Where safeguarding concerns arise, the placement should be immediately reviewed and terminated if necessary , unless or until those concerns have been satisfactorily addressed.		
9	Is there adequate access to resources for all pupils who access the provision? Y/N Alternative provision should be of good quality, undelivered by high quality staff with suitable training, experience and safeguarding cheques.		
10	Is there inclusive practice with regards to positive behaviour management, attendance and punctuality? Y/N The curriculum should support academic achievement while also addressing any additional needs of the child, including improving behaviour and re-engaging them in education. The "Behaviour in Schools Guidance" is referenced for delivering provision to address behaviour and improve engagement		
11	Is there regular assessment and review of pupil progress? Y/N Provision agree to share weekly progress reports Providers should use a range of appropriate assessment tools and approaches to accurately measure progress regardless of entry and exit points or length of stay. The commissioner and provider should build in regular review dates (at least half-termly) to monitor the child's progress. The home school should receive regular reports on the child's achievements and progress, including attendance and behaviour management, during the placement		
12	Are risk assessments completed for activities that pupils may undertake? Y/N (copy attached) The commissioning school or local authority retains safeguarding duties towards the child and must be satisfied that the provision is in a safe environment. This overarching duty implies a need for specific risk assessments for activities to ensure safety.		
13	Is there a full and clear pupil induction procedure regarding health and safety and fire evacuation? Y/N A well-structured induction plan allows the provider to understand the child's background, experience, and needs, enabling them to tailor the curriculum, support, and		

	interventions to the child's individual needs. Engagement with parents should also be part of the initial induction plan.		
14	Are there robust procedures in place (including information sharing that are referenced in the SLA) to safeguard children in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N Copy of providers Safeguarding/Child protection policy attached.		
15	Has evidence of staff receiving accredited child protection training been seen? Y/N Has evidence of DSL receiving training for their role been seen? Y/N Have contact details for DSL been provided? Y/N (attached).		
16	Copy of public liability insurance document attached.		
17	Is there a policy for when members of staff are working alone with pupils? Y/N (copy attached)		
18	Does the provider have an online safety policy in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N (copy attached) The Safeguarding and Child Protection Policy (Greenacres) provides extensive detail on "Online Safety", including expectations for staff, governors, children, and visitors regarding device use; acceptable use agreements; arrangements for filtering, monitoring, and cyber security; and specific procedures for mobile phones		
19	Copy of health and safety policy attached.		
20	Has written confirmation from the provider that staff vetting checks have been undertaken been received? Y/N Checks include; <ul style="list-style-type: none"> • an identity check; • a barred list check; • an enhanced DBS check/certificate; • a prohibition from teaching check; • further checks on people who have lived or worked outside the UK • a check of professional qualifications, where required; and • a check to establish the person's right to work in the United Kingdom. Has confirmation of these checks been added to the Single Central Record?		
21	Is there a Designated First Aid Officer and suitable equipment available? Y/N <ul style="list-style-type: none"> - Qualified First Aiders identified - Recording system for accidents including informing host school and home - Historical or current RIDDOR investigations - Evidence of full first aid kit 		
22	Has confirmation been received from the provider that a representative will attend or contribute to multi-agency meetings when necessary? Y/N The strategic plan for alternative provision requires effective collaboration between all relevant stakeholders and agencies. The plan should be clear on the role and responsibility of all		

	stakeholders and agencies in the planning and delivery of effective education		
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Action Plan
 If 'no' is answered to any of the questions in Part 2 an action plan must be formulated to obtain information

Action reference number.	Area for improvement	Intended action

Signed by host school:

Date:

Signed by Alternative Provision:

Date:

Appendix B: Child-on-Child Abuse Procedures

Harmful Sexual Behaviour in School Resources | SWGfL.

[Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)

We aim to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

- Expecting all staff and Governors/Trustees in our academy schools to ensure they are adhering to and promoting the commitments we make in our [Safeguarding Statement](#).
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that our Designated Safeguarding Lead and other relevant staff have completed training in how to assess and respond to child-on-child abuse. For further detail; please refer to [Professional Development and Support](#).
- Being clear how we expect our children to behave towards one another. Our Behaviour Policy outlines these expectations; how the schools will support our children to understand and fulfil them; and how we will prevent and respond to behaviour which falls below our expected standards (including all forms of bullying). Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring we are [Teaching our children how to keep safe](#).
- Making sure that children who experience or are at risk of experiencing abuse from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive in their behaviour towards other children are identified, supported and safeguarded from engaging in further harmful behaviour.
- Making sure that we are taking positive action to ensure that [Children who are more vulnerable to child-on-child abuse](#) are not disproportionately impacted by child-on-child abuse in our school.
- Referring to [Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)

What is child-on-child abuse?

Child-on-child abuse:

- Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context; we know that child-on-child abuse can take place in spaces and at times of the school day where children are less likely to be supervised. We also know that where child-on-child abuse is taking place outside of schools (including online) this abuse can also continue and have an impact on a child when they are at school.
- Can be defined in different ways including but not 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).
- A child may experience one or multiple types of child-on-child abuse at the same time.
- Further detail is outlined in [Keeping children safe in education Part 1](#); Child-on-child abuse and Part 5

Children who are more vulnerable to child-on-child abuse

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

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

Children who harm others may have additional or complex needs. Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience⁸ in their life. Children who harm other children may have power or privilege over a child(ren) they are causing harm to but can also be powerless or vulnerable in other part of their lives.

Child-on-child abuse is harmful to all children involved.

Evidence⁹ indicates that children from particular groups are more vulnerable to child-on-child abuse. This includes children who:

- Have special education needs and/or disabilities and/or health issues.
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). These children are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias¹⁰.
- Are Lesbian Gay, Bi-Sexual; Gender Questioning. These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
- Are female. Girls are more vulnerable to harmful sexual behaviour and abuse in intimate personal relationships.
- Are male. Boys are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

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

⁸ See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

⁹ Evidence sources:

- [Keeping Children Safe in Education 2024](#); Part 2: Children potentially at greater risk of harm.
- [Prevalence of bullying \(anti-bullyingalliance.org.uk\)](#).
- [Safeguarding d/Deaf and disabled children | NSPCC Learning](#);
- [Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning](#);
- [Safeguarding LGBTQ+ children and young people | NSPCC Learning](#);
- [Spotlight #3: Young people and domestic abuse | Safelives](#).
- [Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)

¹⁰ [Adultification bias within child protection and safeguarding \(justiceinspectorates.gov.uk\)](#)

When is child-on-child behaviour considered abusive?

We recognise the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse.

In considering whether behaviour is abusive; staff should consider:

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

The needs and circumstances of the child who is identified as being potentially harmed should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.

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

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

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

Features of abusive behaviour¹¹ can include:

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

Our response to child-on-child abuse

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

¹¹ Adapted from Hackett Continuum as described in [Understanding sexualised behaviour in children | NSPCC Learning](#). When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non Harmful Sexual Behaviour) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider (see [Farrer and Co \(2022\) page 35-36](#))

In responding to any concern of child-on-child abuse; we will take account of:

- Part 5 Keeping Children Safe in Education 2024.
- [Use of reasonable force in schools](#)
- [Searching, screening and confiscation at school](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [When to call the police: guidance for schools and colleges.](#)

Risk and needs assessment.

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

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

The purpose of the risk and needs assessment is to safeguard **all children involved** (including children who may not be at the school, such as siblings) and will clearly outline the strategies to be put in place to mitigate risk and address any identified needs.

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

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

In circumstances where children are displaying sexual behaviour towards other children that raises concern; our Designated Safeguarding Lead/Deputy Designated Safeguarding Lead is trained in and will use the Brook Traffic Light Tool to inform the risk and needs assessment.

Our template risk and needs assessments can be found:

- Sexualised Behaviour Risk and Need Assessment (Appendix F)
- Empower Trust Risk Assessment Template can be used for any other child on child abuse.

Response

The parents/carers of **all involved children** will be notified of and involved in our response. We will only share the details of other children to parents/carers who do not have parental responsibility for them where we have consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child (please also refer to [Record Keeping and Information Security](#))

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

- **Manage internally** in alignment with our Behaviour Policy and pastoral support offer in a way which addresses the needs/risks identified. Any sanctions imposed on the child causing harm will be proportionately balanced with any other responses (such as police involvement) and take accounts of risks and needs; as well as the ongoing impact on/risk to the child who has been harmed or others. This may also include actions to make locations/school infrastructure (including online) safer; adapt our curriculum to ensure we are [Teaching our children how to keep safe.](#); or [Working in Partnership](#).
- **Offer Early Help/Targeted Early Help.** This could include offering and/or referring **any child involved** to enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds](#)

[document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.

- **Raise concerns to Children's Social Care** in line with the [SSCP Thresholds document](#).
- **Report to the Police.** We will take account of [When to call the police: guidance for schools and colleges](#).

Recording and monitoring

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

Appendix C: File Transfer Record and Receipt

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



St Mary's CE Primary School and Nursery
Poynton Road
Shawbury
Shropshire
SY4 4JR
01939 250323

<https://www.shawburystmarys.org.uk>

admin@stmarys.empowermat.co.uk

Date :

Dear DSL,

Request for Child Protection/Safeguarding Records

In accordance with safeguarding procedures, all schools are expected to forward any child protection information they hold for a young person to his or her next school.

A pupil from your school has recently joined our School. If you have any child protection records, please send them confidentially to me, by recorded delivery to, St Mary's CE Primary School and Nursery, Poynton Road, Shawbury, Shropshire. SY4 4JR.

Alternatively, we use CPOMS recording system and files can be transferred using their transfer functionality.

If there are no concerns, please complete the section below to state this. Please accept my thanks in anticipation of your time and help with this matter.

Yours faithfully,



Mrs S A North
Headteacher, DSL

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



St Mary's CE Primary School and Nursery
 Poynton Road
 Shawbury
 Shropshire
 SY4 4JR
 01939 250323

<https://www.shawburystmarys.org.uk>

admin@stmarys.empowermat.co.uk

Date:

Dear Colleague,

Confirmation you have received Child Protection/Safeguarding Records

In accordance with safeguarding procedures, all schools are expected to forward any child protection information they hold for a young person to his or her next school.

A pupil from our school has recently joined your School. In order that we keep accurate records for pupils who leave our school, please would you kindly complete and return the attached slip as soon as you have received the records for the pupil listed below.

This can be emailed to admin@stmarys.empowermat.co.uk

Yours faithfully,

Mrs S A North
 Headteacher, DSL

Receiving School: Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You

Pupil name		
		Please tick
I can confirm that there are <u>no safeguarding records</u> to transfer relating to this pupil.		
I can confirm that there are safeguarding records to transfer, and I will: <ul style="list-style-type: none"> • Send them via recorded delivery <li style="text-align: center;">or • Transfer them using CPOMS 		
Name and signature of DSL:		
Date:		

are advised to keep a copy for your own reference.

Appendix D: Safeguarding Concern Reporting Format for CPOMS

Recording a concern about a child's safety or welfare

Part 1 – For staff use.

<p>When recording incidents or actions on CPOMS, staff should ensure that records are:</p> <ul style="list-style-type: none"> • Professional (consider spelling and grammar, avoiding jargon, initials and abbreviations) • Objective (be descriptive, use body maps and avoid subjective words (e.g., “inappropriate”)) • Timely (concerns should be logged at the earliest opportunity) • Succinct (details should be comprehensive, but concise) • Evidenced (upload relevant evidence to the incident, such as statements, if applicable) Evidence of indecent images or videos of children MUST NOT be uploaded to CPOMS. • Action focussed (include any action already taken). <p>Staff should be mindful that records may be shared with children, their families or presented as evidence in court.</p>	
Format for recording on CPOMS:	Details to be added into the incident box example:
Location:	<i>e.g. Oak Class, Hall, Playground</i>
Date and time:	<i>e.g. 12.09.2024 @ 14:20</i>
Who was involved: Avoid initials	<i>e.g. Thomas Jones, Terry Jack</i>
<p>Incident: How did the concern arise? What is the main concern? What (if recording a verbal disclosure by a child use their words)? What de-escalation strategies were used? Is there a physical injury? If so, complete the body map, be precise about the type of injury.</p>	<p><i>e.g. Thomas Jones was given a rubber by Terry Jack. Terry asked for it back and Thomas refused. Terry hit Thomas in the stomach. First Aid administered to Thomas Davies – red mark, ice pack applied. (Recorded on Body Map) Using PACE model Terry calmed down and walked out of the class to discuss the incident. Thomas asked to leave the classroom to discuss the incident</i></p>
<p>Investigation details: Any witnesses? Upload relevant evidence to the incident e.g. statements; handwritten information from staff. What is the pupil's account/perspective? Actions: What actions have already been taken?</p>	<p><i>e.g. It was unclear if the rubber given to Thomas Davies was a permanent arrangement. Both boys realised that this caused the argument. Discussed not meeting school rules of 'Respect/Safe'. The boys apologised and missed some of their play time.</i></p>

Part 2: For DSL/Deputy DSL to complete.

Follow up actions by the DSL/DDSL	Information to be added to CPOMS as an action
Has the concern been discussed with parent/carer (include summary of discussion)? If not state reason why.	<i>e.g. Jane Doe (DSL) contacted both parents. Both sets of parents agreed to follow up with the children at home and supported the school's actions.</i>
<p>Consider all the evidence and any further action needed. Consult the SSCP Thresholds document and relevant local tools and pathways. If no further action is needed, what is the rationale and reasons why? Other action required? (By whom)</p>	<p>Could include: No further action needed: give reason why. Manage internally: in alignment with school policies and processes e.g. pastoral, Early Help, MHST Offer Early Help/Targeted Early Help. Any referrals for support will require parental consent and will take account of children's wishes and feelings. Raise concerns to Children's Social Care in line with the Report to the Police. If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police.</p>
Was a referral made? Record names of individuals/agencies who have given information regarding outcome of any referral made.	

Log on CPOMS planner for a reminder to follow up from external agency.	
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Appendix E: Key Personnel at XXX School

Role	Name	Contact details
Headteacher	Sarah North	01939 250323 head@stmarys.empowermat.co.uk
Designated Safeguarding Lead (DSL)*/**	Sarah North	01939 250323 head@stmarys.empowermat.co.uk
Deputy DSL(s)*/**	Rebecca Wade Laith Al-Asmar Jodie Owen Lucy Edge	01939 250323 admin@stmarys.empowermat.co.uk
Designated Teacher	Sarah North	01939 250323 head@stmarys.empowermat.co.uk
Mental Health Lead	Sarah North	01939 250323 head@stmarys.empowermat.co.uk
Online Safety Lead	Katy Styles	01939 250323 admin@stmarys.empowermat.co.uk
Relationship Sex Health Education Lead	Rebecca Wade	01939 250323 admin@stmarys.empowermat.co.uk
Chair of Governors*	Kelly Leonard	01939 250323 admin@stmarys.empowermat.co.uk
Safeguarding Governor	Kelly Leonard	01939 250323 admin@stmarys.empowermat.co.uk
CLA Governor	Kelly Leonard	01939 250323 admin@stmarys.empowermat.co.uk
Strategic Leads	Sam Scott Tricia Slater	Sam.scott@empowermat.co.uk Tricia.slater@empowermat.co.uk
Safeguarding Trustee	Paul Bunting	paul.bunting@empowermat.co.uk

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

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

Appendix F Harmful Sexual Behaviour Risk and Needs Assessment

Harmful Sexual Behaviour Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a 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.- KCSIE part 5 The risk assessment will be shared with all staff who work with the learner, as well as parents/carers. It will reflect any changes in behaviour and will be regularly updated and evaluated to assess impact.

The term harmful sexual behaviour covers a wide range of behaviours, which may be considered problematic, abusive, or violent and may also be developmentally inappropriate. HSB can occur online, offline or in a blend of both environments. The term HSB is widely acknowledged in child protection and should be treated in this context. Behaviours that would be categorised as problematic or harmful as per the Hackett continuum ([part of the NSPCC harmful sexual behaviour framework](#)) are useful to capture in this risk assessment.

The risk assessment is split into two sections. First is a summary to capture details about the child and any other surrounding safeguarding issues. The second section is the full risk assessment to detail the incident(s) that have led to the need for this risk assessment to be carried out, provide evidence and log any further concerns.

Summary	
Name of child/young person	
D.O.B.	
Any outside agency involvement	
Safeguarding concerns/context including previous behaviours/ incidents recorded and subsequent measures taken	
SEND status	
Date of SEND Diagnosis	
Additional relevant background information (including known vulnerabilities, previous behaviours/ incidents recorded, and subsequent measures taken)	
Names and details of current professionals involved	
Date of initial risk assessment	
Review dates	

Full Risk Assessment
<p>Details of the incident/behaviours that have led to this risk assessment Describe the types of behaviour or language observed (linked to KCSIE/Policy)</p> <ul style="list-style-type: none"> • Where did it happen? • When did it happen (date and time) – is this an isolated incident or have there been multiple occurrences? • Is anyone else involved – who and ages? • Is there an imbalance of power? • What was the learner’s response? <p>Insert details of behaviour</p>

What was the response of the parents/carer when it was reported to them?
Insert details of the response

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Other behavioural concerns if any e.g. Use of violence/coercion/ distracted or out of character behaviour, incidents and school and out of school, friendship/relationship concerns, disruptive behaviour, emotional wellbeing etc
Insert behavioural concerns

What are the specific harmful sexual behaviours? Use the definitions from KCSIE to identify the behaviours, include online.
Be specific about behaviours

Evidence

Impact on others – who might be affected or harmed? Are there specific concerns about age groups, gender, vulnerable children?

Evidence

Identified or known potential triggers or additional risk including online E.g. particular lessons, locations, activity using technology, activities, times of day, peers, staff, activity outside of school, transport home etc.	Strategies to mitigate risk E.g. Additional supervision or support, seating arrangements, specific adults that a young persons can contact, managed timetable, transport arrangements etc.

Child's strengths, interests, positive characteristics

Any current work being undertaken to support the child e.g. outside agency intervention, in school support, and how the child is responding to the measures etc

Any external agency referrals or contact made with other support agencies and support received (and how the child is responding)

Include name of agency and contact details, support being sought and who made the referral/contact and any views that they have on the child in question

Review

How will you assess whether the level of risk has changed (decreased or increased)? What does the child need to work toward achieving/avoiding?

E.g. Change in the child's attitudes about their behaviour, change in child or young person's approach to others, change in number and type of behavioural incidents of HSB etc

Date of next planned review

Name of those with whom the assessment has been shared

Agreed by

Name	Role	Signature	Date
	Headteacher		
	DSL		
	Child or young person		
	Parents/Carers		
	Other Agencies		

Appendix G Use of mobile phones in Schools

The DfE's non-statutory mobile phone guidance says that staff should not use their own mobile phone for personal reasons in front of pupils throughout the school day.

Personal mobile phones

Staff (including volunteers, contractors and anyone else otherwise engaged by the school) are not permitted to carry personal mobile phones while working. **This protects staff (including volunteers, contractors, and anyone else otherwise engaged by the school) from being distracted from their work and from allegations of inappropriate use.**

Use of personal mobile phones must be restricted to non-contact time, and to areas of the school where pupils are not present (such as the staffroom).

Staff with known medical conditions that rely on their phone/smart watches for medical data such as diabetes/sugar levels are permitted to carry a mobile device.

There may be circumstances in which it's appropriate for a member of staff to have use of their phone during contact time for personal reasons. For instance:

- In the case of an urgent medical phone call
- In the case of acutely ill dependents or family members

The headteacher will decide on a case-by-basis whether to allow for special arrangements.

School staff can use the school office number 01939 250323 as a point of emergency contact or notify the office that their mobile phone in secure storage has been left on to receive a call.

Data protection

Staff must not use their personal mobile phones to process personal data, or any other confidential school information, including entering such data into generative artificial intelligence (AI) tools such as chatbots (e.g. ChatGPT and Google Bard). ICT acceptable use policy within the online safety policy gives more detailed guidance.

Safeguarding

Staff are advised not to give their personal contact details to parents/carers or pupils, including connecting through social media and messaging apps.

Staff must avoid publicising their contact details on any social media platform or website, to avoid unwanted contact by parents/carers or pupils.

Staff must not use their personal mobile phones to take photographs or recordings of pupils, their work, or anything else which could identify a pupil. If it's necessary to take photos or recordings as part of a lesson/school trip/activity, this must be done using school equipment.

Using personal mobiles on school trips

Carrying mobile phones on trips can help to ensure safety for all members of the school or centre party. However, it is important that the following guidance is adhered to in order to keep children safe and protect staff and volunteers from accusations of inappropriate use:

- The party leader should carry a mobile phone for use in contacting other staff members or volunteers on the trip, contacting the school or contacting the emergency services.
- Members of staff and volunteers may carry their own, personal mobile phones within the following guidelines:
 - Personal phones should only be used to contact staff members or volunteers on the trip, the campus or emergency services. If possible, these calls should be made away from children.
 - Personal phones should not be used for any purpose other than school business for the duration of a trip. This means that personal calls or texts should not be made or accepted.
 - On residential trips this will apply while the member of staff or volunteer is on duty. Staff and volunteers should ensure that next of kin are provided with the school/residential school numbers so that in an emergency the school is contacted and will make contact with the relevant person through the party leader.
 - If it becomes necessary for a member of staff or volunteer to make a personal call or text, then the party leader or another member of staff should be informed and take responsibility for the pupils in the group while the call or text is made away from sight and sound of any pupils.
 - Volunteers are acting role models for the duration of the trip and therefore must not take photos or videos of any pupils, including their own child, using a mobile phone or any other mobile device, e.g. camera or tablet, without the express permission of the party leader. Volunteers may be asked to take photographs of their group using a school or centre device – this must be passed back to the party leader at the end of the trip.
 - Personal mobile phones must not be used under any circumstances to take photographs or videos of pupils.
 - Volunteers are acting role models for the duration of the trip and therefore must not take photos or videos of any pupils, including their own child, using a mobile phone or any other mobile device, e.g. camera or tablet, without the express permission of the party leader. Volunteers may be asked to take photographs of their group using a school or centre device – this must be passed back to the party leader at the end of the trip.
 - The party leader may ask volunteers to provide them with their mobile phone number for the duration of the trip so that they can be contacted in case of emergency. The party leader undertakes to ensure that these numbers or not held on any mobile device or in any written form after the end of the trip.
 - It is advised that if the party leader is using his or her own mobile phone, then if they need to contact anyone during the trip they do so by pre-dialling 141 (some mobile providers use a different prefix – staff are advised to check this with their provider) before the number so that their own number remains protected.

Sanctions

Staff that fail to adhere to this policy may face disciplinary action. See the school's staff disciplinary policy for more information.

Use of mobile phones by pupils

- Children who walk to and from school without an accompanying adult may carry a mobile phone for safety. In these cases, children may bring a mobile phone onto school site. They must deposit it with the school office at the start of the day and collect it from the office at the end of the day.

- Parents and carers need to be aware that whilst there are obvious benefits to pupils having a mobile phone in terms of personal safety there are also some associated risks such as potential for theft, bullying and inappropriate contact, including grooming by unsuitable persons.
- We would also like to alert parents and carers to the risks that using a mobile phone has while walking to and from school. Children who are concentrating on using their phone can have reduced general safety awareness which may result in road accidents and/or injury if a child is not paying attention to their surroundings.
- Mobile phones deposited in the office by children will be kept safely in a locked cupboard. Whilst the school will take every reasonable care, it accepts no responsibility whatsoever for theft, loss, damage or health effects (potential or actual) relating to mobile phones. It is the responsibility of parents and carers to ensure mobile phones are properly insured. It is:
 - Recommended that pupil's phones are security marked and password protected.
 - Children are not allowed to bring mobile phones into any other areas of the school.
 - Any mobile phones discovered to have been brought into the school and not handed in to the office will be confiscated immediately. Parents or carers will be asked to collect the mobile phone from the school office.
 - Children with known medical conditions that rely on their phone/smart watches for medical data such as diabetes/sugar levels are permitted to carry a mobile device.
 - Children are not allowed to carry mobile phones on any school trips or residential trips.
 - If a member of the staff has any suspicion that a mobile phone brought into school by a pupil has unsuitable material stored on it, the pupil will be required to hand over the phone immediately to a member of staff and parents or carers will be asked to collect it from a member of the senior leadership team. In circumstances where there is a suspicion that the material on the mobile phone may provide evidence relating to a criminal offence the phone will be handed over to the school's safeguarding lead or to the head teacher for further investigation and the parent or carer asked to collect it from them.

Use of smartwatches by pupils, parents, visitors and staff

The DfE's non-statutory mobile phone guidance includes in the term 'mobile phones' all devices with communications and smart technology that the school chooses to include in their policy.

Smartwatches are wristwatches with smart technology in them. They can be used to tell the time, send and receive text and voice messages, make calls and listen to music. Some smart watches have wellness and health-related features.

Wearable technology is permitted on school premises but must not be used during lesson time. All adults within the school building are to put their watch in **schooltime/airplane mode/switch off Bluetooth and Wi-Fi mode** while children are on the school site. **This protects adults from being distracted from their work and from allegations of inappropriate use.**

Due to the high value of smart watches children are advised not to wear the watches in school. All personal devices are brought onto school premises by pupils/staff at their own risk. The school does not accept liability for loss or damage of personal devices.

Wearable technology is not to be worn during tests or examinations.

Sanctions

The following sanctions will be used if a pupil is in breach of this policy.

For example:

Will mobile phones be confiscated? (Schools are permitted to confiscate phones from pupils under sections 91 and 94 of the Education and Inspections Act 2006)

If confiscated, parents are to collect the phone at the end of the school day.

How do the sanctions for mobile phone use link with your school's wider behaviour policy?

Staff have the power to search pupils' phones in specific circumstances, as set out in the DfE's guidance on searching, screening and confiscation. The DfE guidance allows schools to search a pupil's phone if there is a good reason to do so (such as having reason to believe the phone contains pornographic images, or if it suspected of being used inappropriately and is being/has been used to commit an offence or cause harm to another person). In each case, the sanction given must be reasonable and proportionate. The school will also consider whether:

- There are any relevant special circumstances (for example, age, religious requirements, special educational needs, disability)
- The pupil's behaviour may indicate they may be suffering, or at risk of, harm. If this is suspected, staff will follow the appropriate procedure set out in Part 1 of Keeping Children Safe in Education

Certain types of conduct, bullying or harassment can be classified as criminal conduct. The school takes such conduct extremely seriously and will involve parents, the police or other agencies as appropriate.

Such conduct includes, but is not limited to:

- Sexting (consensual and non-consensual sharing nude or semi-nude images or videos)
- Upskirting
- Threats of violence or assault
- Abusive calls, emails, social media posts or texts directed at someone on the basis of someone's ethnicity, religious beliefs or sexual orientation

Use of mobile phones by parents/carers, volunteers and visitors

Parents/carers, visitors and volunteers will be informed of the rules for mobile phone use when they sign in at reception or attend a public event at school. Notices are displayed in reception advising visitors, parents and carers that mobile phones must be handed in on arrival.

- We ask all parents to turn their phone off or put in silent mode before handing their phone in.
- If parents/visitors are expecting an important call, they may leave their phone on which will alert a member of staff who will then respond according to the instructions given at the time.
- Visitors and supply staff are not allowed to use mobile phones on the school grounds and phones must be handed in at reception when signing in. Mobile phones can be used in the staff room.
- If a visitor, parent or carer is found with a phone in school after being asked to hand it in they will be asked politely to return to reception to hand it in.
- It is recognised that many parents and carers use their mobile phone as a camera/video device to record their child at special performances e.g. sports day, etc. On these occasions the use of a phone is permitted for photographing/videoing only; images should only be taken by parents and carers if they include their own child and that the use of these images is for their own personal use and must not be uploaded for any

internet use including Facebook/SnapChat/Instagram/TikTok or any other social networking sites or used in any form of publication unless they are solely of their own child.

- The school recognise that children may inadvertently be included in photographs by another parent; the school, therefore, are obliged to warn parents and carers of the legal and safeguarding risks of publishing such photographs on any platform. The placing of any photographs of children on social media is dangerous and parents may be in breach of the Data Protection Act if they upload photos of other children without the explicit consent of that child's parents

Appropriate use of mobile phones is essential all Empower Trust Schools.

Use of photographs

We believe that photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life. Parental permission for the different ways in which we use photographs is gained as part of the initial registration at each school. We take a mixture of photos that reflect the settings, sometimes this will be when children are engrossed in an activity either on their own or with their peers. To safeguard children and adults and to maintain privacy, cameras are not to be used during intimate care situations by adults or children.

Any photographs / videos taken are transferred as soon as possible to the school network and are removed from cameras / iPads etc as soon as possible. The images / videos are held where they are password protected. This information can only be accessed by school staff from school devices.

Early Years

In early years, to safeguard children and practitioners online, providers will find it helpful to refer to 'Safeguarding children and protecting professionals in early years settings: online safety considerations at: <https://www.gov.uk/government/publications/safeguarding-children-and-protecting-professionals-in-early-years-settings-online-safety-considerations>

Appendix H Specific forms of abuse and safeguarding issues as outlined in Annex B of KCSIE

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: <https://www.actionagainstabduction.org/> and www.clevernevergoes.org.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

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

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

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

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

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

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

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

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

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

- have older boyfriends or girlfriends; and

- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

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

County Lines

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

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

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

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

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

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

Children and the court system

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

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

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

Children were absent from education

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

Children with family members in prison

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

Cybercrime

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

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

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

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

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

Domestic abuse

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

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

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

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

Operation Encompass

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the

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

National domestic abuse helpline

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

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

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be

progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

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

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

Mental Health

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

More information can be found in the [Mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England. 149 has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Better Health Every Mind Matters](#) for links to all materials and lesson plans

Modern slavery and National Referral Mechanism

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

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

Preventing radicalisation

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

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

The Prevent duty

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

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

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

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

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

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

Additional support

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

The Home Office has developed three e-learning modules:

[Prevent awareness e-learning](#) offers an introduction to the Prevent duty.

[Prevent referrals e-learning](#) supports staff to make Prevent referrals that are robust, informed and with good intention.

[Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

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

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings to comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

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

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

Sexual violence and sexual harassment between children in schools and colleges

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

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

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

Serious violence

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

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

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

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery. A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

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

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

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

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

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

So-called ‘honour’-based abuse (including female genital mutilation and forced marriage)

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see below). FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

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

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.¹⁵⁵ Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college’s designated safeguarding lead (or a deputy) and involve local authority children’s social care as

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

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

Forced marriage

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage> 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.

St Mary's CE Primary School and Nursery

Prevent Risk Assessment



Section 1: School Information

This Risk Assessment is individual to each school. It needs to be shared with the staff, LGB and the Strategic Lead for Safeguarding once complete. This will then be shared with the link safeguarding trustee.

School name	St Mary's CE Primary School and Nursery
Date of Assessment	05/03/26
Next Review Date	05/09/26
Assessment Completed by	Sarah North Headteacher/DSL
Approved by	Sarah North
Shared with	<input type="checkbox"/> Local Governing Body <input type="checkbox"/> Director of Education/Strategic Lead for Safeguarding <input type="checkbox"/> Safeguarding Trustee

Section 2: Understanding the Threat Picture

2.1 National Context – risk of radicalisation generally

Current UK Threat Level: [[Threat Levels | MI5 - The Security Service](#)] SUBSTANTIAL - an attack is likely (04/03/26)

Key National Concerns (brief summary based on latest government guidance):

- Islamic Extremism
- Extreme Right Wing Terrorism
- Extreme violence or mass casualty attacks are increasing
- Threat from hostile states

Source of information: [UK Parliament Prevent Statistics](#); CONTEST strategy overview [\[gov.uk\]](#)

Date information last updated: March 2026

2.2 Local Risks – risk of radicalisation in your area and institution

Local Area Concerns: (brief summary of the local situation and include anything specific to your institution):

Shropshire Council publishes a high-level summary of its local position.

- Shropshire is formally assessed as a low-risk area for terrorism, but with a clear warning against complacency, particularly around online radicalisation and vulnerable individuals. [\[shropshire.gov.uk\]](http://shropshire.gov.uk)
- The council highlights risks linked to:
 - Vulnerable people may be at risk of radicalisation through the influence of others or via the internet, including ideas and issues around their identity
 - Community cohesion pressures – schools need to promote positive relationships between people from different backgrounds
- Shropshire’s Prevent Strategy highlights:
 - ‘lone actor’ as the highest risk

Source: [Shropshire Council Counter-Terrorism page](#) [Shropshire’s Approach to the Prevent Duty](#)

Leadership and Partnership								
Category	Risk What is the risk here?	What are the hazards?	What has your institution put in place to ensure sufficient understanding and buying from leadership?	Rag	Further action needed- what does your institution need to further action to address the identified risk[s]?	Lead Officer if further action is needed	Date for completion if further action is needed	Support available
Leadership and Partnership								
Leadership	The setting does not place sufficient priority to Prevent and risk assessment/action plans (or does not	Leaders (including governors and trustees) within the organisation do not understand the requirements of the	Prevent training for all staff and governors is completed annually. DSL/DDSL complete referral training in addition.		Each academy needs to check this on a regular (termly) basis to ensure that is it up to date.	DSL/HT		

<p>have one) and therefore actions to mitigate risks and meet the requirements of the Duty are not effective.</p>	<p>Prevent Statutory Duty or the risks faced by the organisation. The Duty is not managed or enabled at a sufficiently senior level.</p>						
	<p>Leaders do not have understanding and ultimate ownership of their internal safeguarding processes, nor ensuring that all staff have sufficient understanding and that staff implement the duty effectively.</p>	<p>Safeguarding link governor and safeguarding trustee have completed prevent training and have sufficient oversight.</p>		<p>Annual check that prevent training has been completed by link safeguarding governor/trustee</p>		<p>March 2026 - Annual check that prevent training has been completed.</p>	
	<p>Leaders do not communicate and promote the importance of the duty.</p>	<p>Sufficient leadership ownership – risk assessment in place for Prevent; relevant safeguarding policies.</p>		<p>School: risk assessment updated annually Trust: Safeguarding policy updated annually</p>			
	<p>Leaders do not drive an effective safeguarding culture across the institution.</p>	<p>Leaders have a clear understanding of reporting and referral mechanisms. All DSL/DDSL and HT have completed the Prevent Referral Training.</p>		<p>Annual check of prevent referral training in addition to main training,</p>			
	<p>Leaders do not provide a safe environment in</p>	<p>Ensuring the sharing of safeguarding policies – staff confirm that they have read policies.</p>		<p>A designated member of the school staff checks all policies are</p>			

		which children can learn.			signed and follows up where they have not been			
		Leaders do not have an induction process that ensures new staff are trained	There is clear induction for new staff to the schools that includes prevent training if needed and for trainee teachers		A designated member of staff checks that new starters have completed the prevent training			
Working in Partnership	The setting is not fully appraised of national and local risks, does not work with partners to safeguard children vulnerable to radicalisation, and does not have access to good practice advice, guidance or supportive peer networks.	The setting is not fully appraised of national and local risks, does not work with partners to safeguard children vulnerable to radicalisation, and does not have access to good practice advice, guidance or supportive peer networks.	The school has strong partnerships with: <ul style="list-style-type: none"> - Local Safeguarding Children's Partnership - Trust DSL/DDSL Network Meetings - Exec Headteacher forum - Early Help Locality Meetings - Insert others 		Ensure local partnership meetings are attended by at least one member of staff and relevant information is fed back at school level. Sign up to Educate Against Hate Newsletter: Educate Against Hate - Prevent Radicalisation & Extremism		DSL's to sign up to the Educate Against Hate Newsletter. To be disseminated to all staff on receipt	
Capabilities								
Staff training	Staff do not recognise signs of abuse or vulnerabilities and the risk of harm is not reported properly and promptly by staff.	Frontline staff including governors, do not understand what radicalisation means and why people may be vulnerable to being drawn into terrorism	Training is broader than e-learning. Information is communicated to staff e.g. via trust newsletter, Add in own e.g. staff updates, notices, emails					

		Frontline staff including governors, do not know what measures are available to prevent people from being drawn into terrorism and do not know how to obtain support for people who may be exploited by radicalising influences. Staff do not access Prevent training or refresher training.	All staff attend safeguarding training refresher and are familiar with key school safeguarding and statutory policies.					
		Staff do not access Prevent training or refresher training.	All staff attend Prevent training with a focus on Notice, Check, Share		Annual check that prevent training has been completed by link safeguarding governor/trustee and staff		March 2026 - Annual check that prevent training has been completed.	
Reducing Permissive Environments								
Building children's resilience to radicalisation	Children and young people are exposed to intolerant or hateful narratives and lack understanding of the risks posed by terrorist organisations and extremist ideologies that underpin them.	The setting does not provide a safe space in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn	Staff are trained for professional curiosity – it could happen here. Regular discussion in assemblies. Children's safeguarding Board.					

		how to challenge these ideas.	Picture News – promotes protected characteristics and British Values					
		The setting does not teach a broad and balanced curriculum which promotes spiritual, moral, cultural mental and physical development of students and fundamental British values and community cohesion.	<p>PSHE curriculum</p> <p>Assemblies – including Picture News (BV link and protected characteristics)</p> <p>Pupil voice</p> <p>Safeguarding Board</p>					
IT Policies	Ineffective IT policies increases the likelihood of students and staff being drawn into extremist material and narratives online. Inappropriate internet use by students is not identified or followed up.	Students can access terrorist and extremist material when accessing the internet at the institution.	<p>Filtering and monitoring systems – Light Speed, in association with Roartech (IT management) – alerts logged</p> <p>iPad risk assessment in place provides additional safeguards</p> <p>e-safety Acceptable Use Policy</p>		Set up (if needed) a log for recording filtering and monitoring alerts to look for patterns and to allow early intervention			
		Students may distribute extremist material using the institution IT system.	As above					
		Unclear linkages between IT policy	The designated safeguarding lead take		Complete Plan Technology in Your			

		and the Prevent duty. No consideration of filtering as a means of restricting access to harmful content.	lead responsibility for safeguarding and child protection (including online safety).		School assessment to identify areas of need (if complete put as a control)			
Visitors	External speakers or visitors being given a platform to radicalise children and young people or spread hateful or divisive narratives.	Leaders do not provide a safe space for children to learn.	A process is in place to manage site visitors, including sub-contractors. The school site is secure (Safer Schools Award)					
		Settings do not have clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised.	The setting has a robust risk assessment and carries out due diligence checks on visitors, speakers, the organisations they represent and the materials they promote or share.		Guidance needed for visitors and speakers re sharing with children.			
		The setting does not conduct any due diligence checks on visitors or the materials they may use.	The private/commercial use of the institution's spaces is effectively managed & due diligence checks are carried out on those using/booking and organisations that they represent.					
	Add anything else that is relevant to the individual school setting,							

